



AKG EXIM LIMITED

(CIN- L00063DL2005PLC139045)

Our Company was originally incorporated at New Delhi as “Akg Exim Private Limited” on 26th July, 2005 under the provisions of the Companies Act, 1956 vide Certificate of Incorporation issued by the Asst. Registrar of Companies, NCT of Delhi & Haryana. Consequent upon the conversion of our Company to public limited company, the name of our Company was changed to “Akg Exim Limited” vide fresh certificate of incorporation dated 17th January, 2018 issued by the Registrar of Companies, Delhi. For further details please refer to the section titled “General Information” beginning on page 52 of this Draft Letter of offer.



Registered Office: 7th Floor, H.B. Twin Tower, Netaji Subhash Place, Pitampura, Delhi-110034
Corporate office: Unit No. 237, 2nd Floor, Tower-B, Spazedge, Sector 47, Sohna Road, Gurugram-122018

Tel:+0124-4267873; **Email id:** info@akg-global.com; **Website:** www.akg-global.com

Contact Person: Ms. Mahak, Company Secretary & Compliance Officer

PROMOTERS OF OUR COMPANY: MR. RAJEEV GOEL

FOR PRIVATE CIRCULATION TO THE ELIGIBLE EQUITY SHAREHOLDERS OF AKG EXIM LIMITED ONLY

THE ISSUE		
<p>ISSUE OF UPTO [●] EQUITY SHARES OF FACE VALUE OF RS.10 EACH (“EQUITY SHARES”) OF AKG EXIM LIMITED (“AKG” OR THE “COMPANY” OR THE “ISSUER”) FOR CASH AT A PRICE OF RS. [●] PER EQUITY SHARE (INCLUDING PREMIUM OF RS. [●] PER EQUITY SHARE) (“ISSUE PRICE”) FOR AN AGGREGATE AMOUNT NOT EXCEEDING RS. 2800.00 LACS TO THE ELIGIBLE EQUITY SHAREHOLDERS ON RIGHTS BASIS IN THE RATIO OF [●] ([●]) EQUITY SHARES FOR EVERY [●] ([●]) EQUITY SHARE HELD BY THE ELIGIBLE EQUITY SHAREHOLDERS ON THE RECORD DATE, I.E. [●] (THE “ISSUE”). THE ISSUE PRICE IS [●] TIME OF FACE VALUE OF THE EQUITY SHARES. FOR FURTHER DETAILS, PLEASE SEE THE CHAPTER TITLED “TERMS OF THE ISSUE” ON PAGE 132 OF THIS DRAFT LETTER OF OFFER.</p> <p><i>@assuming full subscription</i></p>		
GENERAL RISK		
<p>Investment in equity and equity related securities involve a degree of risk and investors should not invest any funds in the Issue unless they can afford to take the risk with such investment. Investors are advised to read the risk factors carefully before taking an investment decision in the Issue. For taking an investment decision, investors shall rely on their own examination of our Company and the Issue including the risks involved. The securities being offered in the Issue have not been recommended or approved by the Securities and Exchange Board of India (“SEBI”) nor does SEBI guarantee the accuracy or adequacy of this Draft Letter of Offer.</p> <p>Specific attention of the investors is invited to “Risk Factors” beginning on page 24 of this Draft Letter of Offer before making an investment in this Issue.</p>		
WILFUL DEFAULTER OR A FRAUDULENT BORROWER		
<p>Neither our Company nor any of our Promoter or Directors has been categorized as a Wilful Defaulter or a Fraudulent Borrower by any bank or financial institution (as defined under the Companies Act, 2013) or consortium thereof, in accordance with the guidelines on Wilful Defaulter or a Fraudulent Borrower issued by the Reserve Bank of India.</p>		
ISSUER’S ABSOLUTE RESPONSIBILITY		
<p>Our Company, having made all reasonable inquiries, accepts responsibility for and confirms that this Draft Letter of offer contains all information with regard to our Company and the Issue, which is material in the context of this Issue; that the information contained in this Draft Letter of offer is true and correct in all material aspects and is not misleading in any material respect; that the opinions and intentions expressed herein are honestly held; and that there are no other facts, the omission of which makes this Draft Letter of offer as a whole or any of such information or the expression of any such opinions or intentions misleading in any material respect.</p>		
LISTING		
<p>The existing Equity Shares of our Company are listed on National Stock Exchange of India Limited (NSE). Our Company has received “in-principle” approval from NSE for listing the Equity Shares to be allotted pursuant to the Issue through its letter dated [●]. Our Company will also make an application to NSE to obtain its trading approval for the right entitlements as required under the SEBI circular bearing reference number SEBI/HO/CFD/DIL2/CIR/P/2020/13 dated January 22, 2020. For the purpose of this Issue, the Designated Stock Exchange is NSE.</p>		
ADVISOR TO THE ISSUE	REGISTRAR TO THE ISSUE	
 <p>NAVIGANT CORPORATE ADVISORS LIMITED 423, A Wing, Bonanza, Sahar Plaza Complex, J B Nagar, Andheri Kurla Road, Andheri East, Mumbai-400 059 Tel No. +91-22-41204837/49735078 Email Id- navigant@navigantcorp.com Investor Grievance Email: info@navigantcorp.com Website: www.navigantcorp.com SEBI Registration Number: INM000012243 Contact Person: Mr. Sarthak Vijlani</p>	 <p>MAS SERVICES LTD. T-34, 2nd Floor, Okhla Industrial Area, Phase - II, New Delhi - 110020, Tel No.: +91-11-26387281/82/83 Fax No.: +91-11-26387384 E-mail ID: info@masserv.com Website: www.masserv.com Contact Person: Mr. Sharwan Mangla SEBI Registration No: INR000000049</p>	
ISSUE PROGRAMME		
ISSUE OPENS ON	LAST DATE OF ON-MARKET RENONCIATIONS*	ISSUE CLOSES ON**
[●]	[●]	[●]

*Eligible Equity Shareholders are requested to ensure that renunciation through off-market transfer is completed in such a manner that the Rights Entitlements are credited to the demat account of the Renounee(s) on or prior to the Issue Closing Date.

**Our Board or a duly authorized committee thereof will have the right to extend the Issue period as it may determine from time to time but not exceeding 30 (thirty) days from the Issue Opening Date (inclusive of the Issue Opening Date). Further, no withdrawal of Application shall be permitted by any Applicant after the Issue Closing Date.

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AKG EXIM LIMITED
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SECTION I - GENERAL

DEFINITIONS AND ABBREVIATIONS

This Draft Letter of Offer uses the definitions and abbreviations set forth below, which you should consider when reading the information contained herein. The following list of certain capitalized terms used in this Draft Letter of Offer is intended for the convenience of the reader/prospective investor only and is not exhaustive.

References to any legislation, act, regulation, rules, guidelines or policies shall be to such legislation, act, regulation, rules, guidelines or policies as amended, supplemented, or re-enacted from time to time and any reference to a statutory provision shall include any subordinate legislation made from time to time under that provision.

The words and expressions used in this Draft Letter of Offer but not defined herein, shall have, to the extent applicable, the meaning ascribed to such terms under the Companies Act, 2013, the SEBI ICDR Regulations, the SCRA, the Depositories Act or the rules and regulations made thereunder. Notwithstanding the foregoing, terms used in "Statement of Special Tax Benefits" and "Financial Statements" beginning on pages 68 and 101, respectively of this Draft Letter of Offer, shall have the meaning given to such terms in such sections.

Company Related Terms

Terms	Description
"Akg Exim Limited" or "the Company" or "our Company" or "we" or "us" or "our" or "the Issuer"	Akg Exim Limited, a public limited company incorporated under the provisions of the Companies Act, 1956 and having its Registered Office at 7 th Floor, H.B. Twin Tower, Netaji Subhash Place, Pitampura, Delhi-110034.
Articles of Association	The Articles of Association of our Company as amended from time to time.
Auditors / Statutory Auditors	The Statutory Auditors of our Company being M/s. Dharam Taneja Associates, Chartered Accountant.
Board / Board of Directors / our Board	The Board of Directors of our Company or a duly constituted committee thereof, as the context may refer to.
Director(s)	Any or all the director(s) of our Board, as may be appointed from time to time.
Equity Shares / Shares	Equity Shares of face value of Rs. 10 each of our Company.
Internal Auditors	M/s. Sharma Sharma & Co., Chartered Accountants.
Key Managerial Personnel / KMP	Mrs. Mahima Goel, Whole Time Director, Mr. Rahul Bajaj, Chief Financial Officer and Ms. Mahak, Company Secretary and Compliance Officer, collectively referred as Key Managerial Personnel of the Company.
Memorandum of Association	The Memorandum of Association of our Company, as amended from time to time.
Promoter	Mr. Rajeev Goel
Promoter Group	Persons and entities forming part of the promoter group of our Company as determined in terms of Regulation 2(1)(pp) of the SEBI ICDR Regulations and as disclosed by our Company in the filings made with the Stock Exchange under the SEBI Listing Regulations.
Registered Office	Registered office of our Company situated at 7 th Floor, H.B. Twin Tower, Netaji Subhash Place, Pitampura, Delhi-110034.



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Terms	Description
Registrar of Companies / ROC	Registrar of Companies, Delhi, 4th Floor, IFCI Tower, 61, Nehru Place, New Delhi - 110019.
Subsidiary / Subsidiary Company / our Subsidiary	Our Company has two Subsidiary as on this date of filing of this Draft Letter of Offer namely, BKS Metalics Private Limited and Asri Trade Pte. Ltd.

Issue Related Terms

Term	Description
Abridged Letter of Offer or ALOF	The Abridged letter of offer to be sent to the Eligible Equity Shareholders as on the Record Date with respect to the Issue in accordance with the SEBI ICDR Regulations and the Companies Act.
Additional Rights Equity Shares / Additional Equity Shares	The Rights Equity Shares applied or allotted under this Issue in addition to the Rights Entitlement.
Allotment / Allot / Allotted / Allotment of Rights Equity Shares	The allotment of Rights Equity Shares pursuant to the Issue.
Allotment Account(s)	The account(s) opened with the Banker(s) to this Issue, into which the Application Money lying credit to the Escrow Account(s) and amounts blocked by Application Supported by Blocked Amount in the ASBA Account, with respect to successful Applicants will be transferred on the Transfer Date in accordance with Section 40(3) of the Companies Act, 2013.
Allotment Account Bank(s)	Bank(s) which are clearing members and registered with SEBI as bankers to an issue and with whom the Allotment Accounts will be opened, in this case being, [●]
Allotment Advice	The note or advice or intimation of Allotment sent to the Investors, who have been or are to be allotted the Rights Equity Shares after the basis of Allotment has been approved by the NSE.
Allotment Date	The date on which Allotment is made.
Allottee(s)	Persons to whom Rights Equity Shares of our Company are allotted pursuant to this Issue.
Applicant(s) / Investors	Eligible Shareholder(s) and/or Renouncee(s) who make an application for the Rights Equity Shares pursuant to the Issue in terms of the Letter of Offer.
Application	Application made through (i) submission of the Application Form or plain paper Application to the Designated Branch of the SCSBs or online/ electronic application through the website of the SCSBs (if made available by such SCSBs) under the ASBA process, to subscribe to the Rights Equity Shares at the Issue Price.
Application Form	Unless the context otherwise requires, an application form (including online application form available for submission of application through the website of the SCSBs (if made available by such SCSBs) under the ASBA process) used by an Applicant to make an application for the Allotment of Rights Equity Shares in this Issue.



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Term	Description
Application Money	Aggregate amount payable in respect of the Rights Equity Shares applied for in the Issue at the Issue Price.
Application Supported by Blocked Amount / ASBA	The application (whether physical or electronic) used by Investors to make an application authorizing the SCSB to block the amount payable on application in their specified bank account maintained with SCSB.
ASBA Account	An account maintained with an SCSB and specified in the CAF or plain paper application, as the case may be by the Applicant for blocking the amount mentioned in the CAF or in the plain paper application.
ASBA Circulars	Collectively, SEBI circular bearing reference number SEBI/CFD/DIL/ASBA/1/2009/30/12 dated December 30, 2009, SEBI circular bearing reference number CIR/CFD/DIL/1/2011 dated April 29, 2011 and the SEBI circular bearing reference number SEBI/HO/CFD/DIL2/CIR/P/2020/13 dated January 22, 2020.
Bankers to the Company	Axis Bank, Ground Floor, 1st To 3rd Floor, House No. 7333, 7334 & 7340, Plot No. 138, Ward No 12, Main GT Road, Prem Nagar, Delhi - 110007
Bankers to the Issue / Escrow Collection Bank	[•]
Banker to the Issue Agreement	Agreement dated [•] entered into by and amongst our Company, the Registrar to the Issue and the Bankers to the Issue for collection of the Application Money from Applicants/ Investors, transfer of funds to the Allotment Account and where applicable, refunds of the amounts collected from Applicants/Investors, on the terms and conditions thereof.
Basis of Allotment	The basis on which the Equity Shares will be Allotted to successful Applicants in consultation with the Designated Stock Exchange under this Issue, as described in "Terms of the Issue" beginning on page 156 of this Draft Letter of Offer.
CAF / Common Application Form	The application form used by Investors to make an application for Allotment under the Issue
Controlling Branches / Controlling Branches of the SCSBs	Such branches of the SCSBs which coordinate with the Registrar to the Issue and the Stock Exchange, a list of which is available on https://www.sebi.gov.in/sebiweb/other/OtherAction.do?doRecognisedFpi=yes&intmId=34
Designated Branches	Such branches of the SCSBs which shall collect application forms used by ASBA Investors and a list of which is available at http://www.sebi.gov.in/sebiweb/other/OtherAction.do?doRecognisedFpi=yes&intmId=34
Designated Stock Exchange	National Stock Exchange of India Limited
Depository	A depository registered with SEBI under the SEBI (Depository and Participant) Regulations, 2018, as amended from time to time, read with the Depositories Act, 2018.
Draft Letter of Offer / DLOF	This draft letter of offer dated 25 th May, 2022
ECS	Electronic Clearing Service



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Term	Description
Equity Shareholder(s)/ Shareholder(s)	The holders of Equity Shares of our Company.
Eligible Equity Shareholders / Eligible Shareholders/	Holders of Equity Shares of our Company as on the Record Date, i.e. [●].
Escrow Account(s)	One or more no-lien and non-interest-bearing accounts with the Escrow Collection Bank(s) for the purposes of collecting the Application Money from resident Investors.
"Escrow Collection Bank", "Allotment Account Bank(s)" or "Refund Bank(s)"	Bank(s) which are clearing members and registered with SEBI as banker to an issue and with whom the Escrow Account will be opened, in this case being, [●]
Fraudulent Borrower	A fraudulent borrower, as defined under the SEBI ICDR Regulations
General Corporate Purposes	General corporate purposes shall have the meaning as determined in Regulation 2(1)(r) of the SEBI ICDR Regulations.
GIR	General Index Registrar
IEPF	Investor Education and Protection Fund
Investor(s)	The Equity Shareholders of our Company on the Record Date i.e. [●] and the Renouncee(s).
ISIN	International securities identification number
Issue / the Issue / this Issue / Rights Issue	Issue of upto fully paid up [●] Equity Shares with a face value of Rs. 10 each for cash at a price of Rs. [●] per Equity Share aggregating up to Rs. 2800.00 Lakhs on a rights basis to Eligible Shareholders in the ratio of [●] ([●]) Rights Equity Shares for every [●] ([●]) fully paid-up Equity Share held on the Record Date i.e. [●].
Issue Closing Date	[●]
Issue Opening Date	[●]
Issue Price	Rs. [●] per Equity Share
Issue Proceeds	The gross proceeds raised through the Issue
Issue Size	The issue of upto fully paid up [●] Rights Equity Shares for an amount aggregating up to Rs. 2800.00 Lakhs.
Letter of Offer / LOF	The final letter of offer to be issued by our Company in connection with the Issue.
Listing Agreement	Uniform listing agreement entered into under the Listing Regulations between our Company and the Stock Exchange.
MICR	Magnetic Ink Character Recognition
Multiple Application Forms	Multiple application forms submitted by an Eligible Equity Shareholder/ Renouncee in respect of the Rights Entitlement available in their demat account. However, supplementary applications in relation to further Equity Shares with/without using additional Rights Entitlement will not be treated as multiple application.
NAV	Net Asset Value calculated as Net Worth divided by number of fully paid-up Equity Shares.



Term	Description
Net Proceeds	The Issue Proceeds less the Issue related expenses. For further details, please refer to the chapter titled “Objects of the Issue” beginning on page 62 of this Draft Letter of Offer.
Net Worth	Net worth as defined under Section 2(57) of the Companies Act.
Non Institutional Investor(s)	Investor, including any company or body corporate, other than a Retail Individual Investor and a QIB.
Offer Document	The Draft Letter of Offer, Letter of Offer, Abridged Letter of Offer including any notices, corrigenda thereto.
Off Market Renunciation	The renunciation of Rights Entitlements undertaken by the Investor by transferring them through off-market transfer through a depository participant in accordance with the SEBI Rights Issue Circulars and the circulars issued by the Depositories, from time to time, and other applicable laws.
On Market Renunciation	The renunciation of Rights Entitlements undertaken by the Investor by trading them over the secondary market platform of the Stock Exchanges through a registered stock broker in accordance with the SEBI Rights Issue Circulars and the circulars issued by the Stock Exchanges, from time to time, and other applicable laws, on or before [●]
QIBs / Qualified Institutional Buyers	Qualified Institutional Buyers as defined under Regulation 2(1)(ss) of the SEBI ICDR Regulations.
Record Date	A record date fixed by our Company for the purposes of determining the names of the Equity Shareholders who are eligible for the issue of Rights Equity Shares i.e. [●].
Registered Foreign Portfolio Investors / Foreign Portfolio Investors / Registered FPIs / FPIs	Foreign portfolio investors as defined under the SEBI (Foreign Portfolio Investors) Regulations, 2014.
Registrar to the Issue / Registrar and Transfer Agent / RTA	MAS Services Limited
Registrar Agreement	Agreement dated 24 th May, 2022 between our Company and the Registrar to the Issue in relation to the responsibilities and obligations of the Registrar to the Issue pertaining to this Issue.
Renouncee(s)	Person(s) who has / have acquired Rights Entitlements from the Eligible Equity Shareholders.
Renunciation Period	The period during which the Investors can renounce or transfer their Rights Entitlements which shall commence from the Issue Opening Date. Such period shall close on [●] in case of Market Renunciation. Eligible Equity Shareholders are requested to ensure that renunciation through off-market transfer is completed in such a manner that the Rights Entitlements are credited to the demat account of the Renouncee on or prior to the Issue Closing Date.
Retail Individual Investor(s)	Individual Investors who have applied for Rights Equity Shares for an amount less than or equal to Rs. 200,000 (including HUFs applying through their karta).



Term	Description
Rights Entitlements (Res)	The number of Rights Equity Shares that an Eligible Equity Shareholder is entitled to in proportion to the number of Equity Shares held by such Eligible Equity Shareholder on the Record Date.
Rights Equity Shares / Rights Shares	The equity shares of face value Rs. 10 each of our Company offered and to be issued and allotted pursuant to the Issue.
Rights Entitlement Letter	Letter including details of Rights Entitlements of the Eligible Equity Shareholders. The Rights Entitlements are also accessible through on the website of our Company.
Self-Certified Syndicate Bank / SCSBs	The banks which are registered with SEBI under the Securities and Exchange Board of India (Bankers to an Issue) Regulations, 1994, as amended, and offer the facility of ASBA, including blocking of bank account and a list of which is available on http://www.sebi.gov.in/sebiweb/other/OtherAction.do?doRecognisedFpi=yes&intmld=34
Share Certificate	The certificate in respect of the Rights Equity Shares allotted to a folio in a physical form.
Stock Exchange/ Stock Exchange(s)	NSE, where the Equity Shares of our Company are presently listed being NSE.
Transfer Date	The date on which the Application Money held in the Escrow Account and the Application Money blocked in the ASBA Account will be transferred to the Allotment Account(s) in respect of successful Applications, upon finalization of the Basis of Allotment, in consultation with the Designated Stock Exchange.
Willful Defaulter	Willful Defaulter as defined under Regulation 2(1)(lll) of the SEBI ICDR Regulations.
Working Days	In terms of Regulation 2(1)(mmm) of SEBI ICDR Regulations, working day means all days on which commercial banks in Mumbai are open for business. Further, in respect of Issue Period, working day means all days, excluding Saturdays, Sundays and public holidays, on which commercial banks in Mumbai are open for business. Furthermore, the time period between the Issue Closing Date and the listing of Equity Shares on the Stock Exchanges, working day means all trading days of the Stock Exchanges, excluding Sundays and bank holidays, as per circulars issued by SEBI.

Business and Industry related Terms / Abbreviations

Term	Description
CAGR	Compound Annual Growth Rate
ASSOCHAM	Associated Chambers of Commerce and Industry
CPF	Charoen Pokphand Foods
CPI	Consumer Price Index
CSO	Central Statistics Organization
CWC	Central Warehousing Corporation
DAC	Department of Agriculture & Cooperation



Term	Description
EBITDA	Earnings Before Interest, Tax, Depreciation & Amortization
EME	emerging market economies
EU	European Union
F&B	Food and Beverage
FY	Financial Year
GER	Gross Enrolment Ratio
GST	Goods and Services Tax
FCI	Food Corporation of India
FDI	Foreign direct investment
MCA	Masters of Computer Applications
FICCI	Federation of Indian Chambers of Commerce and Industry
MOSPI	Ministry of Statistics and Programme Implementation
NBA	National Board of Accreditation
FMCG	Fast Moving Consumable Goods
HMNEH	Horticulture Mission for North East & Himalayan States
IMF	International Monetary Fund
INR	Indian Rupee
ISO	International Organization for Standardization
MIDH	Mission for Integrated Development of Horticulture
Mn	Million
MNC	Multi National Corporation
MoFPI	Ministry of Food Processing Industries
MSP	Minimum Support Prices
MT	Metric Tone
NCCD	National Centre for Cold-chain Development
NHB	National Horticulture Board
PACS	Primary Agriculture Co-operative Society
QSR	Quick Service Restaurants
RBI	Reserve Bank of India
SCH	Single cross hybrid
SWC	State Warehousing Corporations
TFCP	Task Force on Cold-chain Projects
USA	United States of America
WDRA	Warehousing Development and Regulatory Authority

Conventional and General Terms or Abbreviations

Term	Description
“`” / “Rs.” / “Rupees” / “INR”	Indian Rupees
A/c	Account
AGM	Annual General Meeting
AIF(s)	Alternative investment funds, as defined and registered with SEBI under the SEBI AIF Regulations
AY	Assessment Year



Term	Description
BIFR	Board for Industrial and Financial Reconstruction
BSE	BSE Limited
CAGR	Compounded Annual Growth Rate
CARO	Companies (Auditor's Report) Order, 2016
CBIC	Central Board of Indirect Taxes and Customs
CDSL	Central Depository Services (India) Limited
Central Government	The Central Government of India
CFO	Chief Financial Officer
CIN	Corporate Identity Number
Companies Act	Companies Act, 2013, as amended from time to time
Companies Act, 1956	Companies Act, 1956 and the rules made thereunder, as the context requires
Companies Act, 2013	Companies Act, 2013 and the rules made thereunder
COVID-19 / Novel Coronavirus	A public health emergency of international concern as declared by the World Health Organization on January 30, 2020 and a pandemic on March 11, 2020
CRAR	Capital adequacy ratio/Capital to risk assets ratio
CrPC	Code of Criminal Procedure, 1973
CTS	Cheque Truncation System
Depositories Act	The Depositories Act, 2018 as amended from time to time
DIN	Director Identification Number
DP	Depository Participant as defined under the Depositories Act
DP ID	Depository Participant's Identity
EBITDA	Earnings before Interest, Tax, Depreciation and Amortisation
EPS	Earnings per Share
EGM	Extraordinary General Meeting
FCNR Account / FCNR	Foreign Currency Non Resident Account
FBIL	Financial Benchmarks India Private Limited
FDI	Foreign Direct Investment
FEMA Act / FEMA	Foreign Exchange Management Act, 1999 read with rules and regulations promulgated there under and any amendments thereto.
FEMA Regulations	Foreign Exchange Management (Transfer or Issue of Security by Person Resident Outside India) Regulations, 2017 as amended from time to time
FEMA Rules	Foreign Exchange Management (Non-debt Instruments) Rules, 2019
Fiscal /Fiscal Year/ Financial Year/FY	12 month period commencing from April 1 and ending on March 31 of the immediately succeeding year.
Fugitive Economic Offender	An individual who is declared a fugitive economic offender under section 12 of the Fugitive Economic Offenders Act, 2018
FPI	Foreign Portfolio Investor
FVCIs	Foreign venture capital investors as defined in and registered with SEBI under the SEBI FVCI Regulations.
GCP	General Corporate Purpose
Government/Gol	Government of India
GST	Goods and Service Tax
HFC	Housing finance companies



Term	Description
HUF	Hindu Undivided Family
IBC	Insolvency and Bankruptcy Code, 2016
ICAI	Institute of Chartered Accountants of India
IFRS	International Financing Reporting Standards
Ind AS	Indian Accounting Standards specified under Section 133 of the Companies Act, 2013 read with Companies (Indian Accounting Standards) Rules, 2015, as amended.
Indian GAAP	Generally accepted accounting principles followed in India.
Insider Trading Regulations	SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time
ISIN	International Securities Identification Number
ISRO	Indian Space Research Organisation
I.T. Act / IT Act	Income Tax Act, 1961
I. T. Rules	Income Tax Rules, 1962, as amended from time to time.
KMP	Key Managerial Personnel
Lakh	One hundred thousand
MCA	Ministry of Corporate Affairs, Government of India
Mutual Fund	Mutual fund registered with SEBI under the Securities and Exchange Board of (Mutual Funds) Regulations, 1996
NACH	National Automated Clearing House which is a consolidated system of ECS.
NBFC	Non-banking financial companies
NCD(s)	Non-convertible debentures
Net Worth	Aggregate of Equity Share capital and other equity
NCLT	National Company Law Tribunal
NCLAT	National Company Law Appellate Tribunal
NEFT	National Electronic Fund Transfer
N.A.	Not Applicable
NI Act	Negotiable Instruments Act, 1881
NR	Non Resident
NRE	Non Resident External Account
NRI	Non Resident Indian
NSDL	National Securities Depositories Limited
NSE	National Stock Exchange of India Limited
OCB	Overseas Corporate Body means and includes an entity defined in clause (xi) of Regulation 2 of the Foreign Exchange Management (Deposit) Regulations, 2000 and which was in existence on the date of the commencement of Foreign Exchange Management (Withdrawal of General Permission to Overseas Corporate Bodies (OCB's)) Regulations, 2003 and immediately prior to such commencement was eligible to undertake transactions pursuant to the general permission granted under the regulations.



Term	Description
p.a.	Per Annum
PAN	Permanent Account Number
PAT	Profit after tax
QP	Qualified purchaser as defined in the U.S. Investment Company Act
QIB	Qualified Institutional Buyer
RBI	Reserve Bank of India
RTGS	Real Time Gross Settlement
SCORES	SEBI Complaints Redress System
SCRA	The Securities Contracts (Regulation) Act, 1956, as amended from time to time
SCRR	The Securities Contracts (Regulation) Rules, 1957, as amended from time to time
SEBI	The Securities and Exchange Board of India, constituted under the SEBI Act, 1992
SEBI Act	The Securities and Exchange Board of India Act 1992, as amended from time to time
SEBI AIF Regulations	Securities and Exchange Board of India (Alternative Investment Funds) Regulations, 2012, as amended from time to time
SEBI FPI Regulations	Securities and Exchange Board of India (Foreign Portfolio Investors) Regulations, 2014, as amended from time to time
SEBI FVCI Regulations	Securities and Exchange Board of India (Foreign Venture Capital Investors) Regulations, 2000, as amended from time to time
SEBI ICDR Regulations /ICDR Regulations	Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended from time to time
SEBI Listing Regulations/ Listing Regulations	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time
SEBI Takeover Regulations/ SAST Regulations	Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended from time to time
SEBI VCF Regulations	Securities and Exchange Board of India (Venture Capital Funds) Regulations, 1996, as amended from time to time
SEBI Relaxation Circulars	SEBI circular bearing reference number SEBI/HO/CFD/DIL2/CIR/P/2020/78 dated May 6, 2020, read with SEBI circulars bearing reference numbers SEBI/HO/CFD/DIL1/CIR/P/2020/136 dated July 24, 2020 and SEBI/HO/CFD/DIL1/CIR/P/2021/13 dated January 19, 2021
SEBI Rights Issue Circulars	Collectively, SEBI circular, bearing reference number SEBI/HO/CFD/DIL2/CIR/P/2020/13 dated January 22, 2020, bearing reference number SEBI/HO/CFD/CIR/CFD/DIL/67/2020 dated April 21, 2020 and the SEBI Relaxation Circulars
STT	Securities transaction tax
SICA	Sick Industrial Companies (Special Provisions) Act, 1985.



Term	Description
Total Borrowings	Aggregate of debt securities, borrowings (other than debt securities) and subordinated liabilities
UPI	Unified Payments Interface
U.S./United States	The United States of America
USD / US\$	United States Dollars
US Securities Act	The United States Securities Act of 1933, as amended from time to time
VCFs	Venture capital funds as defined in and registered with the SEBI under the SEBI VCF Regulations or the SEBI AIF Regulations, as the case may be
WHO	World Health Organization

The words and expressions used but not defined herein shall have the same meaning as is assigned to such terms under the SEBI ICDR Regulations, the Companies Act, the SCRA, the Depositories Act and the rules and regulations made thereunder.



NOTICE TO INVESTORS

The distribution of this Draft Letter of Offer, the Abridged Letter of Offer, Application Form and Rights Entitlement Letter and the issue of Rights Entitlement and Rights Equity Shares to persons in certain jurisdictions outside India may be restricted by legal requirements prevailing in those jurisdictions. Persons into whose possession this Draft Letter of Offer, the Abridged Letter of Offer or Application Form may come are required to inform themselves about and observe such restrictions. Our Company is making this Issue on a rights basis to the Eligible Equity Shareholders and will dispatch through email and courier this Draft Letter of Offer / Abridged Letter of Offer, Application Form and Rights Entitlement Letter only to Eligible Equity Shareholders who have a registered address in India or who have provided an Indian address to our Company. Further, this Draft Letter of Offer will be provided, through email and courier, by the Registrar on behalf of our Company to the Eligible Equity Shareholders who have provided their Indian addresses to our Company or who are located in jurisdictions where the offer and sale of the Rights Equity Shares is permitted under laws of such jurisdictions and in each case who make a request in this regard. Investors can also access this Draft Letter of Offer, the Abridged Letter of Offer and the Application Form from the websites of the Registrar, our Company, the Stock Exchanges.

No action has been or will be taken to permit the Issue in any jurisdiction where action would be required for that purpose. Accordingly, the Rights Entitlements or Rights Equity Shares may not be offered or sold, directly or indirectly, and this Draft Letter of Offer, the Abridged Letter of Offer or any offering materials or advertisements in connection with the Issue may not be distributed, in whole or in part, in any jurisdiction, except in accordance with legal requirements applicable in such jurisdiction. Receipt of this Draft Letter of Offer or the Abridged Letter of Offer will not constitute an offer in those jurisdictions in which it would be illegal to make such an offer and, in those circumstances, this Draft Letter of Offer and the Abridged Letter of Offer must be treated as sent for information purposes only and should not be acted upon for subscription to the Rights Equity Shares and should not be copied or redistributed. Accordingly, persons receiving a copy of this Draft Letter of Offer or the Abridged Letter of Offer or Application Form should not, in connection with the issue of the Rights Equity Shares or the Rights Entitlements, distribute or send this Draft Letter of Offer or the Abridged Letter of Offer to any person outside India where to do so, would or might contravene local securities laws or regulations. If this Draft Letter of Offer or the Abridged Letter of Offer or Application Form is received by any person in any such jurisdiction, or by their agent or nominee, they must not seek to subscribe to the Rights Equity Shares or the Rights Entitlements referred to in this Draft Letter of Offer, the Abridged Letter of Offer or the Application Form.

Any person who makes an application to acquire the Rights Entitlements or the Rights Equity Shares offered in the Issue will be deemed to have declared, represented, warranted and agreed that such person is authorised to acquire the Rights Entitlements or the Rights Equity Shares in compliance with all applicable laws and regulations prevailing in his jurisdiction. Our Company, the Registrar or any other person acting on behalf of our Company reserves the right to treat any Application Form as invalid where they believe that Application Form is incomplete or acceptance of such Application Form may infringe applicable legal or regulatory requirements and we shall not be bound to allot or issue any Rights Equity Shares or Rights Entitlement in respect of any such Application Form.

Neither the delivery of this Draft Letter of Offer, the Abridged Letter of Offer, Application Form and Rights Entitlement Letter nor any sale hereunder, shall, under any circumstances, create any implication that there has been no change in our Company's affairs from the date hereof or the date of such information or that the information contained herein is correct as at any time subsequent to the



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date of this Draft Letter of Offer and the Abridged Letter of Offer and the Application Form and Rights Entitlement Letter or the date of such information.

THE CONTENTS OF THIS DRAFT LETTER OF OFFER SHOULD NOT BE CONSTRUED AS LEGAL, TAX OR INVESTMENT ADVICE. PROSPECTIVE INVESTORS MAY BE SUBJECT TO ADVERSE FOREIGN, STATE OR LOCAL TAX OR LEGAL CONSEQUENCES AS A RESULT OF THE OFFER RIGHTS OF EQUITY SHARES OR RIGHTS ENTITLEMENTS. ACCORDINGLY, EACH INVESTOR SHOULD CONSULT THEIR OWN COUNSEL, BUSINESS ADVISOR AND TAX ADVISOR AS TO THE LEGAL, BUSINESS, TAX AND RELATED MATTERS CONCERNING THE OFFER OF EQUITY SHARES. IN ADDITION, OUR COMPANY IS NOT MAKING ANY REPRESENTATION TO ANY OFFEREE OR PURCHASER OF THE EQUITY SHARES REGARDING THE LEGALITY OF AN INVESTMENT IN THE EQUITY SHARES BY SUCH OFFEREE OR PURCHASER UNDER ANY APPLICABLE LAWS OR REGULATIONS.

NO OFFER IN THE UNITED STATES

The Rights Entitlements and the Rights Equity Shares have not been and will not be registered under the Securities Act or the securities laws of any state of the United States and may not be offered or sold in the United States of America or the territories or possessions thereof (“**United States**”), except in a transaction not subject to, or exempt from, the registration requirements of the Securities Act and applicable state securities laws. The offering to which this Draft Letter of Offer relates is not, and under no circumstances is to be construed as, an offering of any Rights Equity Shares or Rights Entitlement for sale in the United States or as a solicitation therein of an offer to buy any of the Rights Equity Shares or Rights Entitlement. There is no intention to register any portion of the Issue or any of the securities described herein in the United States or to conduct a public offering of securities in the United States. Accordingly, this Draft Letter of Offer / Abridged Letter of Offer and the enclosed Application Form and Rights Entitlement Letters should not be forwarded to or transmitted in or into the United States at any time. In addition, until the expiry of 40 days after the commencement of the Issue, an offer or sale of Rights Entitlements or Rights Equity Shares within the United States by a dealer (whether or not it is participating in the Issue) may violate the registration requirements of the Securities Act.

Neither our Company nor any person acting on our behalf will accept a subscription or renunciation from any person, or the agent of any person, who appears to be, or who our Company or any person acting on our behalf has reason to believe is in the United States when the buy order is made. Envelopes containing an Application Form and Rights Entitlement Letter should not be postmarked in the United States or otherwise dispatched from the United States or any other jurisdiction where it would be illegal to make an offer, and all persons subscribing for the Rights Equity Shares Issue and wishing to hold such Equity Shares in registered form must provide an address for registration of these Equity Shares in India. Our Company is making the Issue on a rights basis to Eligible Equity Shareholders and this Draft Letter of Offer / Abridged Letter of Offer and Application Form and Rights Entitlement Letter will be dispatched only to Eligible Equity Shareholders who have an Indian address. Any person who acquires Rights Entitlements and the Rights Equity Shares will be deemed to have declared, represented, warranted and agreed that, (i) it is not and that at the time of subscribing for such Rights Equity Shares or the Rights Entitlements, it will not be, in the United States, and (ii) it is authorized to acquire the Rights Entitlements and the Rights Equity Shares in compliance with all applicable laws and regulations.

Our Company reserves the right to treat any Application Form as invalid which: (i) does not include the certification set out in the Application Form to the effect that the subscriber is authorised to acquire



the Rights Equity Shares or Rights Entitlement in compliance with all applicable laws and regulations; (ii) appears to us or our agents to have been executed in or dispatched from the United States; (iii) where a registered Indian address is not provided; or (iv) where our Company believes that Application Form is incomplete or acceptance of such Application Form may infringe applicable legal or regulatory requirements; and our Company shall not be bound to allot or issue any Rights Equity Shares or Rights Entitlement in respect of any such Application Form.



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PRESENTATION OF FINANCIAL AND OTHER INFORMATION

Certain Conventions

In this Draft Letter of Offer, unless otherwise specified or context otherwise requires, references to 'US\$', '\$', 'USD' and 'U.S. dollars' are to the legal currency of the United States of America, and references to 'INR', '₹', 'Rs.', 'Indian Rupees' and 'Rupees' are to the legal currency of India. All references herein to the 'US' or 'U.S.' or the 'United States' are to the United States of America and its territories and possessions. All references herein to 'India' are to the Republic of India and its territories and possessions and the references herein to 'Government' or 'GoI' or the 'Central Government' or the 'State Government' are to the Government of India, central or state, as applicable.

Financial Data

Unless stated or the context requires otherwise, our financial data included in this Draft Letter of Offer is derived from the Audited Standalone and Consolidated Financial Statements and Unaudited Standalone and Consolidated Financial Results. For further information, refer chapter titled "Financial Statements" on page 101.

We have prepared our Audited Standalone and Consolidated Financial Statements and Unaudited Standalone and Consolidated Financial Results in accordance with Indian Accounting Standards specified under Section 133 of the Companies Act, 2013 read with the Companies (Indian Accounting Standards) Rules, 2015, as amended. Our Company publishes its financial statements in Indian Rupees. Any reliance by persons not familiar with Indian accounting practices on the financial disclosures presented in this Draft Letter of Offer should accordingly be limited.

Our Company's Financial Year commences on April 1 of the immediately preceding calendar year and ends on March 31 of that particular calendar year. Accordingly, all references to a particular Financial Year or Fiscal, unless stated otherwise, are to the 12 months period ending on March 31 of that particular calendar year.

In this Draft Letter of Offer, any discrepancies in any table between the total and the sums of the amounts listed are due to rounding off, and unless otherwise specified, all financial numbers in parenthesis represent negative figures. Unless stated otherwise, throughout this Letter of Offer, all figures have been expressed in Lakhs.

Currency of Presentation

- All references to 'INR', '₹', 'Indian Rupees', 'Rs.' and 'Rupees' are to the legal currency of India.
- Any reference to 'US\$', 'USD', '\$' and 'U.S. dollars' are to the legal currency of the United States of America.

References to the singular also refer to the plural and one gender also refers to any other gender, wherever applicable. Unless stated otherwise, throughout this Draft Letter of Offer, all figures have been expressed in lakh.



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Market and Industry Data

Unless stated otherwise, industry and market data used in this Draft Letter of Offer have been obtained or derived from publicly available information. Publicly available Information generally state that the information contained in those publications has been obtained from sources believed to be reliable but that their accuracy and completeness are not guaranteed and their reliability cannot be assured. Accordingly, no investment decision should be made on the basis of such information. Although we believe that industry data used in this Draft Letter of Offer is reliable, it has not been independently verified and neither we, nor any of our affiliates, jointly or severally, make any representation as to its accuracy or completeness. The extent to which the market and industry data used in this Draft Letter of Offer is meaningful depends on the reader's familiarity with and understanding of the methodologies used in compiling such data. There are no standard data gathering methodologies in the industry in which we conduct our business, and methodologies and assumptions may vary widely among different industry sources. Such data involves risks, uncertainties and numerous assumptions and is subject to change based on various factors, including those disclosed in the section "Risk Factors" beginning on page 24 of this Draft Letter of Offer.

Conversion rates for foreign currency:

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

The following table sets forth, for the periods indicated, information with respect to the exchange rate between the Indian Rupee and other foreign currencies:

(Rs. per unit of Foreign Currency)

Sr. No.	Name of Currency	As on May 24, 2022	As on March 31, 2022	As on March, 31, 2021	As on March 31, 2020	As on March 31, 2019
1	U.S. Dollar	77.48	76.07	73.2035	75.325	69.5509

Source: <https://www.poundsterlinglive.com/>



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FORWARD LOOKING STATEMENTS

Our Company has included statements in this Draft Letter of Offer which contain words or phrases such as ‘anticipate’, ‘believe’, ‘continue’, ‘can’, ‘could’, ‘estimate’, ‘expect’, ‘expected to’, ‘future’, ‘intend’, ‘is likely’, ‘may’, ‘objective’, ‘plan’, ‘potential’, ‘project’, ‘pursue’, ‘shall’, ‘should’, ‘will’, ‘will continue’, ‘would’, or other words or phrases of similar import. Similarly, statements that describe our objectives, strategies, plans or goals are also forward looking statements. However, these are not the exclusive means of identifying forward looking statements. Forward-looking statements are not guarantees of performance and are based on certain assumptions, future expectations, describe plans and strategies, contain projections of results of operations or of financial condition or state other forward-looking information. All statements regarding our Company’s expected financial conditions, results of operations, business plans and prospects are forward-looking statements.

Forward-looking statements contained in this Draft Letter of Offer (whether made by our Company or any third party), are predictions and involve known and unknown risks, uncertainties, assumptions and other factors that may cause the actual results, performance or achievements of our Company to be materially different from any future results, performance or achievements expressed or implied by such forward-looking statements or other projections. Important factors that could cause actual results to differ materially from our Company’s expectations include, among others:

- Uncertainty of the continuing impact of the COVID-19 pandemic on our business and operations;
- Our ability to successfully implement our growth strategy and expansion plans, and to successfully launch and implement various business plans;
- Any failure or disruption of our information technology system;
- Increasing competition in or other factors affecting the industry segments in which our Company operates;
- Changes in laws and regulations relating to the industries in which we operate;
- Fluctuations in operating costs and impact on the financial results;
- Our ability to attract and retain qualified personnel;
- Changes in political and social conditions in India or in other countries that we may enter, the monetary and interest rate policies of India and other countries, inflation, deflation, unanticipated turbulence in interest rates, equity prices or other rates or prices; and
- General economic and business conditions in the markets in which we operate and in the local, regional, national and international economies.

Additional factors that could cause actual results, performance or achievements to differ materially include, but are not limited to, those discussed in the section titled “Risk Factors” beginning on page 24 of this Draft Letter of Offer. By their very nature, market risk disclosures are only estimates and could be materially different from what actually occurs in the future. As a result, actual future gains, losses or impact or net interest income and net income could materially differ from those that have been estimated, expressed or implied by such forward-looking statements or other projections.

Whilst we believe that the expectations reflected in such forward-looking statements are reasonable at this time, we cannot assure investors that such expectations will prove to be correct. Given these uncertainties, Investors are cautioned not to place undue reliance on such forward-looking statements. In any event, these statements speak only as of the date of this Draft Letter of Offer or the respective dates indicated in this Draft Letter of Offer, and our Company undertakes no obligation to update or revise any of them, whether as a result of new information, future events or otherwise. If any of these risks and uncertainties materialise, or if any of our Company’s underlying assumptions prove to be incorrect, the actual results of operations or financial condition of our Company could differ



materially from that described herein as anticipated, believed, estimated or expected. All subsequent forward- looking statements attributable to our Company are expressly qualified in their entirety by reference to these cautionary statements.

In accordance with SEBI / Stock Exchange requirements, our Company will ensure that Investors are informed of material developments until the time of the grant of listing and trading permission for the Rights Equity Shares by the Stock Exchange.



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SECTION II - SUMMARY OF DRAFT LETTER OF OFFER

The following is a general summary of certain disclosures included in this Draft Letter of Offer and is not exhaustive, nor does it purport to contain a summary of all the disclosures in this Draft Letter of Offer or all details relevant to the prospective investors. This summary should be read in conjunction with, and is qualified in its entirety by, the more detailed information appearing elsewhere in this Draft Letter of Offer, including, "Objects of the Issue", "Our Business", "Outstanding Litigation and other Defaults" and "Risk Factors" beginning on pages 62, 85, 118, and 24 respectively of this Draft Letter of Offer.

1. Summary of Business

Akg Exim Limited is a diversified merchant trading company in vast range of products & commodities with quality management system. Our Company is a merchandiser, distributor of variety of products including Non Basmati Rice, Metal Scrap, Aluminium scrap, Iron Scrap, Spices and Dry Fruits, etc. Our Company connects the seller and the markets, while ensuring lasting prosperity and sustainable supply at both ends. Our Company is catering to a large number of customers with concentration on Indian and overseas subcontinent. With a steady expansion in the market, company is consistently aiming to achieve its mission of providing world class customer services.

Our Company was originally incorporated at New Delhi as "Akg Exim Private Limited" on 26th July, 2005 under the provisions of the Companies Act, 1956 vide Certificate of Incorporation issued by the Asst. Registrar of Companies, NCT of Delhi & Haryana. Consequent upon the conversion of our Company to public limited company, the name of our Company was changed to "Akg Exim Limited" vide fresh certificate of incorporation dated 17th January, 2018 issued by the Registrar of Companies, Delhi.

AKG Exim Ltd is networked across the global continents and countries to span our growth of trading business in diversified product portfolio classified primarily in following categories:

Import / Export of Ferrous and Non-Ferrous Metal Scrap:

- Heavy Melting Steel Scrap As per ISRI, (HMS 1 & 2);
- Light Melting Scrap (Bundles, Lose);
- Cast Iron, Auto Purja;
- Aluminium Scrap; &
- other type of scrap, etc.

Local Trading of Agro Food commodities:

- Base Oil (for refineries to further fraction in Industrial, Automobiles use);
- Other petroleum-based chemicals
- Rice, spices & Dry Fruits.
- Toluene (Chemical);

Our Company is accredited with Federation of Indian Export Organisations Certificate (FIEO) and has been designated for the Agricultural and Processed Food Products Export Development Authority Certificate (APEDA) and also registered with Food Safety and Standards Authority of India under License under Food Safety and Standards Act, 2006 as an Importer.

We have ventured in health and wellness vertical by endorsing as exclusive channel partner of Immunity bloom which are health and nutritional supplement experts to develop best quality health



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products based on plant science and pure plant extracts. These products are developed by Saveer Biotech Ltd with their past experience of 10 years involving research & innovation to create high quality nourishing dietary fibre supplements for building healthy and better India. Our company has launched a new E-commerce portal in the name of <https://www.akghealth.com/>. Our Company via this E Commerce platform is reselling the products related to health supplements.

We have two subsidiary Companies, namely.:

- M/s. BKS Metalics Private Limited (BKS) is Subsidiary Company of the M/s AKG Exim Limited and company was incorporated in Delhi, India as on 01st September, 2020. BKS is engaged in diversified Manufacturing / Processing / Wholesaling in Ferrous and Non-Ferrous Metal Scraps. The Manufacturing Plant of the BKS is situated at Plot No. SP2-6(B), RIICO Industrial Area, Phase-I, Neemrana, Alwar 301705, Rajasthan.
- M/s. Asri Trade Pte. Ltd. (ASRI) a wholly owned subsidiary of M/s AKG Exim Limited and incorporated in Singapore as on 19th December, 2017. The registered office of ASRI is situated at 143 CECIL STREET #25-03 GB BUILDING SINGAPORE (069542). ASRI is a diversified trading company in vast range of products & commodities as a wholesaler of Ferrous & nonferrous Metal scrap, Lead Battery Scrap and Commissioning and indenting services in Singapore as well as with the rest of the world.

For further details, refer chapter titled “Our Business” on page 85.

2. Object of the Issue

Our Company intends to utilize the Net Proceeds for the following object:

(Amount in Lakhs)				
S.No.	Particulars	Amounts*	% of gross proceeds	% of Net proceeds
1.	To part finance incremental Working Capital of the Company.	Upto 2500.00	[•]*	[•]*
2.	To meet General corporate purposes.	[•]*	[•]*	[•]*
3.	To meet the expenses of the Issue.	[•]*	[•]*	[•]*
	Total	[•]*	[•]*	[•]*

**assuming full subscription*

For further details, refer chapter titled “Objects of the Issue” on page 62.

3. Intention and extent of participation by the Promoter and Promoter Group

The Promoter and members of the Promoter Group of our Company have, *vide* their letters dated 24th May, 2022 (“**Subscription Letters**”) indicated their intention to subscribe, jointly and / or severally to the full extent of their Rights Entitlement and subscribe to the full extent of any Rights Entitlement renounced in their favour by any other Promoter(s) or member(s) of the Promoter Group of our Company. For further details, please see the chapter titled “*Capital Structure*” beginning on page 59 of this Draft Letter of Offer.



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4. Auditor Qualifications

There are no qualifications, reservations and adverse remarks made by our Statutory Auditors in their report which requires any adjustment to Audited standalone and consolidated financial statements of the Company for the financial year 2020-21, 2019-20 and 2018-19.

5. Summary of outstanding litigations

S.No.	Outstanding Litigations	Amount (in Lakhs)
1.	Pending Litigations involving our Company and subsidiary Company	291.63
2.	Pending Dues to Revenue Departments	-
3.	Pending litigation with Revenue Departments	-

For further details, please see chapter titled “Outstanding Litigations and Other Defaults” beginning on page 118 of this Draft Letter of Offer.

6. Risk Factors

For details of the risks associated with our Company, ongoing business activities, objects of the Issue and material litigations which may impact our business, please see the section titled “Risk Factors” beginning on page 24 of this Draft Letter of Offer.

7. Contingent liabilities

As on March 31, 2021, there are no contingent liabilities of our Company. See “Financial Statements” beginning on page 101 of this Draft Letter of Offer.

8. Related party transactions

For details regarding our related party transactions as per Ind AS 24, see “Financial Statements” beginning on page 101 of this Draft Letter of Offer.

9. Financing Arrangements

There has been no financing arrangement whereby our Promoter, members of the Promoter Group, our Directors and their relatives have financed the purchase, by any other person, of securities of our Company other than in the normal course of the business of the financing entity during the period of 6 (six) months immediately preceding the date of this Draft Letter of Offer.

10. Issue of Equity Shares for consideration other than cash in last one year

Our Company has not issued any Equity Shares for consideration other than cash during the last one year immediately preceding the date of this Draft Letter of Offer.

11. Split / Consolidation

No Split or Consolidation was happened during the last one year.



12. EXEMPTION FROM COMPLYING WITH ANY PROVISIONS OF SECURITIES LAWS, IF ANY, GRANTED BY SEBI

Our Company has not submitted any application to SEBI for exemption from complying with any provisions of Securities.



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SECTION III - RISK FACTORS

An investment in our Equity Shares involves a high degree of risk. You should carefully consider each of the following risk factors and all other information set forth in this Draft Letter of Offer, including in "Our Business", "Industry Overview", "Management's Discussion and Analysis of Financial Condition and Results of Operations", and "Financial Statements" before making an investment in our Equity Shares.

The risks and uncertainties described below are not the only risks that we currently face. Additional risks and uncertainties not presently known to us or that we currently believe to be immaterial may also adversely affect our business, financial condition, results of operations and cash flows. If any or some combination of the following risks, or other risks that are not currently known or believed to be adverse, actually occur, our business, financial condition and results of operations could suffer, the trading price of, and the value of your investment in, our Equity Shares could decline and you may lose all or part of your investment. In making an investment decision with respect to this Issue, you must rely on your own examination of our Company and the terms of this Issue, including the merits and risks involved. You should consult your tax, financial and legal advisors about the consequences of an investment in our Equity Shares and its impact on you.

This Draft Letter of Offer also contains forward-looking statements that involve risks and uncertainties. Our results could differ materially from such forward-looking statements as a result of certain factors, including the considerations described below and elsewhere in this Draft Letter of Offer.

Unless specified or quantified in the relevant risk factors below, we are not in a position to quantify the financial or other implications of any of the risks described in this section. Unless the context otherwise requires, in this section, reference to "we", "us" "our" refers to our Company.

INTERNAL RISK FACTORS

BUSINESS RELATED RISK

1. **Our business and operations, and that of our suppliers, have been and may continue to be adversely affected by the COVID - 19 pandemic or other similar outbreaks, particularly if the economies of the countries in which we operate are affected for a significant amount of time.**

The outbreak, or threatened outbreak, of any severe communicable disease (particularly COVID-19) could materially adversely affect overall business sentiment and environment, particularly if such outbreak is inadequately controlled. The spread of any severe communicable disease could adversely affect our business, financial condition and results of operations. The outbreak of COVID-19 has resulted in authorities implementing several measures such as travel bans and restrictions, quarantines and shutdowns. These measures may have an impact on workforce and operations and the operations of our customers. A rapid increase in severe cases and deaths where measures taken by governments fail or are lifted prematurely, may further cause significant economic disruption across India.

The scope, duration and frequency of such measures and the adverse effects of COVID-19 remain uncertain and could be severe. Our ability to meet our ongoing disclosure obligations might be



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adversely affected, despite our best efforts. If any of our employees were suspected of contracting COVID-19 or any other epidemic disease, this could require us to quarantine some or all of these employees or disinfect the facilities used for our operations. In addition, our revenue and profitability could be impacted to the extent that a natural disaster, health epidemic or other outbreak harms the Indian economy in general. The outbreak has significantly increased economic uncertainty. It is likely that the current outbreak or continued spread of COVID-19 will cause an economic slowdown. The spread of COVID-19 has caused us to modify our business practices (including employee travel, employee work locations, and cancellation of physical participation in meetings, events and conferences), and we may take further actions as may be required by government authorities or that we determine are in the best interests of our employees and customers. There is no certainty that such measures will be sufficient to mitigate the risks posed by the outbreak. The extent to which COVID-19 further impacts our results will depend on future developments, which are highly uncertain and cannot be predicted, including new information which may emerge concerning the severity of the coronavirus and the actions taken to contain the coronavirus or treat its impact, among others. The degree to which COVID-19 may impact our results will depend on future developments, which are highly uncertain and cannot be predicted, including, but not limited to, the duration and spread of the outbreak, its severity, the actions taken to contain the outbreak or the ability to treat its impact, and how quickly and to what extent normal economic and operating conditions can resume.

The above risks can threaten the safe operation of our facilities and cause disruption of operational activities, loss of life, injuries and impact the wellbeing of our people. Further, if the outbreak of any of these epidemics or other severe epidemics, continues for an extended period, occur again and/or increases in severity, it could have an adverse effect on economic activity worldwide, and could materially and adversely affect our business, cash flows, financial condition and results of operations. Similarly, any other future public health epidemics or outbreak of avian or swine influenza or other contagious disease in India could also materially and adversely affect our business, cash flows, results of operations and financial condition. For these reasons, we cannot reasonably estimate the ultimate impact of COVID-19 on our business with any certainty nor can we provide any assurance that COVID-19 will not have a material adverse effect on our business, financial condition, results of operations and prospects. Moreover, to the extent that COVID-19 adversely affects our business, financial condition and results of operations, it may also have the effect of heightening other risks described in this “Risk Factors” section, including those relating to our indebtedness, ability to generate sufficient cash flows to fund our debt obligations, and our ability to comply with the covenants contained in the agreements that govern our indebtedness.

2. Our Company is involved in various litigation, the outcome of which could adversely affect our business and financial operations.

Summary of litigations are given below:

Particulars	No. of Cases/ Disputes	Approximate Aggregate Claim Amount (Rs. In Lakhs)
LITIGATION BY OR AGAINST OUR COMPANY		
Litigation filed by Our Company		



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Particulars	No. of Cases/ Disputes	Approximate Aggregate Claim Amount (Rs. In Lakhs)
Civil Cases filed by our Company	9	291.63
Criminal cases filed by our Company	-	-

If cases filed by our Company are not decided in favor of our Company, these entities would be deprived of claims receivable from counter party.

For details of the above litigation, please refer to the section titled "Outstanding Litigation" appearing on page 118 of this Draft Letter of offer.

3. There may be potential conflicts of interest if our Subsidiary Company(ies) are involved in any business activities that compete with or are in the same line of activity as our business operations.

M/s. Asri Trade Pte Limited and M/s. BKS Metals Private Limited, Subsidiary Companies of our Company is involved in similar line of business. Further, we have not entered into any non-compete agreement with our said entity. We cannot assure you that our Subsidiary Companies who has common interest in said entities will not favour the interest of the said entities As a result; conflicts of interests may arise in allocating business opportunities amongst our Company and our Subsidiary Companies in circumstances where our respective interests diverge. There can be no assurance that our Subsidiary Companies will not compete with our existing business or any future business that we may undertake or that their interests will not conflict with ours. Any such present and future conflicts could have a material adverse effect on our reputation, business, results of operations and financial condition which may adversely affect our profitability and results of operations.

4. Our Company is importing and exporting the goods to M/s Asri Trade Pte Limited.

M/s. Asri Trade Pte Limited ("ATPL") is involved in similar line of business. Further, Our Company is dealing with ATPL that our Company is regularly importing and exporting the products to ATPL for further distribution or Selling. Also, the revenue from ATPL was Rs. 36.95 Lakhs during the half year ended 30th September, 2021 and similarly Purchases from ATPL was Rs. 64.32 Lakhs during the half year ended 30th September, 2021. Further, we have not entered into any non-compete agreement with our ATPL. We cannot assure you that ATPL who has common interest in said entity will not favour the interest of the said entity, As a result; situation may arise in allocating business opportunities amongst our Company and ATPL in circumstances where our respective interests diverge. There can be no assurance that our ATPL will not compete with our existing business. Disruption of such present and future dealing could have a material adverse effect on our reputation, business, results of operations and financial condition which may adversely affect our profitability and results of operations. For further details of transaction with ATPL, please refer to Financial Information of Our Company on page 101 of Draft Letter of offer.



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5. We are highly dependent on our suppliers for uninterrupted supply of Products.

We do not manufacture any of the products that we trade in. As a trader our business is heavily depended on the products supplied by various Suppliers. We procure the products from various suppliers based on availability of desired quality, quantity and other financial terms. We are required to rely heavily on various suppliers and the quality of products supplied by them. Though we do not manufacture any product ourselves, we are reliant on our suppliers for giving us timely delivery, products of agreed quality and products as per our need. Our sales and profitability would be adversely affected in case of any management inabilities or errors on part of our suppliers.

Also, we may face the risk of the management of our supplier companies collaborating with some other trader and thus reducing our share of supply, which we cannot ensure would be as per our required terms. Any negative development involving our suppliers and their products, could adversely affect our business growth, profitability, results of operations and goodwill and we may not be in a position to alter or avoid such developments.

6. We are subject to foreign currency exchange rate fluctuations which could have a material and adverse effect on our results of operations and financial conditions.

We import our Metal Scrap outside India and payment for these purchases is made in foreign currency. We also export our products and receive sale proceeds in foreign currency. Changes in value of currencies with respect to the Rupee may cause fluctuations in our operating results expressed in Rupees. The exchange rate between the Rupee and other currencies is variable and may continue to fluctuate in future. Any adverse or unforeseen fluctuations with respect to the unhedged exchange rate of any foreign currency for Indian Rupees may affect our Company's results of operations.

7. We have in the past entered into related party transactions and may continue to do so in the future.

We have entered into transactions with our promoters, Promoter group, Subsidiary Companies. While we believe that all such transactions have been conducted on an arm's length basis, there can be no assurance that we could not have achieved more favourable terms had such transactions not been entered into with related parties. Furthermore, it is likely that we may enter into related party transactions in the future. There can be no assurance that such transactions, individually or in the aggregate, will not have an adverse effect on our financial condition and results of operations. For further details please refer to Financial Information Of Our Company on page 101 of Draft Letter of offer.

8. Our global sales and Purchases expose us to numerous regulatory requirements and are subject to Government Treaties and any adverse change in Government treaties could adversely affect global sales and Purchases, and thus could harm our business operations.

Since, Our Company is engaged in Importing and Exporting of Products and therefore, we are subject to numerous, legal requirements on matters as diverse as import/export controls, trade restrictions, Government Treaties, the tariffs, taxation, sanctions, government affairs, anti-corruption etc., Any adverse change in these matters, regulations etc. could result in disgorgement of profits, prohibitions on doing business and have an adverse impact on our business operations.



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However, we have been following laws of land and meet mandatory levels of product standards and safety.

9. Our trading activities are exposed to fluctuations in the prices of traded goods.

Our Company is dependent on third party suppliers for procuring the traded goods. We are exposed to fluctuations in the prices of these traded goods as well as its unavailability, particularly as we typically do not enter into any long term supply agreements with our suppliers and our major requirement is met in the spot market. We may be unable to control the factors affecting the price at which we procure the materials. We also face the risks associated with compensating for or passing on such increase in our cost of trades on account of such fluctuations in prices to our customers. Upward fluctuations in the prices of traded goods may thereby affect our margins and profitability, resulting in a material adverse effect on our business, financial condition and results of operations. Though we enjoy favourable terms from the suppliers both in prices as well as in supplies, our inability to obtain high quality materials in a timely and cost-effective manner would cause delays in our production/trade cycles and delivery schedules, which may result in the loss of our customers and revenues.

10. Any failure to fulfill the requirements of our international customers may adversely affect our revenues, result of operations and cash flows.

Our revenue is derived from Domestic trading and exports of goods. Our operations may be impacted by various risks inherent in international sales, including, failure of our global delivery service model, restrictions imposed on sale and purchase of our products by the Government of India or the respective governments where our customers are located and economic, political or regulatory uncertainty, currency exchange rate fluctuations and varied regulatory framework and requirements. To the extent that we are unable to effectively manage our global operations and risks, we may be unable to maintain our revenue and profitability, or we may be subject to additional unanticipated costs or legal or regulatory action. As a consequence, our business, financial condition, results of operations and cash flows may be adversely affected.

11. The laws of various countries govern our customer contracts and disputes arising from such contracts may be subject to the exclusive jurisdiction of courts situated in such countries.

Several of our purchase orders executed with our customers are governed by the laws of the country in which either the customer is incorporated or where the business of the customer is situated and any disputes related to such contracts may be subject to the exclusive jurisdiction of courts situated in such countries. Lawsuits with respect to such disputes may be instituted in courts situated outside India, and it may become unfeasible for our Company to manage such litigation or obtain enforcement of awards made in such suits. Further, we may also incur significant litigation costs as a result of pursuing dispute resolution mechanisms outside India.

12. The Registered Office of Our Company is not owned by us.

Our registered office is situated at 7th Floor, H.B. Twin Tower, Netaji Subhash Place, Pitampura, Delhi-110034 which has been taken on lease. Any discontinuance of facility to use the office will lead us to locate any other premises. Our inability to identify the new premises may adversely affect the operations, finances and profitability of our Company.



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13. We have experienced negative cash flows and any negative cash flows in the future could adversely affect our financial conditions and results of operations.

The detailed break up of cash flows as per audited financials is summarized in below mentioned table and our Company has reported negative cash flow in certain financial years and which could affect our business and growth:

On standalone basis

(Amount in Lakhs)

Particulars	30.09.2021	31.03.2021	31.03.2020	31.03.2019
Net Cash flow from Operating activities	(27.75)	(206.89)	1109.93	129.04
Net Cash Flow from investing activities	(15.26)	1.77	1018.27	(72.53)
Net Cash Flow from Financing activities	43.91	(129.85)	(2070.54)	(80.48)
Net Cash Flow for the Year	0.90	(334.97)	57.66	(223.29)

On Consolidated basis

(Amount in Lakhs)

Particulars	30.09.2021	31.03.2021
Net Cash flow from Operating activities	(93.96)	(146.10)
Net Cash Flow from investing activities	50.83	(116.20)
Net Cash Flow from Financing activities	43.91	(64.85)
Net Cash Flow for the Year	0.78	(327.15)

14. We are a listed company and are required to comply with rules and regulations imposed by the Stock Exchanges and SEBI with respect to continuous listing and the Companies Act. Any failure to comply with such rules and regulations or any wrong disclosure made to the Stock Exchange or any statutory authority could result in penalties being imposed on us, which may adversely affect our business and operations.

As a listed company, we are required to comply with certain conditions for continuous listing under the SEBI Listing Regulations and other rules and regulations imposed by SEBI, which require us to make certain periodic disclosures, including disclosures about any material events or occurrences with respect to our Company, disclosure of our financial statements and disclosure of our updated shareholding pattern. Any failure to comply with these continuous disclosure requirements or any wrongful disclosure made by us to the Stock Exchange or any other statutory authority may lead to penalties being imposed on us.

There has been, on few occasions, inadvertent Non Compliances/ Delay Compliances done by our Company as required under the provisions of SEBI LODR Regulations, Insider Trading Regulations, SEBI Takeover Regulations. We believe, we are in compliance with rules and regulations imposed by the NSE and SEBI with respect to continuous listing, any failure to comply with such rules and regulations or any wrong disclosure/ Non filing/ Delay Filing to the NSE or any statutory authority could result in penalties being imposed on us, which may adversely affect our business and operations.



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15. As on the date of this Draft Letter of Offer, no investor complaint is outstanding on SCORES.

As on the date of this Draft Letter of Offer, no investor complaint is outstanding on SCORES. But there is no assurance that in future the Company will be able to resolve each and every investor complaint received on SCORES. For detailed information of the no. of Investor Complaints received and resolved by the Company, kindly refer to page 130 of this Draft letter of letter.

16. Changes in technology may render our current technologies obsolete or require us to make substantial capital investments.

Modernization and technology up gradation is essential to reduce costs and increase the efficiency. Our technology may become obsolete or may not be upgraded timely, hampering our operations and financial conditions and we may lose our competitive edge. Although we believe that we are utilizing latest technology by using latest machineries and equipments, we shall continue to strive to keep our technology updated. In case of a new found technology in the cattle feed and allied sector, we may be required to implement new technology employed by us. Further, the cost in upgrading our technology is significant which could substantially affect our finances and operations.

17. We could be harmed by employee misconduct or errors that are difficult to detect and any such incidences could adversely affect our financial condition, results of operations and reputation.

Employee misconduct or errors could expose us to business risks or losses, including regulatory sanctions and cause serious harm to our reputation. There can be no assurance that we will be able to detect or deter such misconduct. Moreover, the precautions we take to prevent and detect such activity may not be effective in all cases. Our employees and agents may also commit errors that could subject us to claims and proceedings for alleged negligence, as well as regulatory actions on account of which our business, financial condition, results of operations and goodwill could be adversely affected.

18. We face risks and uncertainties associated with the implementation of expansion and new projects which may impact our business, operations and revenue.

Our business plan includes expansion of our geographical reach and enter the large domestic market for growth opportunities and thereby increase the revenue. We may face risks and uncertainties in relation to expansion and achieving our business plans efficiently, which may include various factors i.e. we may face difficulties in recruiting, training and retaining sufficient skilled faculty members, technical and management personnel and inability to or difficulty in satisfying clients expectations . This may adversely affect our business, results of operation and revenues.

19. Our ability to retain the clients is heavily dependent upon various factors including our reputation and our ability to maintain a high level of service quality including our satisfactory performance for the customers. Any failure by us to retain or attract customers may impact its business and revenues.

We believe our strong brand reputation has helped us to attract and retain our customers. As a result, our reputation and perception of our brands are critical to our business. Although, we believe that we as well as our customers have a dedicated and talented team that comprise of



experienced personnel in the field of cattle feed and animal supplements. Our business heavily relies on our reputation as well as the quality and popularity of the product provided by us and our visibility and perception amongst customers. It is important that we retain the trust placed by our customers. We must also continue to attract more and increase the number of our customers at a consistent rate. We attempt to retain our position by maintaining quality and by our ability to improve and add value to the performance of our customers in their respective areas. This requires constant upgradation of the methodology and manufacturing technologies are adequately equipped. Further, we rely on a variety of advertising efforts tailored to target the customers. Failure to maintain and enhance our reputation or any actual or perceived reasons leading to reduction of benefits from our customers or any negative publicity against us may affect the rate of customers. Any failure by us to retain or attract customers may adversely impact our business and revenues.

20. Our Company's failure to maintain the quality standards of the products could adversely impact our business, results of operations and financial condition.

The demand for our products depends on quality that we manufacture and market. Any failure of ours to maintain the quality standards may affect our business. Although we have put in place strict quality control procedures, we cannot assure that our products will always be able to satisfy our customer's quality standards. Any negative publicity regarding our Company, or products, including those arising from any deterioration in quality of our products or any other unforeseen events could adversely affect our reputation, our operations and our results from operations.

21. Delays or defaults in client payments could result in a reduction of our profits.

We may be subject to working capital shortages due to delays or defaults in payments by clients. If clients default in their payments in due time to which we have devoted significant resources it could have a material adverse effect on our business, financial condition and results of operations and could cause the price of our Equity Shares to decline.

22. Changes in customer preferences could affect our business, financial condition, results of operations and prospects.

Any change in the customer preference can render our old stock obsolete, as changes in customer preference are generally beyond our control. Some or all of our products may become less attractive in light of changing customer preferences or better products by competitors and we may be unable to adapt to such changes in a timely manner. However, we constantly focus on research and development and to develop new products to cater the customer needs, any change in customer preferences that decreases demand could affect our business, financial condition, results of operations and prospects.

23. We could become liable to customers, suffer adverse publicity and incur substantial costs as a result of defects in our products, which in turn could adversely affect the value of our brand, and our sales could be diminished if we are associated with negative publicity.

Any failure or defect in our products could result in a claim against us for damages, regardless of our responsibility for such a failure or defect. We currently carry no products liability insurance with respect to our products. Although we attempt to maintain quality standards, we cannot assure



that all our products would be of uniform quality, which in turn could adversely affect the value of our brand, and our sales could be diminished if we are associated with negative publicity.

Also, our business is dependent on the trust our customers have in the quality of our products. Any negative publicity regarding our company, brand, or products, including those arising from a drop in quality of merchandise from our vendors, mishaps resulting from the use of our products, or any other unforeseen events could affect our reputation and our results from operations.

24. Our lenders have charge over our immovable properties in respect of finance availed by us.

We have provided security in respect of loans / facilities availed by us from banks and financial institutions by creating a charge over our immovable properties. The total amounts outstanding and payable by us as secured loans were Rs. 955.05 lacs as on 31st March, 2021. In the event we default in repayment of the loans / facilities availed by us and any interest thereof, our properties may be subject to forfeiture by lenders, which in turn could have significant adverse effect on business, financial condition or results of operations. For further details of secured loans of our Company, please refer the chapter titled *Financial Information* on page 101 of this Draft Letter of offer.

25. Our Directors, Promoter, Relative to our Promoters have provided personal guarantees to certain loan facilities availed by us, which if revoked may require alternative guarantees, repayment of amounts due or termination of the facilities.

Our Directors, Promoter and relative of our Promoter have provided personal guarantees in relation to certain loan facilities availed of by us. In the event that any of these guarantees are revoked, the lenders for such facilities may require alternate guarantees, repayment of amounts outstanding under such facilities, or may even terminate such facilities. We may not be successful in procuring alternative guarantees satisfactory to the lenders, and as a result may need to repay outstanding amounts under such facilities or seek additional sources of capital, which may not be available on acceptable terms or at all and any such failure to raise additional capital could affect our operations and our financial condition.

26. Termination of agreements/arrangements with Customers, could negatively impact our revenues and profitability.

Our customers typically retain us on a non-exclusive basis. Many of our client contracts can be terminated with or without cause by providing notice and without termination-related penalties. Additionally, most of clients carry no commitment to a specific volume of business or future work. Our business is dependent on the decisions and actions of our customers, and there are a number of factors relating to our clients that are outside our control that might result in the termination of an assignment or the loss of a client, including a demand for price reductions. Therefore, our business may be adversely affected if any of our contracts are terminated by our customers.

27. Our Company is dependent on third party transportation providers for the delivery of our goods and any disruption in their operations or a decrease in the quality of their services could affect our Company's reputation and results of operations.

Our Company uses third party transportation providers for delivery of our goods. Though our business has not experienced any disruptions due to transportation strikes in the past, any future



transportation strikes may have an adverse effect on our business. In addition goods may be lost or damaged in transit for various reasons including occurrence of accidents or natural disasters. There may also be delay in delivery of products, which may also affect our business and results of operation negatively. An increase in the freight costs or unavailability of freight for transportation of our raw materials or finished goods may have an adverse effect on our business and results of operations.

Further, disruptions of transportation services due to weather related problems, strikes, lock-outs, inadequacies in the road infrastructure, or other events could impair ability to procure raw materials on time. Any such disruptions could materially and adversely affect our business, financial condition and results of operations.

- 28. While we are currently not subject to extensive Governmental regulation, any regulatory or legal framework introduced in the future may increase our compliance requirements and costs, which may adversely affect our business, results of operations and prospects. However, to run our business, we require certain regulatory permits and approval to operate.**

At present, the segments in which we operate are not subject to extensive Government regulation. While we are not in a position to predict the likelihood, timing or content of any such regulation or legislation, if any such regulation or legislation is notified, we may be affected in various ways. However, we have obtained all permits and licenses, which are adequate to run our business. Further, some of these approvals are granted for fixed periods of time and need renewal from time to time. We are required to renew such permits, licenses and approvals. There can be no assurance that the relevant authorities will issue any of such permits or approvals in time or at all. Failure by us to renew, maintain or obtain the required permits or approvals in time may result in the interruption of our operations and may have a material adverse effect on our business.

- 29. Our success depends largely on our senior management and our ability to attract and retain our key personnel.**

Our success depends on the continued services and performance of the members of our management team and other key employees. Competition for senior management in the industry is intense, and we may not be able to retain our existing senior management or attract and retain new senior management in the future. The loss of the services of our Promoter could seriously impair our ability to continue to manage and expand our business. Further, the loss of any other member of our senior management or other key personnel may adversely affect our business, results of operations and financial condition. We do not maintain key man's life insurance for our Promoters, senior members of our management team or other key personnel.

- 30. The industry segments in which we operate being fragmented, we face competition from other players, which may affect our business operations and financial conditions.**

The industry in which we operate is highly competitive. Factors affecting our competitive success include, amongst other things, price, demand for our products, availability of raw materials, brand recognition and reliability. Our competitors vary in size, and may have greater financial, production, marketing, personnel and other resources than us and certain of our competitors have a longer history of established businesses and reputations in the Indian market as compared with us. Competitive conditions in some of our segments have caused us to incur lower net selling prices and reduced gross margins and net earnings. These conditions may continue indefinitely. Changes



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in the identity, ownership structure, and strategic goals of our competitors and the emergence of new competitors in our target markets may impact our financial performance. New competitors may include foreign-based companies and domestic producers who could enter our markets.

Our failure to compete effectively, including any delay in responding to changes in the industry and market, together with increased spending on advertising, may affect the competitiveness of our products, which may result in a decline in our revenues and profitability.

31. Insurance coverage obtained by us may not adequately protect us against unforeseen losses.

We have maintained insurance coverage of our assets and accident policies. We believe that the insurance coverage maintained, would reasonably cover all normal risks associated with the operation of our business, however, there can be no assurance that any claim under the insurance policies maintained by us will be met fully, in part or on time. In the event we suffer loss or damage that is not covered by insurance or exceeds our insurance coverage, our results of operations and cash flow may be adversely affected.

32. There is no monitoring agency appointed by our Company and the deployment of funds are at the discretion of our Management and our Board of Directors, though it shall be monitored by the Audit Committee.

As per SEBI (ICDR) Regulations, 2018 appointment of monitoring agency is required only for Issue size above Rs. 10,000 Lacs. Hence, we have not appointed a monitoring agency to monitor the utilization of Issue proceeds. However, the audit committee of our Board will monitor the utilization of Issue proceeds. Further, our Company shall inform about material deviations in the utilization of Issue proceeds to the NSE and shall also simultaneously make the material deviations / adverse comments of the audit committee public.

33. We may not be successful in implementing our business and growth strategies.

The success of our business depends substantially on our ability to implement our business and growth strategies effectively. Even though we have successfully executed our business strategies in the past, there is no guarantee that we can implement the same on time and within the estimated budget going forward, or that we will be able to meet the expectations of our targeted customers. Changes in regulations applicable to us may also make it difficult to implement our business strategies.

Further, our growth strategies could place significant demand on our management team and other resources and would require us to continuously develop and improve our operational, financial and other controls, none of which can be assured. Failure to implement our business and growth strategies would have a material adverse effect on our business and results of operations.

34. Delay in raising funds from the Right issue could adversely impact the implementation schedule.

The proposed expansion, as detailed in the section titled “*Objects of the Issue*” is to be funded from the proceeds of this Issue. We have not identified any alternate source of funding and hence any failure or delay on our part to mobilize the required resources or any shortfall in the Issue proceeds may delay the implementation schedule. We therefore, cannot assure that we would be able to execute the expansion process within the given time frame, or within the costs as originally



estimated by us. Any time overrun or cost overrun may adversely affect our growth plans and profitability.

- 35. The Objects of the Issue for which funds are being raised, are based on our management estimates and any bank or financial institution or any independent agency has not appraised the same. The deployment of funds in the project is entirely at our discretion, based on the parameters as mentioned in the chapter titles “Objects of the Issue”.**

The fund requirement and deployment, as mentioned in the “Objects of the Issue” on page 62 of this Draft Letter of Offer is based on the estimates of our management and has not been appraised by any bank or financial institution or any other independent agency. These fund requirements are based on our current business plan. We cannot assure that the current business plan will be implemented in its entirety or at all. In view of the highly competitive and dynamic nature of our business, we may have to revise our business plan from time to time and consequently these fund requirements. The deployment of the funds as stated under chapter “Objects of the Issue” is at the discretion of our Board of Directors and is not subject to monitoring by any external independent agency. Further, we cannot assure that the actual costs or schedule of implementation as stated under chapter “Objects of the Issue” will not vary from the estimated costs or schedule of implementation. Any such variance may be on account of one or more factors, some of which may be beyond our control. Occurrence of any such event may delay our business plans and/or may have an adverse bearing on our expected revenues and earnings.

- 36. Our future fund requirements, in the form of further issue of capital or securities may be prejudicial to the interest of the Shareholders depending upon the terms on which they are eventually raised.**

We may require additional capital from time to time depending on our business needs. Any further issue of Equity Shares or convertible securities would dilute the shareholding of the existing Shareholders and such issuance may be done on terms and conditions, which may not be favourable to the then existing Shareholders. If such funds are raised in the form of loans or debt or preference shares, then it may substantially increase our fixed interest/dividend burden and decrease our cash flows, thus adversely affecting our business, results of operations and financial condition.

- 37. Our Company’s ability to pay dividends in the future will depend upon future earnings, financial condition, cash flows, working capital requirements and capital expenditures.**

Our Company has not been a dividend paying Company. Further, the amount of future dividend payments, if any, will depend upon our Company’s future earnings, financial condition, cash flows, working capital requirements, the terms and conditions of our Company’s indebtedness and capital expenditures. There can be no assurance that our Company will be able to pay dividends in the future.

- 38. We have not independently verified certain data in this Draft Letter of offer.**

We have not independently verified data from industry publications contained herein and although we believe these sources to be reliable, we cannot assure you that they are complete or reliable. Such data may also be produced on a different basis from comparable information compiled with regard to other countries. Therefore, discussions of matters relating to India and its economy are



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subject to the caveat that the statistical and other data upon which such discussions are based have not been verified by us and may be incomplete or unreliable.

39. Our Company will not distribute the Draft Letter of Offer and Application Form to certain overseas Shareholders who have not provided an address in India for service of documents.

Our Company will dispatch this Draft Letter of Offer, the Abridged Letter of Offer, Rights Entitlement Letter and Application Form (the "Offering Materials") to such Shareholders who have provided an address in India for the service of documents. The Offering Materials will not be distributed to addresses outside India on account of restrictions that apply to the circulation of such materials in various overseas jurisdictions. However, the Companies Act requires companies to serve documents at any address, which may be provided by the members as well as through e-mail. Presently, there is a lack of clarity under the Companies Act, 2013, and the rules thereunder, with respect to the distribution of Offering Materials to retail individual shareholders in overseas jurisdictions where such distribution may be prohibited under applicable laws of such jurisdictions.

ISSUE RELATED RISK

40. SEBI has recently, by way of circulars dated January 22, 2020, May 6, 2020, January 19, 2021 and April 22, 2021, streamlined the process of rights issues. You should follow the instructions carefully, as stated in such SEBI circulars and in this Draft Letter of Offer.

The concept of crediting Rights Entitlements into the demat accounts of the Eligible Equity Shareholders has recently been introduced by the SEBI. Accordingly, the process for such Rights Entitlements has been recently devised by capital market intermediaries. Eligible Equity Shareholders are encouraged to exercise caution, carefully follow the requirements as stated in the SEBI circulars dated January 22, 2020, May 6, 2020 and January 19, 2021 and April 22, 2021, and ensure completion of all necessary steps in relation to providing/updating their demat account details in a timely manner. For details, see "Terms of the Issue" on page 132 of this Draft Letter of Offer. In accordance with Regulation 77A of the SEBI ICDR Regulations read with the SEBI Rights Issue Circular, the credit of Rights Entitlements and Allotment of Rights Equity Shares shall be made in dematerialized form only. Prior to the Issue Opening Date, our Company shall credit the Rights Entitlements to (i) the demat accounts of the Eligible Equity Shareholders holding the Equity Shares in dematerialised form; and (ii) a demat suspense escrow account opened by our Company, for the Eligible Equity Shareholders which would comprise Rights Entitlements relating to (a) Equity Shares held in a demat suspense account pursuant to Regulation 39 of the SEBI Listing Regulations; or (b) Equity Shares held in the account of IEPF authority; or (c) the demat accounts of the Eligible Equity Shareholder which are frozen or details of which are unavailable with our Company or with the Registrar on the Record Date; or (d) credit of the Rights Entitlements returned/reversed/failed; or (e) the ownership of the Equity Shares currently under dispute, including any court proceedings.

41. You may not receive the Equity Shares that you subscribe in the Issue until fifteen days after the date on which this Issue closes, which will subject you to market risk.

The Equity Shares that you subscribe in the Issue may not be credited to your demat account with the depository participants until approximately 15 days from the Issue Closing Date. You can start trading such Equity Shares only after receipt of the listing and trading approval in respect thereof. There can be no assurance that the Equity Shares allocated to you will be credited to your demat



account, or that trading in the Equity Shares will commence within the specified time period, subjecting you to market risk for such period.

42. There is no guarantee that our Equity Shares will be listed in a timely manner or at all which may adversely affect the trading price of our Equity Shares.

In accordance with Indian law and practice, final approval for listing and trading of the Equity Shares will not be granted by the Stock Exchanges until after those Equity Shares have been issued and allotted. Approval will require all relevant documents authorizing the issuing of Equity Shares to be submitted. There could be a failure or delay in listing the Equity Shares on Stock Exchanges. Any failure or delay in obtaining the approval would restrict your ability to dispose of your Equity Shares. Further, historical trading prices, therefore, may not be indicative of the prices at which the Equity Shares will trade in the future which may adversely impact the ability of our shareholders to sell the Equity Shares or the price at which shareholders may be able to sell their Equity Shares at that point of time.

43. The Issue Price of our Right Equity Shares may not be indicative of the market price of our Equity Shares after the Issue.

The market price of the Equity Shares could be subject to significant fluctuations after the Issue, and may decline below the Issue Price. There can be no assurance that the Investors will be able to sell their Equity Shares at or above the Issue Price. The factors that could affect our share price are:

- (a) quarterly variations in the rate of growth of our financial indicators such as earnings per share;
- (b) changes in revenue or earnings estimates or publication of research reports by analysts;
- (c) speculation in the press or investment community;
- (d) general market conditions; and
- (e) domestic and international economic, legal and regulatory factors unrelated to our performance.

EXTERNAL RISK FACTORS

44. Any downgrading of India's debt rating by a domestic or international rating agency could adversely affect our business.

There could be a downgrade of India's sovereign debt rating due to various factors, including changes in tax or fiscal policy, or a decline in India's foreign exchange reserves, which are outside our control. Any adverse revisions to India's credit ratings for domestic and international debt by domestic or international rating agencies may adversely impact our ability to raise additional financing, and the interest rates and other commercial terms at which such additional financing is available. Although economic conditions are different in each country, investors' reactions to developments in one country can have adverse effects on the securities of companies in other countries, including India, which may cause fluctuations in the prices of our Equity Shares. This could have an adverse effect on our business and financial performance, and ability to obtain financing for expenditures.



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45. Investing in securities that carry emerging market risks can be affected generally by volatility in the emerging markets.

The markets for securities bearing emerging market risks, such as risks relating to India, are, to varying degrees, influenced by economic and securities market conditions in other emerging market countries. Although economic conditions differ in each country, investors' reactions to developments in one country may affect securities of issuers in other countries, including India. A loss of investor confidence in the financial systems of other emerging markets may cause increased volatility in Indian financial markets and the Indian economy in general. Any worldwide financial instability could also have a negative impact on the Indian economy, including the movement of exchange rates and interest rates in India, which could adversely affect the Indian financial sector in particular. Any such disruption could have an adverse effect on our Company's business, future financial performance, financial condition and results of operations, and affect the price of the Equity Shares.

Accordingly, the price and liquidity of the Equity Shares may be subject to significant fluctuations, which may not necessarily be directly or indirectly related to our financial performance.

46. There is no guarantee that the Rights Equity Shares issued pursuant to the Issue will be listed on the Stock Exchange in a timely manner or at all and any trading closures at the Stock Exchange may adversely affect the trading price of our Equity Shares.

In accordance with Indian law and practice, permission for listing of the Rights Equity Shares will not be granted until after those Rights Equity Shares have been issued and allotted. In addition, we are required to deliver this Draft Letter of Offer and Letter of Offer to SEBI and the Stock Exchange under the applicable provisions of the Companies Act and the ICDR Regulations. The trading approval shall be granted subject to the submission of all other relevant documents authorizing the issuing of Rights Equity Shares. There could be a failure or delay in listing the Rights Equity Shares on the Stock Exchange.

Any failure or delay in obtaining the approval would restrict investors' ability to dispose off their Equity Shares. Further, a closure of, or trading stoppage on the Stock Exchange could adversely affect the trading price of the Equity Shares.

47. The Issue Price of our Right Equity Shares may not be indicative of the market price of our Equity Shares after the Issue.

The market price of the Equity Shares could be subject to significant fluctuations after the Issue, and may decline below the Issue Price. There can be no assurance that the Investors will be able to sell their Equity Shares at or above the Issue Price. The factors that could affect our share price are:

- (a) quarterly variations in the rate of growth of our financial indicators such as earnings per share;
- (b) changes in revenue or earnings estimates or publication of research reports by analysts;
- (c) speculation in the press or investment community;
- (d) general market conditions; and
- (e) domestic and international economic, legal and regulatory factors unrelated to our performance.



48. Political instability or changes in the Government or Government policies could impact the liberalization of the Indian economy and adversely affect economic conditions in India generally.

The performance and growth of our Company is dependent on the health of the Indian economy and more generally the global economy. The economy could be adversely affected by various factors such as political or regulatory action, including adverse changes in liberalization policies, social disturbances, terrorist attacks and other acts of violence or war, natural calamities, interest rates, commodity and energy prices and various other factors. The rate of economic liberalization could change, and specific laws and policies affecting foreign investment, currency exchange rates and other matters affecting investment in India could change as well. As a result, our business and the market price and liquidity of the Equity Shares may be affected by such economic and / or political changes. While the current Government is expected to continue the liberalization of India's economic and financial sectors and deregulation policies, there can be no absolute assurance that such policies will be continued. A significant change in India's economic liberalization and deregulation policies could disrupt business and economic conditions in India generally and specifically have an adverse effect on the operations of our Company.

49. Regional hostilities, terrorist attacks, communal disturbances, civil unrest and other acts of violence or war involving India and other countries may result in a loss of investor confidence and adversely affect our business, prospects, results of operations and financial condition.

Terrorist attacks, civil unrest and other acts of violence or war may negatively affect the Indian markets on which our Equity Shares will trade as well as the worldwide financial markets. The Asian region has from time to time experienced instances of civil unrest and hostilities among neighbouring countries which may persist and occur in the future. Military activity or terrorist attacks in India may result in investor concern about stability in the region, which may adversely affect the price of our Equity Shares.

Events of this nature in the future, as well as social and civil unrest within other countries in the World, could influence the Indian economy and could have an adverse effect on the market for securities of Indian companies, including our Equity Shares.

50. Natural disasters and other disruptions could adversely affect the Indian economy and could cause our business and operations to suffer and the trading price of our Equity Shares to decrease.

Our operations, may be damaged or disrupted as a result of natural disasters such as earthquakes, floods, heavy rainfall, epidemics, tsunamis and cyclones and other events such as protests, riots and labour unrest. Such events may lead to the disruption of information systems and telecommunication services for sustained periods. They also may make it difficult or impossible for employees to reach our business locations which may affect our business. Damage or destruction that interrupts our production could adversely affect our reputation, our relationships with our customers, our senior management team's ability to administer and supervise our business or it may cause us to incur substantial additional expenditure to repair or replace damaged equipment or rebuild parts of our infrastructure.

We may also be liable to our customers for disruption in supply resulting from such damage or destruction. Our insurance coverage for such liability may not be sufficient. Any of the above factors may adversely affect our business, our financial results and the price of our Equity Shares.



AKG EXIM LIMITED
(CIN- L00063DL2005PLC139045)

51. Any future issuance of the Equity Shares may dilute your future shareholding and sales of the Equity Shares by the Promoters or other major shareholders of our Company may adversely affect the trading price of the Equity Shares.

Any future equity issuances by our Company may lead to dilution of your future shareholding in our Company. Any future equity issuances by our Company or sales of the Equity Shares by the Promoters or other major shareholders of our Company may adversely affect the trading price of the Equity Share. In addition, any perception by investors that such issuances or sales might occur could also affect the trading price of the Equity Share. Except as otherwise stated in the Draft Letter of Offer, there is no restriction on our Company's ability to issue the Securities or the relevant shareholders' ability to dispose of their Equity Share, and there can be no assurance that our Company will not issue Equity Share or that any such shareholder (including Promoters and Promoter Group) will not dispose of, encumber, or pledge its Securities.

52. The outbreak of Novel Coronavirus, or outbreak of any other severe communicable disease could have a potential impact on our business, financial condition and results of operations.

The outbreak, or threatened outbreak, of any severe epidemic caused due to viruses (particularly the Novel Coronavirus) could materially adversely affect overall business sentiment and environment, particularly if such outbreak is inadequately controlled. The spread of any severe communicable disease may also adversely affect the operations of our customers and suppliers, which could adversely affect our business, financial condition and results of operations. The outbreak of Novel Coronavirus has resulted in authorities implementing several measures such as travel bans and restrictions, quarantines, shelter in place orders, and shutdowns. These measures have impacted and may further impact our workforce and operations, the operations of our customers, and those of our respective vendors and suppliers. There is currently substantial medical uncertainty regarding Novel Coronavirus. A rapid increase in severe cases and deaths where measures taken by governments fail or are lifted prematurely, may cause significant economic disruption in India and in the rest of the world. The scope, duration and frequency of such measures and the adverse effects of Novel Coronavirus remain uncertain and could be severe. Our ability to meet our ongoing disclosure obligations might be adversely affected, despite our best efforts. If any of our employees were suspected of contracting Novel Coronavirus or any other epidemic disease, this could require us to quarantine some or all of these employees or disinfect the facilities used for our operations. In addition, our revenue and profitability could be impacted to the extent that a natural disaster, health epidemic or other outbreak harms the Indian and global economy in general.

The outbreak has significantly increased economic uncertainty. It is likely that the current outbreak or continued spread of Novel Coronavirus will cause an economic slowdown and it is possible that it could cause a global recession. The spread of Novel Coronavirus has caused us to modify our business practices (including employee travel, employee work locations, and cancellation of physical participation in meetings, events and conferences), and we may take further actions as may be required by government authorities or that we determine are in the best interests of our employees, customers, partners, and suppliers. There is no certainty that such measures will be sufficient to mitigate the risks posed by the outbreak, and our ability to perform critical functions could be harmed. The extent to which the Novel Coronavirus further impacts our results will depend on future developments, which are highly uncertain and cannot be predicted, including new information which may emerge concerning the severity of the coronavirus and the actions taken globally to contain the coronavirus or treat its impact, among others. Existing insurance coverage may not provide protection for all costs that may arise from all such possible events.



We are still assessing our business operations and system supports and the impact Novel Coronavirus may have on our results and financial condition, but there can be no assurance that this analysis will enable us to avoid part or all of any impact from the spread of Novel Coronavirus or its consequences, including downturns in business sentiment generally or in our sector in particular. The degree to which Novel Coronavirus impacts our results will depend on future developments, which are highly uncertain and cannot be predicted, including, but not limited to, the duration and spread of the outbreak, its severity, the actions taken to contain the outbreak or treat its impact, and how quickly and to what extent normal economic and operating conditions can resume. The above risks can threaten the safe operation of our facilities and cause disruption of operational activities, environmental harm, loss of life, injuries and impact the wellbeing of our people.

Further in case the lockdown is extended, it could result in muted economic growth or give rise to a recessionary economic scenario, in India and globally, which could adversely affect the business, prospects, results of operations and financial condition of our Company.

53. Inflation in India could have an adverse effect on our profitability and if significant, on our financial condition.

Inflation rates in India have been volatile in recent years, and such volatility may continue in the future. India has experienced high inflation in the recent past. Increased inflation can contribute to an increase in interest rates and increased costs to our business, including increased costs of salaries, and other expenses relevant to our business.

High fluctuations in inflation rates may make it more difficult for us to accurately estimate or control our costs. Any increase in inflation in India can increase our expenses, which we may not be able to pass on to our customers, whether entirely or in part, and the same may adversely affect our business and financial condition. In particular, we might not be able to reduce our costs or increase our rates to pass the increase in costs on to our customers. In such case, our business, results of operations, cash flows and financial condition may be adversely affected.

Further, the GoI has previously initiated economic measures to combat high inflation rates, and it is unclear whether these measures will remain in effect. There can be no assurance that Indian inflation levels will not worsen in the future.



AKG EXIM LIMITED
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SECTION IV- INTRODUCTION

THE ISSUE

The following is a summary of the Issue. This summary should be read in conjunction with, and is qualified in its entirety by, more detailed information in the chapter titled “*Terms of the Issue*” beginning on page 132 of this Draft Letter of Offer:

Authority for the Issue

The Equity Shares in the present Issue are being offered pursuant a resolution passed by our Board at its meeting held on 9th April, 2022 in accordance with the provisions of the Companies Act.

Summary of the Issue

Rights Equity Shares to be Issued	Upto fully paid up [●] Equity Shares
Rights Entitlement for Equity Shares	[●] ([●]) Fully paid up Rights Equity Shares for every [●] ([●]) fully paid-up Equity Share held on the Record Date.
Record Date	[●]
Face value per Equity Share	Rs. 10 each
Issue Price per Rights Equity Share	Rs. [●] per Rights Equity Share
Issue Size	Upto Rs. 2800.00 Lakhs
Equity Shares outstanding prior to the Issue	1,05,92,192 fully paid up Equity Shares
Equity Shares outstanding after the Issue (assuming full subscription for and Allotment of the Rights Entitlement)	[●] fully paid up Equity Shares
ISIN and Symbol	ISIN: INE00Y801016, NSE: AKG
Terms of the Issue	For more information, please see the chapter titled “ <i>Terms of the Issue</i> ” beginning on page 132 of this Draft Letter of Offer.
Use of Issue Proceeds	For more information, please see the chapter titled “ <i>Objects of the Issue</i> ” beginning on page 62 of this Draft Letter of Offer.
Terms of Payment	The full amount of Issue Price Rs. [●] per Rights Equity Share is payable on Application.

For details in relation fractional entitlements, see “Terms of the Issue - Fractional Entitlements” beginning on page 151 of this Draft Letter of Offer.

Terms of payment

Due Date	Amount payable per Equity Shares
On the Issue application (i.e. along with the Application Form)	Rs. [●]



SUMMARY OF FINANCIAL STATEMENTS

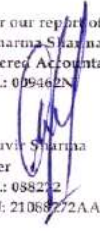


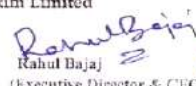

The summary financial information of our Company as derived from the Audited Standalone and consolidated Financial Statements of our Company for the financial year ended on March 31, 2021 and Unaudited Standalone and consolidated financial statements for the Nine months ended on December 31, 2021 is reproduced below. Our summary financial information should be read in conjunction with the financial statements and the notes (including the significant accounting principles) thereto included in chapter titled “*Financial Statements*” beginning on page 101 of this Draft Letter of Offer.

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AKG EXIM LIMITED
(CIN- L00063DL2005PLC139045)

AUDITED STANDALONE PROFIT AND LOSS FOR THE PERIOD ENDING 31ST MARCH, 2021

AKG EXIM LIMITED CIN: L00063DL2005PLC139045 Standalone Statement of Profit and Loss for the year ended 31 March, 2021			
(Rs. In Lakhs)			
Particulars	Notes	Year Ended 31st March-2021	Year Ended 31st March-2020
INCOME			
Revenue from operations	22	7,751.67	6,637.65
Other income	23	19.72	322.78
Total Income (I)		7,771.39	6,960.43
EXPENSES			
Cost of Materials Consumed		-	-
Purchases of Stock in Trade	24	7,245.26	5,192.14
Changes in inventories of finished good & work-in-progress	25	(9.31)	784.86
Employee benefits expenses	26	56.15	93.33
Finance costs	27	89.30	131.38
Depreciation and amortization expens	2	17.46	57.60
Other expenses	28	227.44	549.70
Total expenses (II)		7,625.29	6,809.00
Profit/(loss) before tax (III) = (I-II)		145.09	151.43
Tax expense			
(1) Current tax	30		
Current Year		37.72	36.10
Earlier years		-	-
(2) Deferred tax		0.42	6.78
(3) Mat Credit Entitlement		-	-
Total Tax Expenses (IV)		38.14	42.88
Profit After Tax (V) = (III)-(IV)		106.95	108.55
Other Comprehensive Income			
Items that will not be reclassified to profit & loss			
a) Remeasurement of defined benefit obligations		-	-
Income tax relating to these items		-	-
b) Change in fair value of investment in equities carried at fair value through OCI		-	-
Income tax relating to these items		-	-
Other Comprehensive Income for the year, net of tax (VI)		-	-
Total Comprehensive Income for the year (VII) = (V+VI)		106.95	108.55
Earnings per share			
Weighted average number of Ordinary Shares outstanding during the year		1,05,92,192	66,20,120
Basic		1.01	1.64
Diluted		1.01	1.64
Statement of significant accounting policies			
1			
The accompanying notes are integral part of the financial statements.			
As per our report of even date			
For Sharma Sharma & Co.			
Chartered Accountants			
F.R.N.: 009462N			
 CA Suvir Sharma Partner M.No.: 088222 UDIN: 2106872AAAADW7694			
			
Date: 29-06-2021			
Place: Gurugram			
For AKG EXIM LIMITED  Managing Director Mahima Goel (Managing Director) DIN: 0220500		For and on behalf of AKG EXIM LIMITED AKG Exim Limited  Rahul Bajaj (Executive Director & CFO) DIN: 03468766 C.F.O.	
For AKG EXIM LIMITED  Pragati Parnian Company Secretary Membership No. A58202			

AUDITED STANDALONE BALANCE SHEET AS ON 31ST MARCH, 2021

AKG EXIM LIMITED CIN: L00063DL2005PLC139045 Standalone Balance Sheet as at 31 March, 2021				
Particulars	Notes	As at 31st March 2021	As at 31st March 2020	As at 1st April 2019
Assets				
Non-current Assets				
Property, plant and equipment	2	69.48	87.08	860.49
Other Intangible Assets		-	-	-
Financial Assets				
Investments	3	52.55	-	-
Other Financial Assets	4	4.61	3.71	15.82
Other Non-Current Assets	5	15.15	22.92	38.07
Total Non Current Assets		141.79	113.71	914.38
Current Assets				
Inventories	6	313.95	304.64	1,089.50
Financial Assets				
Investments		-	-	-
Trade receivables	7	2,309.99	1,720.07	3,110.99
Loans	8	58.85	-	-
Cash and cash equivalent	9	1.85	336.82	279.16
Other Bank Balances		-	-	-
Other Financial Assets	10	88.67	17.68	34.23
Current Tax Assets (Net)		-	-	-
Other Current Assets	11	533.68	648.48	536.53
Total Current Assets		3,306.99	3,027.69	5,050.41
Total Assets		3,448.78	3,141.39	5,964.78
Equity and Liabilities				
Equity				
Equity Share Capital	12	1,059.22	662.01	662.01
Other Equity	13	1,016.81	1,307.07	1,198.52
Total Equity		2,076.03	1,969.08	1,860.53
Non-current Liabilities				
Financial Liabilities				
a) Borrowings	14	33.57	43.81	69.82
Deferred Tax Liabilities (net)	15	29.64	29.22	22.44
Other-Non-current Liabilities		-	-	-
Total Non Current Liabilities		63.21	73.03	92.27
Current Liabilities				
Financial Liabilities				
Borrowings	16	921.48	951.79	2,864.94
Trade payables-	17	-	-	-
Total Outstanding dues of micro enterprises and small enterprises		-	-	-
Total Outstanding dues of creditors other than micro enterprises and small enterprises		288.58	93.19	570.31
Other-Financial Liabilities	18	48.80	16.08	2.53
Other Current Liabilities	19	1.58	0.65	529.06
Provisions	20	11.28	1.47	14.43
Current Tax Liabilities (net)	21	37.72	36.10	30.72
Total Current Liabilities		1,309.55	1,099.28	4,011.99
Total Equity and Liabilities		3,448.78	3,141.39	5,964.78
Statement of significant accounting policies				
The accompanying notes are integral part of the financial statements. 1				
<p>As per our report of even date For Sharma Sharma & Co. Chartered Accountants F.R.N.: 009462N</p> <p>CA Suvir Sharma Partner M.No.: 085272 UDIN: 21088272AAAADW7694</p> <p>Date: 29-06-2021 Place : Gurugram</p> <p style="text-align: center;">For AKG EXIM LIMITED Managing Director Mahima Goel (Managing Director) DIN: 02205003</p> <p style="text-align: center;">For AKG EXIM LIMITED For and on behalf of the Board of Directors AKG Exim Limited Rahul Bojaj (Executive Director & CFO) DIN: 03408766 C.F.O.</p> <p style="text-align: center;">For AKG EXIM LIMITED Pragati Parmika Company Secretary Membership No. AS8202</p>				



• Import • Export

AKG EXIM LIMITED
(CIN- L00063DL2005PLC139045)

AUDITED STANDALONE CASH FLOW STATEMENT FOR THE PERIOD ENDING 31ST MARCH, 2021




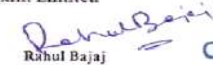
AKG EXIM LIMITED CIN: L00063DL2005PLC139045 Standalone Statement Of Cashflow for the year ended 31 March, 2021		
Particulars	(Rs. In Lakhs)	
	As at 31st March, 2021	As at 31st March 2020
A. CASH FLOW FROM OPERATING ACTIVITY		
Net Profit Before Tax as per Statement of Profit and Loss	145.09	151.43
Adjustments to reconcile profit before tax to net cash flows:		
Depreciation and impairment of property, plant and equipment	17.46	57.60
Preliminary Expenses W/o	7.77	7.77
Net Gain/Loss on disposal of property, plant and equipment	-	(274.09)
Interest income	(1.79)	(32.43)
Finance costs	89.30	131.38
PPE written off	0.16	4.06
Provision for doubtful debts, advances, deposits and others	-	-
Cash generated from operations before working capital changes	257.98	45.71
Working capital adjustments:		
Increase/decrease in trade receivables	(589.91)	1,390.92
Increase/decrease in non current financial assets	(0.90)	12.10
Increase/decrease in loan	(58.85)	-
Increase/decrease in non current assets	-	7.38
Increase/decrease in Investment	(52.55)	-
Increase/decrease in other current financial assets	(70.99)	16.55
Increase/decrease in other current assets	114.79	(111.94)
Increase/decrease in inventory	(9.31)	784.86
Increase/decrease in other current financial liabilities	32.72	15.55
Increase/ decrease in other current liabilities	0.93	(528.41)
Increase/decrease in trade payables	195.49	(477.12)
Increase/decrease in non current liabilities	-	-
Increase/decrease in current provisions	9.80	(12.96)
Cash generated from operation	(170.79)	1,140.65
Income tax paid	(36.10)	(30.72)
Net cash flows from operating activities (A)	(206.89)	1,109.93
B. CASH FLOW FROM INVESTING ACTIVITY		
Proceeds from sale of property, plant and equipment	-	1,005.84
Purchase of property, plant and equipment	(0.02)	(21.00)
Purchase of non current investment	-	-
Purchase/Sale of current investment	-	-
Interest received	1.79	32.43
Net cash flows used in investing activities (B)	1.77	1,018.27
C. CASH FLOW FROM FINANCING ACTIVITY		
Proceeds from issue of Share Capital	397.21	-
Share premium	(397.21)	-
Proceeds from / (Repayment of) Short Term Borrowings/long term borrowing	(40.55)	(1,939.17)
Interest Paid	(89.30)	(131.38)
Net cash flows from/(used in) financing activities (C)	(129.85)	(2,070.54)
Net increase in cash and cash equivalents(A+B+C)	(334.97)	57.66
Cash and cash equivalents at the beginning of the year	336.82	279.16
Cash and cash equivalents at year end	1.85	336.82
Notes:		
(i) The above Statement of Cash Flows has been prepared under the 'Indirect Method' as set out in Ind AS 7, 'Statement of Cash Flows'.		
(ii) Previous year figures have been regrouped / rearranged to make them comparable, wherever considered necessary, with those of the current year.		
<p>As per our report of even date For Sharma Sharma & Co. Chartered Accountants F.R.N.: 00946824</p> <p>CA Suvir Sharma Partner M.No.: 088272 Place : Gurugram Date: 29-06-2021</p>	<p>For AKG EXIM LIMITED</p> <p>For and on behalf of the Board of Directors</p> <p><i>Manima Coe</i> Managing Director (Managing Director) DIN: 02205643</p> <p><i>Pingati Parnika</i> Company Secretary Membership No. A58202</p>	<p>For AKG EXIM LIMITED</p> <p><i>Rahul Bajaj</i> C.F.O. Rahul Bajaj (Executive Director & CFO) DIN: 03408766</p>



• Import • Export

AKG EXIM LIMITED
(CIN- L00063DL2005PLC139045)

AUDITED CONSOLIDATED PROFIT AND LOSS FOR THE PERIOD ENDING 31ST MARCH, 2021

AKG EXIM LIMITED CIN: L00063DL2005PLC139045 Consolidated Statement of Profit and Loss for the year ended 31 March, 2021			
Particulars	Notes	Year Ended 31st March-2021	Year Ended 31st March-2020
INCOME			
Revenue from operations	22	10,438.18	6,637.65
Other income	23	19.72	322.78
Total Income (I)		10,457.90	6,960.43
EXPENSES			
Cost of Materials Consumed		-	-
Purchases of Stock in Trade		-	-
Changes in inventories of finished good & work-in-progress	24	9,808.93	5,192.14
Employee benefits expenses	25	(13.20)	784.86
Finance costs	26	58.08	93.33
Depreciation and amortization expens	27	89.30	131.38
Other expenses	2	17.46	57.60
	28	320.36	549.70
Total expenses (II)		10,280.94	6,809.00
Profit/(loss) before tax (III) = (I-II)		176.96	151.43
Tax expense			
(1) Current tax	30		
Current Year		37.72	36.10
Earlier years		-	-
(2) Deferred tax		0.42	6.78
(3) Mat Credit Entitlement		-	-
Total Tax Expenses (IV)		38.14	42.88
Profit After Tax (V) = (III)-(IV)		138.82	108.55
Other Comprehensive Income			
Items that will not be reclassified to profit & loss			
a) Remeasurement of defined benefit obligations		-	-
Income tax relating to these items		-	-
Items that will be reclassified to profit & loss			
Exchange differences on translating the financial statements of foreign subsidiary		(0.11)	-
Income tax relating to these items		-	-
		(0.11)	-
Other Comprehensive Income for the year, net of tax (VI)		(0.11)	-
Total Comprehensive Income for the year (VII) = (V+VI)		138.71	108.55
Profit attributable to:			
Owners of the Company		141.06	-
Non-controlling interests		(2.35)	-
Earnings per share			
Weighted average number of Ordinary Shares outstanding during the year			
Basic		1,05,92,192	66,20,120
Diluted		1.01	1.64
		1.01	1.64
Statement of significant accounting policies			
The accompanying notes are integral part of the financial statements.			
As per our report of even date			
For Sharma, Sharma & Co.			
Chartered Accountants			
F.R.N.: 009667N			
			
CA Suresh Sharma Partner M.No.: 048272 UDIN: 21088272AAAADW7634			
Date: 29-06-2021			
Place: Gurugram			
For AKG EXIM LIMITED and on behalf of the Board of Directors AKG Exim Limited			
 Managing Director Mahima Goel (Managing Director) DIN: 02205003			
 Pragati Parnika Company Secretary Membership No. A58202			
 Rahul Bajaj (Executive Director & CFO) DIN: 03408766 C.F.O.			



• Import • Export

AKG EXIM LIMITED
(CIN- L00063DL2005PLC139045)

AUDITED CONSOLIDATED BALANCE SHEET AS ON 31ST MARCH, 2021

AKG EXIM LIMITED CIN: L00063DL2005PLC139045 Consolidated Balance Sheet as at 31 March, 2021				
Particulars	Notes	As at 31st March 2021	As at 31st March 2020	As at 1st April 2019
Assets				
Non-current Assets				
Property, plant and equipment	2	78.99	87.08	860.49
Capital work in progress		108.47	-	-
Financial Assets				
Investments	3	-	-	-
Loans	4	-	-	-
Other Financial Assets	4	4.61	3.71	15.82
Other Non-Current Assets	5	15.15	22.92	38.07
Total Non Current Assets		207.21	113.71	914.38
Current Assets				
Inventories	6	317.83	304.64	1,089.50
Financial Assets				
Investments		-	-	-
Trade receivables	7	2,340.36	1,720.07	3,110.99
Loans	8	0.00	-	-
Cash and cash equivalent	9	9.67	336.82	279.16
Other Bank Balances		-	-	-
Other Financial Assets	10	88.67	17.68	34.23
Current Tax Assets (Net)		-	-	-
Other Current Assets	11	595.98	648.48	536.53
Total Current Assets		3,352.53	3,027.69	5,050.41
Total Assets		3,559.74	3,141.39	5,964.78
Equity and Liabilities				
Equity				
Equity Share Capital	12	1,059.22	662.01	662.01
Other Equity	13	1,050.81	1,307.07	1,198.52
Non-controlling interests		12.35	-	-
Total Equity		2,122.37	1,969.08	1,860.53
Non-current Liabilities				
Financial Liabilities				
a) Borrowings	14	33.57	43.81	69.82
Deferred Tax Liabilities (net)	15	29.64	29.22	22.44
Other-Non-current Liabilities		-	-	-
Total Non Current Liabilities		63.21	73.03	92.27
Current Liabilities				
Financial Liabilities				
Borrowings	16	971.79	951.79	2,864.94
Trade payables-	17	-	-	-
Total Outstanding dues of micro enterprises and small enterprises		-	-	-
Total Outstanding dues of creditors other than micro enterprises and small enterprises		302.99	93.19	570.51
Other-Financial Liabilities	18	48.80	16.08	2.53
Other Current Liabilities	19	1.58	0.65	529.06
Provisions	20	11.28	1.47	14.43
Current Tax Liabilities (net)	21	37.72	36.10	30.72
Total Current Liabilities		1,374.16	1,099.28	4,011.99
Total Equity and Liabilities		3,559.74	3,141.39	5,964.78
Statement of significant accounting policies				
The accompanying notes are integral part of the financial statements.				
1				
As per our report of even date For Sharma, Sharma & Co. Chartered Accountants F.R.N.: 009/62N CA Sushil Sharma Partner M.No.: 088272 UDIN: 21089272AAAADW7694 Date: 29-06-2021 Place : Gurugram		For AKG EXIM LIMITED For and on behalf of the Board of Directors AKG Exim Limited Managing Director Mahima Ojha (Managing Director) DIN: 02205003		
		 C.F.O. Rahul Bajaj (Executive Director & C.F.O) DIN: 03408766 For AKG EXIM LIMITED Pragati Parijka Company Secretary Membership No. A58202		



• Import • Export

AKG EXIM LIMITED
(CIN- L00063DL2005PLC139045)

AUDITED CONSOLIDATED CASH FLOW STATEMENT FOR THE PERIOD ENDING 31ST MARCH, 2021

AKG EXIM LIMITED CIN: L00063DL2005PLC139045 Consolidated Statement Of Cashflow for the year ended 31 March, 2021		
Particulars	(Amount in Rupees)	
	As at 31st March, 2021	As at 31st March 2020
A. CASH FLOW FROM OPERATING ACTIVITY		
Net Profit Before Tax as per Statement of Profit and Loss	176.96	151.43
Adjustments to reconcile profit before tax to net cash flows:		
Depreciation and impairment of property, plant and equipment	17.46	57.60
Preliminary Expenses W/o	7.77	7.77
Net Gain/Loss on disposal of property, plant and equipment	-	(274.09)
Interest income	(1.79)	(32.43)
Finance costs	89.30	131.38
PPE written off	0.16	4.06
Provision for doubtful debts, advances, deposits and others	-	-
Cash generated from operations before working capital changes	289.85	45.71
Working capital adjustments:		
Increase/ decrease in trade receivables	(620.29)	1,390.92
Increase/ decrease in non current financial assets	(0.90)	12.10
Increase/ decrease in loan	(0.00)	-
Increase/ decrease in non current assets	-	7.38
Increase/ decrease in Investment	-	-
Increase/ decrease in other current financial assets	(70.99)	16.55
Increase/ decrease in other current assets	52.49	(111.94)
Increase/ decrease in inventory	(13.20)	784.86
Increase/ decrease in other current financial liabilities	32.72	13.55
Increase/ decrease in other current liabilities	0.71	(528.41)
Increase/ decrease in trade payables	209.80	(477.12)
Increase/ decrease in non current liabilities	-	-
Increase/ decrease in current provisions	9.80	(12.96)
Cash generated from operation	(110.00)	1,140.65
Income tax paid	(36.10)	(30.72)
Net cash flows from operating activities (A)	(146.10)	1,109.93
B. CASH FLOW FROM INVESTING ACTIVITY		
Proceeds from sale of property, plant and equipment	-	1,006.84
Purchase of property, plant and equipment including CWIP	(117.99)	(21.00)
Purchase of non current investment	-	-
Purchase/Sale of current investment	-	-
Interest received	1.79	32.43
Net cash flows used in investing activities (B)	(116.20)	1,018.27
C. CASH FLOW FROM FINANCING ACTIVITY		
Proceeds from Issue of Share Capital	397.21	-
Share premium	(397.21)	-
Proceeds from subsidiary Interests to the non controlling Interest	14.70	-
Proceeds from / (Repayment of) Short Term Borrowings/long term borrowing	9.75	(1,939.17)
Interest Paid	(89.30)	(131.38)
Net cash flows from/(used in) financing activities (C)	(64.85)	(2,070.54)
Net increase in cash and cash equivalents(A+B+C)	(327.15)	57.66
Cash and cash equivalents at the beginning of the year	336.82	279.16
Cash and cash equivalents at year end	9.67	336.82
Notes:		
(i) The above Statement of Cash Flows has been prepared under the 'Indirect Method' as set out in Ind AS 7, 'Statement of Cash Flows'.		
(ii) Previous year figures have been regrouped / rearranged to make them comparable, wherever considered necessary, with those of the current year.		
<p>As per our report of even date For Sharma Sharma & Co. Chartered Accountants F.R.N.: 009462N</p> <p>CA Suvjit Sharma Partner M.No.: 088272 Place: Gurugram Date: 29-06-2021</p>	<p>For AKG EXIM LIMITED</p> <p>For and on behalf of the Board of Directors</p> <p><i>Mahima Goyal</i> Managing Director DIN: 02205003</p> <p><i>Prajati Parthiv</i> Company Secretary Membership No. A 58202</p>	<p>For AKG EXIM LIMITED</p> <p>For and on behalf of the Board of Directors</p> <p><i>Rahul Bajaj</i> Rahul Bajaj (Executive Director & CFO) DIN: 03408766</p> <p>C.F.O.</p>


UNAUDITED STANDALONE FINANCIAL RESULTS FOR THE NINE MONTHS ENDED 31ST DECEMBER, 2021

Statement of Unaudited Standalone Financial Results for the quarter and nine months ended 31st December, 2021

(Rs in Lakhs except as stated)

S No.	Particulars	STANDALONE					
		Quarter Ended			Nine Months Ended		Year Ended
		December 31, 2021 (Unaudited) 3 Months	September 30, 2021 (Unaudited) 3 Months	December 31, 2020 (Unaudited) 3 Months	December 31, 2021 (Unaudited) 9 Months	December 31, 2020 (Unaudited) 9 Months	March 31, 2021 (Audited) 12 Months
1	Income						
	a) Revenue from operations	3,521.12	2,299.10	2,270.33	7,332.79	5,172.16	7,867.77
	b) Other operating income	-	-	-	-	-	-
	Total revenue from operations	3,521.12	2,299.10	2,270.33	7,332.79	5,172.16	7,867.77
2	Other income	-	0.05	1.13	26.79	19.70	19.72
3	Total income (1+2)	3,521.12	2,299.15	2,271.46	7,359.58	5,191.86	7,887.49
4	Expenses						
	a) Cost of materials consumed	-	-	-	-	-	-
	b) Purchases of stock-in-trade	3,366.58	2,369.71	2,247.96	7,055.45	4,730.79	7,245.26
	c) Change in inventories of finished goods and work-in-progress & Stock In Trade	-157.50	-272.50	-155.24	-383.12	52.65	-9.31
	d) Employee benefits expense	23.03	18.66	19.19	59.62	56.53	56.15
	e) Finance costs	18.44	24.37	21.80	63.62	60.06	89.30
	f) Depreciation and amortisation expense	3.62	3.62	0.59	10.20	16.90	17.46
	g) Other expenses:						
	- Power & Fuel	0.98	1.64	3.50	4.07	8.06	-
	- Other expenses	219.79	110.70	92.29	441.36	193.29	343.54
	Total Expenses	3,474.94	2,256.21	2,230.09	7,251.20	5,118.28	7,742.40
5	Profit/(Loss) before exceptional items and tax (3-4)	46.18	42.94	41.37	108.38	73.58	145.09
6	Exceptional items	-	-	-	-	-	-
7	Profit/(Loss) before tax (5 + 6)	46.18	42.94	41.37	108.38	73.58	145.09
8	Tax expense						
	- Current tax	12.01	11.16	10.76	28.18	19.13	37.72
	- Taxes in respect of earlier years	-	-	-	-	-	-
	- Mat Credit Entitlement	-	-	-	-	-	-
	- Deferred Tax Charge/ (Credit)	-0.03	-0.03	-1.30	-0.25	0.87	0.45
9	Net Profit/(Loss) for the period (7 - 8)	34.20	31.80	31.91	80.45	53.57	106.92
10	Other Comprehensive Income (OCI)						
	i) a) items that will not be reclassified to profit or loss	-	-	-	-	-	-
	b) income tax relating to items that will not be reclassified to profit or loss	-	-	-	-	-	-
	ii) a) items that will be reclassified to profit or loss	-	-	-	-	-	-
	b) income tax relating to items that will be reclassified to profit or loss	-	-	-	-	-	-
11	Total Comprehensive Income for the period (9 + 10)	34.20	31.80	31.91	80.45	53.57	106.92
12	Paid-up Equity share capital (Face value per share Rs 10 each)	1,059.22	1,059.22	1,059.22	1,059.22	1,059.22	1,059.22
13	Other equity	-	-	-	-	-	-
14	Earnings per share of Rs 10 each						
	(a) Basic (Rs)	0.32	0.30	0.30	0.76	0.51	1.01
	(b) Diluted (Rs)	0.32	0.30	0.30	0.76	0.51	1.01

- The above standalone and consolidated financial results have been prepared in accordance with the Indian Accounting Standards ("Ind AS") as prescribed under Section 133 of the Companies Act, 2013 read with relevant rules issued thereunder.
- The above standalone and consolidated financial results have been reviewed by the Audit Committee and approved by the Board of Directors in their respective meetings held on February 03, 2022 and have been reviewed by the Statutory Auditors of the Company.
- The Company's/ Group's operations and revenue were impacted on account of disruption in economic activity due to CoVID 19. The management believes that the overall impact of the pandemic is short term and temporary in nature and is not likely to have any significant impact on the recoverability of the carrying value of its assets and the future operations. The management is closely monitoring the developments and possible effects that may result from the pandemic on its financial condition, liquidity and operations and is actively working to minimize the impact of this unprecedented situation.
- The figures of the previous period/year have been regrouped/reclassified, wherever necessary, to conform to current period's/year's classification.

 By the Order of the Board
For AKG EXIM LIMITED
 For AKG Exim Limited

 Mahima Goel
 Managing Director
 DIN: 02205003

For AKG EXIM LIMITED

 Rahul Bajaj
 Executive Director & CFO
 DIN: 03408766
 C.F.O.

 Place: Gurugram
 Date: 03-02-2022



UNAUDITED CONSOLIDATED FINANCIAL RESULTS FOR THE NINE MONTHS ENDED 31ST DECEMBER, 2021

Statement of Unaudited Consolidated Financial Results for the quarter and nine months ended 31st December, 2021

(Rs in Lakhs except as stated)

S. No.	Particulars	CONSOLIDATED					
		Quarter Ended			Nine Months Ended		Year Ended
		December 31, 2021 (Unaudited) 3 Months	September 30, 2021 (Unaudited) 3 Months	December 31, 2020 (Unaudited) 3 Months	December 31, 2021 (Unaudited) 9 Months	December 31, 2020 (Unaudited) 9 Months	March 31, 2021 (Audited) 12 Months
1	Income						
	a) Revenue from operations	5,418.68	3,519.72	3,243.92	11,240.21	7,076.68	10,649.32
	b) Other operating income	-	-	-	-	-	-
	Total revenue from operations	5,418.68	3,519.72	3,243.92	11,240.21	7,076.68	10,649.32
2	Other income (Refer Note No 4)	-	5.73	3.65	47.25	19.70	19.72
3	Total income (1+2)	5,418.68	3,525.45	3,247.57	11,287.46	7,096.39	10,669.04
4	Expenses						
	a) Cost of materials consumed	-	-	-	-	-	-
	b) Purchases of stock-in-trade	5,170.00	3,497.10	3,125.15	10,731.38	6,492.05	9,837.65
	c) Change in inventories of finished goods & work-in-progress	-157.50	-272.50	-155.24	-380.80	52.65	-13.20
	d) Excise duty on sales	-	-	-	-	-	-
	e) Employee benefits expense	26.40	23.27	22.62	72.47	62.75	87.71
	f) Finance costs	18.44	24.37	30.55	63.62	68.81	92.64
	g) Depreciation and amortisation expense	3.62	3.62	0.59	10.20	16.90	17.46
	h) Other expenses	-	-	-	-	-	-
	- Power & Fuel	0.98	4.83	3.50	5.81	8.06	10.28
	- Other expenses	293.58	182.03	137.87	629.36	291.72	458.88
	Total Expenses	5,355.52	3,462.73	3,165.05	11,132.04	6,992.93	10,491.42
5	Profit/(Loss) before exceptional items and tax (3-4)	63.16	62.72	82.52	155.42	103.46	177.63
6	Exceptional items	-	-	-	-	-	-
7	Profit/(Loss) before tax (5 + 6)	63.16	62.72	82.52	155.42	103.46	177.63
8	Tax expense:						
	- Current tax	16.42	16.31	21.46	40.41	26.90	46.18
	- Deferred tax charge/(credit)	-0.03	-0.03	-1.30	-0.25	0.87	0.45
		-	-	-	-	-	-
9	Net Profit/(Loss) for the period/year (7 - 8)	46.76	46.44	62.36	115.26	75.69	130.99
10	Other Comprehensive Income (OCI)						
	i) a) items that will not be reclassified to profit or loss	-	-	-	-	-	-
	b) Income tax relating to items that will not be reclassified to profit or loss	-	-	-	-	-	-
	ii) a) items that will be reclassified to profit or loss	-	-	-	-	-	-
	b) Income tax relating to items that will be reclassified to profit or loss	-	-	-	-	-	-
11	Total Comprehensive Income for the period/year (9 + 10)	46.76	46.44	62.36	115.26	75.69	130.99
	Profit attributable to:						
	Owners of the Company						
	Non-controlling interests						
	Other Comprehensive income attributable to:						
	Owners of the Company						
	Non-controlling interests						
	Total Comprehensive income attributable to:						
	Owners of the Company						
	Non-controlling interests						
12	Paid-up Equity share capital (Face value of Rs 10 each)	1,059.22	1,059.22	1,059.22	1,059.22	1,059.22	1,059.22
13	Other Equity	-	-	-	-	-	-
14	Earnings per share of Rs 10 each - Not annualised (in Rs.)						
	(a) Basic (Rs)	0.44	0.44	0.59	1.09	0.71	1.24
	(b) Diluted (Rs)	0.44	0.44	0.59	1.09	0.71	1.24

By the Order of the Board
For AKG Exim Limited

For AKG EXIM LIMITED

Mahima Goel
Managing Director

Managing Director

For AKG EXIM LIMITED

Rahul Bajaj
Executive Director & CFO
DIN: 03408766

C.F.O.

Place : Gurugram
Date : 03-02-2022



AKG EXIM LIMITED
(CIN- L00063DL2005PLC139045)

GENERAL INFORMATION

Our Company was originally incorporated at New Delhi as “Akg Exim Private Limited” on 26th July, 2005 under the provisions of the Companies Act, 1956 vide Certificate of Incorporation issued by the Asst. Registrar of Companies, NCT of Delhi & Haryana. Consequent upon the conversion of our Company to public limited company, the name of our Company was changed to “Akg Exim Limited” vide fresh certificate of incorporation dated 17th January, 2018 issued by the Registrar of Companies, Delhi.

OFFICE(S) OF OUR COMPANY

REGISTERED OFFICE

AKG Exim Limited
7th Floor, H.B. Twin Tower,
Netaji Subhash Place,
Pitampura, Delhi-110034

CORPORATE OFFICE

AKG Exim Limited
Unit No. 237, 2nd Floor, Tower-B, Spazedge,
Sector 47, Sohna Road,
Gurugram-122018

CIN: L00063DL2005PLC139045

Email: info@akg-global.com

Website: www.akg-global.com

Tel: 0124-4267873

ADDRESS OF REGISTRAR OF COMPANIES

Registrar of Companies, Delhi,
Address:
4th Floor, IFCI Tower, 61, Nehru Place,
New Delhi - 110019

CHANGES IN REGISTERED OFFICE

Upon incorporation, the Registered Office of our Company was 141PK. A-2, Sec-5, Rohini, New Delhi-110085. Thereafter, our Company has shifted the Registered Office, the details of which are set out below:

Date of Change of Registered Office	Old Address	New Address	Reason for Change
14.12.2009	141PK. A-2, Sec-5, Rohini, New Delhi-110085	Plot No 7, 3rd. Floor, Sector - 5, Rohini, DDA Service Center, Delhi-110085	Administrative purpose



AKG EXIM LIMITED
(CIN- L00063DL2005PLC139045)

Date of Change of Registered Office	Old Address	New Address	Reason for Change
01.02.2011	Plot No 7, 3rd. Floor, Sector - 5, Rohini, DDA Service Center, Delhi-110085	408-411 Pearls Corporate, Mangalam Place, Sector - 3, Rohini, Behind Kali Mata Temple, Delhi-110085	Administrative purpose
10.07.2021	408-411 Pearls Corporate, Mangalam Place, Sector - 3, Rohini, Behind Kali Mata Temple, Delhi-110085	7 th Floor, H.B. Twin Tower, Netaji Subhash Place, Pitampura, Delhi-110034	Administrative purpose

BOARD OF DIRECTORS OF OUR COMPANY

NAME	DESIGNATION	DIN	PAN	ADDRESS
Mr. Rajeev Goel	Non Executive Director	01507297	AAJPG4108N	C-50, Suncity, Golf Course Road, Sector-54, Gurgaon, Sikanderpur Ghosi(68), DLF QE Gurgaon 122002
Mrs. Mahima Goel	Managing Director	02205003	ABZPG8712D	C-50, Suncity, Golf Course Road, Sector-54, Gurgaon, Sikanderpur Ghosi(68), DLF QE Gurgaon 122002
Mr. Rahul Bajaj	Executive and Non Independent Director	03408766	AOUPB5442B	C-12/126, 1st Floor, sector-5, Rohini, New Delhi-110085
Mr. Rao Laxman Singh	Non-Executive and Independent Director	08055192	AAJPY3453A	House No. 1029, Sector-17B, Industrial Estate, Gurgaon Haryana India 122007
Mr. Rakesh Mohan	Non-Executive and Independent Director	07352915	AAAPM1773G	K-6C, SFC Flats, Saket New Delhi- 110017
Mrs. Chetna	Non-Executive and Independent Director	08981045	AVEPC8499A	House no. 138, Rithala, North West Delhi- 110085

For more details, please see the section titled “Our Management” on page 93 of this Draft Letter of Offer.

**COMPANY SECRETARY & COMPLIANCE OFFICER:****Ms. Mahak**Unit No. 237, 2nd Floor,
Tower-B, Spazedge,
Sector 47, Sohna Road,
Gurugram-122018Email: info@akg-global.comWebsite: www.akg-global.com

Tel: 0124-4267873

Investors may contact the Registrar to the Issue or our Company Secretary and Compliance Officer for any pre-Issue or post-Issue related matters. All grievances relating to the ASBA process may be addressed to the Registrar to the Issue, with a copy to the SCSB (in case of ASBA process), giving full details such as name, address of the Applicant, contact number(s), e-mail address of the sole/ first holder, folio number or demat account, number of Equity Shares applied for, amount blocked (in case of ASBA process), ASBA Account number and the Designated Branch of the SCSB where the Application Forms, or the plain paper application, as the case may be, was submitted by the Investors along with a photocopy of the acknowledgement slip (in case of ASBA process). For details on the ASBA process, see "Terms of the Issue" beginning on page 132 of this Draft Letter of Offer.

CHIEF FINANCIAL OFFICER:**Mr. Rahul Bajaj**Unit No. 237, 2nd Floor,
Tower-B, Spazedge,
Sector 47, Sohna Road,
Gurugram-122018Email: cfo@akg-global.comWebsite: www.akg-global.com

Tel: 0124-4267873

ADVISOR TO THE ISSUE:**Navigant Corporate Advisors Limited**423, A Wing, Bonanza,
Sahar Plaza Complex,
J B Nagar, Andheri Kurla Road,
Andheri East,
Mumbai-400 059

Tel.No. +91-22-41204837/49735078

Email Id- navigant@navigantcorp.comInvestor Grievance Email: info@navigantcorp.comWebsite: www.navigantcorp.com

SEBI Registration Number: INM000012243

Contact Person: Mr. Sarthak Vijlani

**CONSULTANT TO THE COMPANY:****SNI CAPITAL ADVISORS**

4805/24, Bharat Ram Road,
Darya Ganj,
New Delhi-110002

Tel: +91-11-43528764

Fax: +91-11-23288003

E-mail: info@snicapitaladvisors.com

Website: www.snicapitaladvisors.com

Contact Person: Mr. Vivek Jain

REGISTRAR TO THE ISSUE**MAS SERVICES LIMITED**

T-34, 2nd Floor,
Okhla Industrial Area Phase - II,
New Delhi - 110020

Tel No.: +91-11-26387281/82/83

Fax No.: +91-11-26387384

Website: www.masserv.com

E-mail ID: info@masserv.com

Contact Person: Mr. Sharwan Mangla

SEBI Registration No: INR000000049

LEGAL ADVISORS TO THE ISSUE:**M/s. RMA LEGAL**

39, Mittal Chambers
Nariman Point, Mumbai

Tel No : +91-22-43470063

Website: www.rmalegal.net

Contact person: Ms. Meenakshi Acharya, Partner

STATUTORY AUDITORS:**M/s. Dharam Taneja Associates**

Chartered Accountants
13/17, Punjabi Bagh Extn.,
New Delhi - 110034

Email: dtadelhi@gmail.com

EXPERTS

Our Company has received a written consent dated 23rd May, 2022 from our Statutory Auditors, M/s Dharam Taneja Associates, to include their names in this Draft Letter of Offer as an "expert", as defined under applicable laws, to the extent and in their capacity as statutory auditors, and in respect of the reports issued by them and the Statement of Tax Benefits, included in this Draft Letter of Offer. Such consent has not been withdrawn as on the date of this Draft Letter of Offer.



AKG EXIM LIMITED
(CIN- L00063DL2005PLC139045)

BANKER TO THE ISSUE AND REFUND BANK:

[•]

Self-Certified Syndicate Banks

The list of banks that have been notified by SEBI to act as SCSB for the ASBA process is provided on <http://www.sebi.gov.in/sebiweb/other/OtherAction.do?doRecognisedFpi=yes&intmId=34>. Details relating to Designated Branches of SCSBs collecting the ASBA application forms are available at the above mentioned link.

Credit rating

This being a Rights Issue of Equity Shares, no credit rating is required.

Debenture Trustee

As the Issue is of Equity Shares, the appointment of a debenture trustee is not required.

Monitoring Agency

Since the size of the Issue is less than Rs. 10,000 Lakh, our Company is not required to appoint a monitoring agency.

Appraising Agency

None of the purposes for which the Net Proceeds are proposed to be utilized have been appraised by any bank or financial institution.

Underwriting

This Issue is not underwritten and our Company has not entered into any underwriting arrangement.

Minimum Subscription

The objects of the Issue are meeting the Working Capital Requirements and General Corporate Purpose, and do not involve financing of capital expenditure for a project.



AKG EXIM LIMITED
(CIN- L00063DL2005PLC139045)

Further, our Promoters and Promoter Group have undertaken that they will subscribe to the full extent of their Rights Entitlements and that they shall not renounce their Rights Entitlements (except to the extent of renunciation by any of them in favour of any other Promoter or member of the Promoter Group) subject to the aggregate shareholding of our Promoters and Promoter Group being compliant with the minimum public shareholding requirements under the SCRR and the SEBI Listing Regulations.

Accordingly, in terms of Regulation 86(1) of the SEBI ICDR Regulations, the requirement of minimum subscription is not applicable to the Issue.

FILLING OF THIS DRAFT LETTER OF OFFER:

SEBI vide the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) (Fourth Amendment) Regulations, 2020 has amended Regulation 3(b) of the SEBI ICDR Regulations as per which the threshold of filing of Draft Letter of Offer with SEBI for rights issues has been increased. The threshold of the rights issue size under Regulation 3 (b) of the SEBI ICDR Regulations has been increased from Rupees ten crores to Rupees fifty crores. Since the size of this Issue falls below this threshold, this Draft Letter of Offer will be filed with the Stock Exchanges and not with SEBI. However, the Letter of Offer will be submitted with SEBI for information and dissemination and will be filed with the Stock Exchanges.

ISSUE SCHEDULE:

The subscription will open upon the commencement of the banking hours and will close upon the close of banking hours on the dates mentioned below:

Issue Opening Date	[•]
Last Date of Market renunciation of rights entitlements#	[•]
Issue Closing Date*	[•]

Eligible Equity Shareholders are requested to ensure that renunciation through off-market transfer is completed in such a manner that the Rights Entitlements are credited to the demat account of the Renouncees on or prior to the Issue Closing Date.

* Our Board or a duly authorized committee thereof will have the right to extend the Issue Period as it may determine from time to time but not exceeding 30 days from the Issue Opening Date (inclusive of the Issue Opening Date). Further, no withdrawal of Application shall be permitted by any Applicant after the Issue Closing Date.

Please note that if Eligible Equity Shareholders holding Equity Shares in physical form as on Record Date, have not provided the details of their demat accounts to our Company or to the Registrar, they are required to provide their demat account details to our Company or the Registrar not later than two Working Days prior to the Issue Closing Date, i.e., [•] to enable the credit of the Rights Entitlements by way of transfer from the demat suspense escrow account to their respective demat accounts, at least one day before the Issue Closing Date, i.e., [•].

Investors are advised to ensure that the Application Forms are submitted on or before the Issue Closing Date. Our Company or the Registrar will not be liable for any loss on account of non-submission of Application Forms on or before the Issue Closing Date. For details on submitting Application Forms, see



"Terms of the Issue - Process of making an Application in the Issue" beginning on page 134 of this Draft Letter of Offer.

The details of the Rights Entitlements with respect to each Eligible Equity Shareholders can be accessed by such respective Eligible Equity Shareholders on the website of the Registrar at www.masserv.com after keying in their respective details along with other security control measures implemented thereat. For further details, see "Terms of the Issue - Credit of Rights Entitlements in demat accounts of Eligible Equity Shareholders" beginning on page 146 of this Draft Letter of Offer.

Please note that if no Application is made by the Eligible Equity Shareholders of Rights Entitlements on or before Issue Closing Date, such Rights Entitlements shall get lapsed and shall be extinguished after the Issue Closing Date. No Equity Shares for such lapsed Rights Entitlements will be credited, even if such Rights Entitlements were purchased from market and purchaser will lose the premium paid to acquire the Rights Entitlements. Persons who are credited the Rights Entitlements are required to make an application to apply for Equity Shares offered under Rights Issue for subscribing to the Equity Shares offered under Issue.

CAPITAL STRUCTURE

The share capital of our Company as on the date of this Draft Letter of Offer is set forth below:

(Rs. in Lakh, except the shares data)

	Particulars	Aggregate value at face value	Aggregate value at Issue Price
A.	AUTHORIZED SHARE CAPITAL		
	3,25,00,000 Equity Shares of Rs. 10 each	3250.00	-
B.	ISSUED, SUBSCRIBED AND PAID-UP CAPITAL BEFORE THE ISSUE		
	1,05,92,192 Equity Shares of Rs. 10 each	1059.22	-
C.	PRESENT ISSUE BEING OFFERED TO THE EXISTING EQUITY SHAREHOLDERS THROUGH THIS DRAFT LETTER OF OFFER ⁽¹⁾		
	Upto [●] Equity Shares at an Issue Price of Rs. [●] per Equity Share	[●]	[●]
D.	ISSUED, SUBSCRIBED AND PAID UP CAPITAL AFTER THE ISSUE⁽²⁾		
	Upto [●] Equity Shares of face value of Rs. 10 each fully paid up	[●]	[●]
E.	SECURITIES PREMIUM ACCOUNT		
	Before the Issue		381.68
	After the Issue		[●]

(1) The Issue has been authorized by a resolution of our Board passed at its meeting held on 9th April, 2022 pursuant to Section 62 of the Companies Act, 2013.

(2) Assuming full subscription for and allotment of the Rights Entitlement.

Notes to the Capital Structure:

- Our Company does not have any employee stock option scheme or employee stock purchase scheme.
- Our Company does not have any outstanding warrants, options, convertible loans, debentures or any other securities convertible at a later date into Equity Shares, as on the date of this Draft Letter of Offer, which would entitle the holders to acquire further Equity Shares.

3. Shareholding of Promoter and Promoter Group:

The details of specified securities held by the Promoter and Promoter Group including the details of lock-in, pledge and encumbrance on such securities as on the date of this Draft Letter of Offer are set forth hereunder:



AKG EXIM LIMITED
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Sr. No.	Name of Promoter Promoter Group	Category	No. of Equity Shares held	% of total share capital	Details of Equity Shares pledged/ encumbered		Details of Equity Shares locked-in	
					No. of Equity Shares	% of total share capital	No. of Equity Shares	% of total share capital
1.	Rajeev Goel	Promoter	22,072	0.21	-	-	-	-
2.	Mahima Goel	Promoter Group	66,04,182	62.35	-	-	-	-
3.	Ashwini Gupta	Promoter Group	320	-	-	-	-	-

Except as disclosed above, none of the Equity Shares held by our Promoter and Promoter Group are pledged with any bank or institution, locked-in or otherwise encumbered.

4. No Equity Shares have been acquired by the Promoter or members of the Promoter Group in the year immediately preceding the date of this Draft Letter of Offer.

5. Intention and extent of participation in the Issue by the Promoter and Promoter Group

Our Promoters have undertaken to subscribe to the full extent of their Rights Entitlements in the Issue and have also confirmed that they shall not renounce their Rights Entitlements (except to the extent of renunciation by any of them in favour of any other Promoters or member of the Promoter Group). Further, our Promoters and Promoter Group reserve the right to apply for, and subscribe to, additional Rights Equity Shares over and above their Rights Entitlements (including unsubscribed portion of the Issue, if any), subject to compliance with the minimum public shareholding requirements, as prescribed under the SCRR and the SEBI Listing Regulations.

The acquisition of Rights Equity Shares by our Promoters and our Promoter Group, over and above their Rights Entitlements shall not result in a change of control of the management of our Company and shall be in compliance with the SEBI SAST Regulations and in case if acquisition of Rights Equity Shares by our Promoters and our Promoter Group, over and above their Rights Entitlements triggers open offer obligation under SEBI SAST Regulations, our Promoters and our Promoter Group shall comply with the same. Our Company is in compliance with Regulation 38 of the SEBI Listing Regulations and will continue to comply with the minimum public shareholding requirements under the Applicable Law.

6. All the Equity Shares of our Company are fully paid-up as on the date of this Draft Letter of Offer. Further, the Equity Shares offered in the Rights Issue shall be made fully paid at the time of their allotment.
7. At any given time, there shall be only one denomination of the Equity Shares of our Company, excluding any equity shares with superior rights, if any, issued by our Company.
8. The ex-rights price per Equity Share arrived in accordance with Regulation 10(4)(b) of the SEBI Takeover Regulations is [●].
9. The details of the shareholders holding more than 1% of the share capital of the Company as on March 31, 2022 are as under:



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Sr. No.	Name of Shareholders	No. of Equity Shares held	% of total share capital
1	Mahima Goel	66,04,182	62.35
2	Piyush Chandrakumar Rathi	2,66,400	2.52
3	Savita Chandrakumar Rathi	2,64,200	2.49
4	Marvel Realtech Private Limited	2,00,000	1.89
5	R D Buildsec LLP	1,59,542	1.51
6	Radhika Ashish Pujara	1,54,200	1.46
7	Anjali Agarwal	1,33,414	1.26
8	Vijay Kumar Arya	1,25,616	1.19
9	Apurv Aggarwal	1,13,795	1.07

10. Shareholding Pattern of our Company

Shareholding Pattern of the Equity Shares of our Company as per the last filing with the Stock Exchange, i.e., as on March 31, 2022 can be accessed on the website of the NSE at <https://www.nseindia.com/companies-listing/corporate-filings-shareholding-pattern?symbol=AKG&tabIndex=equity>

The statement showing the holding of Equity Shares of persons belonging to the category “Promoter and Promoters Group” as on March 31, 2022 can be accessed on the website of the NSE at <https://www.nseindia.com/companies-listing/corporate-filings-shareholding-pattern?symbol=AKG&tabIndex=equity>

The Statement of showing the details of shares pledged, encumbrance by promoters and promoter group as on March 31, 2022 can be accessed on the website of NSE at <https://www.nseindia.com/companies-listing/corporate-filings-shareholding-pattern?symbol=AKG&tabIndex=equity>

11. Details of options and convertible securities outstanding as on the date of this Draft Letter of Offer

There are no outstanding options or convertible securities, including any outstanding warrants or rights to convert debentures, loans or other instruments convertible into our Equity Shares as on the date of this Draft Letter of Offer.

OBJECTS OF THE ISSUE

Our Company proposes to utilize the net proceeds from the Issue towards funding the following objects.

1. To part finance Incremental Working Capital;
 2. To meet General corporate purposes;
 3. To meet the expenses of the Issue.
- (Collectively, referred herein as the “objects”).

The main objects clause of our Memorandum of Association and the objects incidental and ancillary to the main objects enables us to undertake the activities for which funds are being raised in the Issue. The existing activities of our Company are within the objects clause of our Memorandum of Association.

Utilization of Net Proceeds

The details of the proceeds of the Issue are summarized below:

(Rs. In Lakhs)

S. No.	Particulars	Amounts*
1)	Gross Proceeds	Upto 2500.00
2)	(Less) Issue related expenses	[•]*
3)	Net Proceeds	[•]*

* To be finalized on determination of Issue Price.

UTILISATION OF NET PROCEEDS

We intend to utilise the Net Proceeds from the Issue, in the manner set below:

(Rs. In lakhs)

S.No.	Particulars	Amounts	% of gross proceeds	% of Net proceeds
3.	To part finance incremental Working Capital of the Company.	Upto 2500.00	[•]*	[•]*
4.	To meet General corporate purposes.	[•]*	[•]*	[•]*
5.	To meet the expenses of the Issue.	[•]*	[•]*	[•]*
	Total	[•]*	[•]*	[•]*

* To be finalized on determination of Issue Price.

Schedule of implementation/ Utilization of Issue Proceeds

Our Company proposes to deploy the Net Proceeds in the aforesaid objects as follows:



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(Rs. In lakhs)

Sr. No.	Particulars	Amount Proposed to be Deployed from Issue Proceeds	Estimated Schedule of Deployment of Net Proceeds
			FY 2022-23
1.	To part finance incremental Working Capital of the Company.	Upto 2500.00	[●]*
2.	To meet General corporate purposes.	[●]*	[●]*
3.	To meet the expenses of the Issue.	[●]*	[●]*
	Total	[●]*	[●]*

* To be finalized on determination of Issue Price.

To the extent our Company is unable to utilize any portion of the Net Proceeds towards the Objects, as per the estimated schedule of deployment specified above, Our Company shall deploy the Net Proceeds in the subsequent Financial Years towards the Objects.

MEANS OF FINANCE:

Our Company proposes to meet the entire requirement of funds for the objects of the Issue from the Net Proceeds. Accordingly, our Company confirms that there is no requirement to make firm arrangements of finance through verifiable means towards at least 75% of the stated means of finance for the aforesaid object, excluding the amount to be raised from the Issue.

The fund requirement and deployment is based on internal management estimates and our Company's current business plan and is subject to change in light of changes in external circumstances or costs, other financial conditions, business or strategy. These estimates have not been appraised by any bank or financial institution.

Any amount, deployed by our Company out of internal accruals towards the aforementioned objects till the date of receipt of Issue Proceeds shall be recouped by our Company from the Issue Proceeds of the Issue. In case of delays in raising funds from the Issue, our company may deploy certain amounts towards any of the above mentioned Objects through a combination of Internal Accruals or Loans (Bridge Financing) and in such case the Funds raised shall be utilized towards repayment of such Loans or recouping of Internal Accruals. However, we confirm that no bridge financing has been availed as on date, which is subject to being repaid from the Issue Proceeds.

As we operate in competitive environment, we may have to revise our expenditure and fund requirements as a result of variations in cost estimates, exchange rate fluctuations and external factors which may not be within the control of our management. This may entail rescheduling and revising the planned expenditures and fund requirements and increasing or decreasing expenditures for a particular purpose at the discretion of our management, within the objects.

For further details on the risks involved in our business plans and executing our business strategies, please see the section titled "Risk Factors" beginning on page 24 of this Draft Letter of offer.

DETAILS OF THE OBJECTS

The details of the objects of the Issue are set out below:

1. TO PART FINANCE INCREMENTAL WORKING CAPITAL REQUIREMENTS OF THE COMPANY.

Our Business is a working capital intensive industry. The increasing operations of our company will in turn lead to the increase in the requirement of working capital. The lead time for procuring the products is high and also in order to ensure readily available customized product along with a low lead time for our clients, we enjoy a lower credit period. Further, we are required to provide sufficient credit period to our clients resulting in high receivables and we enjoy minimum credit from our suppliers through against the same. We intend to increase our turnover over the years for which we would be required to provide extended credit period to our customers, but the credit period that we avail from our suppliers shall not increase substantially. This would require us to have adequate working capital to ensure a smooth and uninterrupted flow of our business operations. Accordingly, we expect a further increase in the working capital requirements in view of current and potential business operations that we may undertake. Accordingly, we have proposed to use upto Rs. 2500.00 Lakhs out of the issue proceeds to meet the increase in long term working capital requirements.

(Rs. In lakhs)

Sr. No.	Particulars	31.03.2021	31.03.2022	31.03.2023
		Audited	Estimated	Projected
A.	Current Assets			
	Inventories	313.95	392.44	784.88
	Short Term loans and advances	58.85	67.68	84.60
	Trade Receivable	2309.99	2887.49	4031.23
	Current Investments	-	-	-
	Cash & Bank Balances	1.85	2.13	2.66
	Other Current Assets	622.35	777.94	972.42
	Total Current Assets	3306.99	4127.67	5875.78
B.	Current Liabilities			
	Trade payable	288.68	317.55	349.30
	Other current liabilities & Provisions	99.38	109.32	120.25
	Total Current Liabilities	388.06	426.866	469.553
C.	Working Capital Gap (A-B)	2918.93	3700.8	5406.23
	Incremental Working Capital	-	781.87	2487.30
D.	Owned Funds /Internal Accruals / Bank Borrowings	2918.93	3700.8	2906.23
E.	Working Capital funding through Issue Proceeds	-	-	2500.00

As per our estimates we propose to utilise upto Rs. 2500.00 Lakhs out of the issue proceeds to meet the working capital requirements.

Justification of Holding Level

Inventories	Higher inventory requirement is in line with increase in projected sales volume from existing business and revenue generation from expansion of business.
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Trade Receivable	We have assumed Trade Receivable holding period level in financial year 2021-22 and 2022-23 slightly higher than previous financial year's holding period levels as we are expecting to allow more lenient credit period to our clients. Increase in debtors will be in line with increase in projected sales volume and revenue generation.
Trade Payables	Increase in creditors will be in line with increase in projected purchase of goods and services to service higher sales volume for existing business and future expansion of existing plant.

2. TO FINANCE THE GENERAL CORPORATE PURPOSE

Our Company proposes to use Rs. [●]* lakhs towards general corporate purposes, being not exceeding 25% of the gross proceeds of the Issue.

Our Board will have flexibility in applying the amount towards general corporate purposes, including repayment of outstanding loans, funding our growth opportunities including strategic initiatives, investment in Subsidiary Company(ies) meeting expenses incurred in the ordinary course of business including salaries and wages, administration expenses, advertisement, brand building expenses, insurance related expenses, meeting of exigencies which our Company may face in course of business and any other unforeseen purpose as may be approved by the Board or a duly appointed committee from time to time, subject to compliance with the necessary provisions of the Companies Act.

Our management will have flexibility in utilizing any amounts for general corporate purposes in accordance with policies of our Board. The quantum of utilization of funds towards any of the purposes mentioned above will be determined by the Board, based on the amount actually available under this head and the business requirements of our Company, from time to time.

** To be finalized on determination of Issue Price.*

3. ISSUE RELATED EXPENSES

The expenses for this Issue include issue management fees, underwriting fees, registrar fees, legal advisor fees, printing and distribution expenses, advertisement expenses, depository charges and listing fees to the Stock Exchange, among others. The total expenses for this Issue are estimated not to exceed Rs. [●]* Lakhs.

Particulars	Amount (Rs. in Lakhs)	% of Total Issue Expenses	% of Total Issue Size
Issue management fees, Payment to other intermediaries such as Legal Advisors, Registrars etc.	[●]*	[●]*	[●]*
Printing & Stationery, Distribution, Postage, etc.	[●]*	[●]*	[●]*
Advertisement & Marketing Expenses	[●]*	[●]*	[●]*
Regulatory & other expenses	[●]*	[●]*	[●]*
Miscellaneous Expenses	[●]*	[●]*	[●]*



AKG EXIM LIMITED
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Particulars	Amount (Rs. in Lakhs)	% of Total Issue Expenses	% of Total Issue Size
Total	[●]*	[●]*	[●]*

* To be finalized on determination of Issue Price.

Details of funds already deployed till date and sources of funds deployed

The funds deployed up to 30th April, 2022 pursuant to the object of this Issue as certified by M/s. Dharam Taneja Associates, Chartered Accountants pursuant to their certificate dated 23rd May, 2022 is given below:

Deployment of funds	Amount (Rs. In Lakhs)
Issue Related Expenses	2.00
Object Related Expenses	-
Total	2.00

Sources of funds	Amount (Rs. In Lakhs)
Internal Accruals	2.00
Bank Finance	-
Total	2.00

BRIDGE FINANCING

We have not entered into any bridge finance arrangements that will be repaid from the Net Issue Proceeds.

APPRAISAL BY APPRAISING AGENCY

None of the Objects have been appraised by any bank or financial institution or any other independent third party organization.

INTERIM USE OF FUNDS

Our Company, in accordance with the policies formulated by our Board from time to time, will have flexibility to deploy the Net Proceeds. Pending utilization of the Issue Proceeds for the Objects of the Issue described above, our Company shall deposit the funds only in Scheduled Commercial Banks included in the Second Schedule of Reserve Bank of India Act, 1934.

In accordance with Section 27 of the Companies Act, 2013, our Company confirms that, pending utilisation of the proceeds of the Issue as described above, it shall not use the funds from the Issue Proceeds for any investment in equity and/or real estate products and/or equity linked and/or real estate linked products.



MONITORING UTILIZATION OF FUNDS

As the size of the Issue does not exceed Rs. 10,000 lakhs, in terms of Regulation 16 of the SEBI Regulations, our Company is not required to appoint a monitoring agency for the purposes of this Issue. Our Board and Audit Committee shall monitor the utilization of the Net Proceeds.

Pursuant to Regulation 32 of the Listing Regulations, our Company shall on a Quarterly yearly basis disclose to the Audit Committee the uses and application of the Issue Proceeds. Until such time as any part of the Issue Proceeds remains unutilized, our Company will disclose the utilization of the Issue Proceeds under separate heads in our Company's balance sheet(s) clearly specifying the amount of and purpose for which Issue Proceeds have been utilized so far, and details of amounts out of the Issue Proceeds that have not been utilized so far, also indicating interim investments, if any, of such unutilized Issue Proceeds. In the event that our Company is unable to utilize the entire amount that we have currently estimated for use out of the Issue Proceeds in a Fiscal Year, we will utilize such unutilized amount in the next financial year.

Further, in accordance with Regulation 32(1) (a) of the Listing Regulations our Company shall furnish to the Stock Exchanges on a Quarterly basis, a statement indicating material deviations, if any, in the utilization of the Issue Proceeds for the objects stated in this Draft Letter of offer.

CONFIRMATION REGARDING PURCHASE OF SECOND-HAND EQUIPMENT AND MACHINERY

No second-hand equipment and machinery is proposed to be purchased by our Company from the Net Proceeds.

OTHER CONFIRMATIONS

No part of the proceeds of the Issue will be paid by us to the Promoters and Promoter Group, the Directors, associates or Key Management Personnel, except as stated above and in the normal course of business and in compliance with applicable.



AKG EXIM LIMITED
(CIN- L00063DL2005PLC139045)

STATEMENT OF SPECIAL TAX BENEFITS

STATEMENT OF POSSIBLE TAX BENEFITS AVAILABLE TO THE COMPANY AND ITS SHAREHOLDERS AS PER THE CERTIFICATE ISSUED BY STATUTORY AUDITORS OF THE COMPANY

To,

**The Board of Directors,
AKG Exim Limited**

7th Floor, H.B. Twin Tower, Netaji Subhash Place, Pitampura, Delhi-110034

Dear Sirs,

Subject: Proposed Rights Issue of equity shares with a Face value of Rs. 10/- each by Akg Exim Limited (the "Company") (the "Issue")

We hereby confirm that the enclosed statement states the possible special direct tax benefits available to the Company and the shareholders of the Company under the Income Tax Act, 1961 ("Act") as amended from time to time, presently in force in India. Several of these benefits are dependent on the Company or its shareholders fulfilling the conditions prescribed under the relevant provisions of the Act. Hence, the ability of the Company or its shareholders to derive the tax benefits is dependent upon fulfilling such conditions, which based on the business imperatives, the Company may or may not choose to fulfill.

This statement is only intended to provide general information to the investors and hence is neither designed nor intended to be a substitute for professional tax advice. In view of the individual nature of the tax consequences, the changing tax laws, each investor is advised to consult his or her own tax consultant with respect to the specific tax implications arising out of their participation in the rights issue of equity shares of the Company particularly in view of the fact that certain recently enacted legislation may not have a direct legal precedent or may have a different interpretation on the benefits, which an investor can avail. Neither are we suggesting nor are we advising the investor to invest money based on this statement.

The contents of the enclosed statement are based on the information, explanations and representations obtained from the Company and on the basis of their understanding of the business activities and operations of the Company. We do not express any opinion or provide any assurance as to whether:

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

This statement is intended solely for information and for inclusion in the Draft Letter of Offer in relation to the Issue of equity shares of the Company and is not to be used, circulated or referred to for any other purpose without our prior written consent. Our views are based on the existing provisions of law referred to earlier and its interpretation, which are subject to change from time to time.

We shall not be liable to any claims, liabilities or expenses relating to this assignment except to the extent of fees relating to this assignment, as finally judicially determined to have resulted primarily from bad faith or intentional misconduct. We will not be liable to any other person in respect of this Statement.

**For M/s. Dharam Taneja Associates
Chartered Accountants**

Firm Registration No.: 003563N

Sd/-

**CA Varun Taneja
Partner**

M.No. 095325

Date: 23rd May, 2022

Place: Delhi



AKG EXIM LIMITED
(CIN- L00063DL2005PLC139045)

Annexure

ANNEXURE TO THE STATEMENT OF SPECIAL TAX BENEFITS AVAILABLE TO THE COMPANY AND ITS SHAREHOLDERS UNDER THE APPLICABLE TAX LAWS IN INDIA

I Special Tax Benefits available to the Company under the Act:

There are no special tax benefits available to the Company.

II. Special Tax Benefits available to the Shareholders under the Act:

There are no special tax benefits available for the shareholders of the Company under the provisions of the Act.

For M/s. Dharam Taneja Associates
Chartered Accountants
Firm Registration No.: 003563N
Sd/-
CA Varun Taneja
Partner
M.No. 095325
Date: 23rd May, 2022
Place: Delhi



SECTION V: ABOUT OUR COMPANY

OUR INDUSTRY

The information contained in ‘Industry Overview’ in this section is derived from publicly available sources. Neither we, nor any other person connected with the Issue has independently verified this information. Industry sources and publications generally state that the information contained therein has been obtained from sources generally believed to be reliable, but that their accuracy, completeness and underlying assumptions are not guaranteed and their reliability cannot be assured. Industry publications are also prepared based on information as of specific dates and may no longer be current or reflect current trends.

Shareholders should note that this is only a summary of the industry in which we operate and does not contain all information that should be considered before investing in the Equity Shares. Before deciding to invest in the Equity Shares, shareholders should read this entire Draft Letter of Offer, including the information in the sections “Risk Factors” and “Financial Information” on pages 24 and 101, respectively of this Draft Letter of Offer. An investment in the Equity Shares involves a high degree of risk. For a discussion of certain risks in connection with an investment in the Equity Shares, please see the section ‘Risk Factors’ on page 24 of this Draft Letter of Offer.

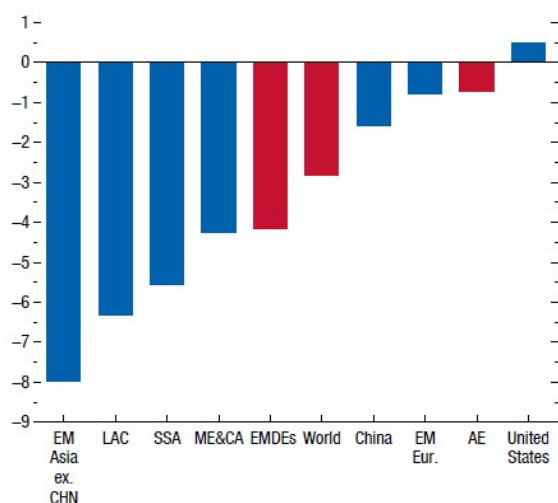
GLOBAL PROSPECTS AND POLICIES

After an estimated contraction of -3.3 percent in 2020, the global economy is projected to grow at 6 percent in 2021, moderating to 4.4 percent in 2022. The contraction for 2020 is 1.1 percentage points smaller than projected in the October 2020 WEO, reflecting the higher-than-expected growth outturns in the second half of 2020 for most regions after lockdowns were eased. The projections for 2021 and 2022 are 0.8 percentage point and 0.2 percentage point stronger than in the previous forecast, reflecting additional fiscal support in a few large economies and the anticipated vaccine-powered recovery in the second half of the year. This pace reflects continued adaptation of all sectors of the economy to the challenging health situation.

The strength of the projected recovery varies across countries, depending on the severity of the health crisis, the extent of domestic disruptions to activity (related to countries’ reliance on contact-intensive sectors), the exposure to cross-border spillovers, and— importantly—the effectiveness of policy support to limit persistent damage.

Beyond 2022 global growth is projected to moderate to 3.3 percent into the medium term. Persistent damage to supply potential across both advanced and emerging market economies and slower labor force growth because of population aging (largely in advanced economies, but also in a few emerging market economies), and necessary rebalancing to a sustainable growth path in China, are all expected to

Figure 1.16. Medium-Term GDP Losses Relative to Pre-COVID-19, by Region
(Revisions to projected 2024 GDP levels between the January 2020 and April 2021 WEO forecasts, percent)



Source: IMF staff estimates.
Note: AE = advanced economies; EM Asia ex. CHN = emerging and developing Asia excluding China; EM Eur. = emerging and developing Europe; EMDEs = emerging market and developing economies; LAC = Latin America and the Caribbean; ME&CA = Middle East and Central Asia; SSA = sub-Saharan Africa.

weigh on the growth outlook for the global economy in the medium term. GDP levels are projected to remain well below the pre-pandemic trend path through 2024 for most countries (Figure 1.16).

In *advanced economies*, occasional regional restrictions will likely be necessary at times to stem the progression of new strains of the virus. As the vulnerable population gets vaccinated, contact-intensive activities are expected to resume and drive a significant pickup in growth thanks to pent-up demand funded by accumulated savings in 2020. Recovery paths also vary within the group. The United States is projected to return to end-of-2019 activity levels in the first half of 2021 and Japan in the second half. In the euro area and the United Kingdom, activity is expected to remain below end-of-2019 levels into 2022. The gaps can be traced back to differences in behavioral and public health responses to infections, flexibility and adaptability of economic activity to low mobility, preexisting trends, and structural rigidities predating the crisis.

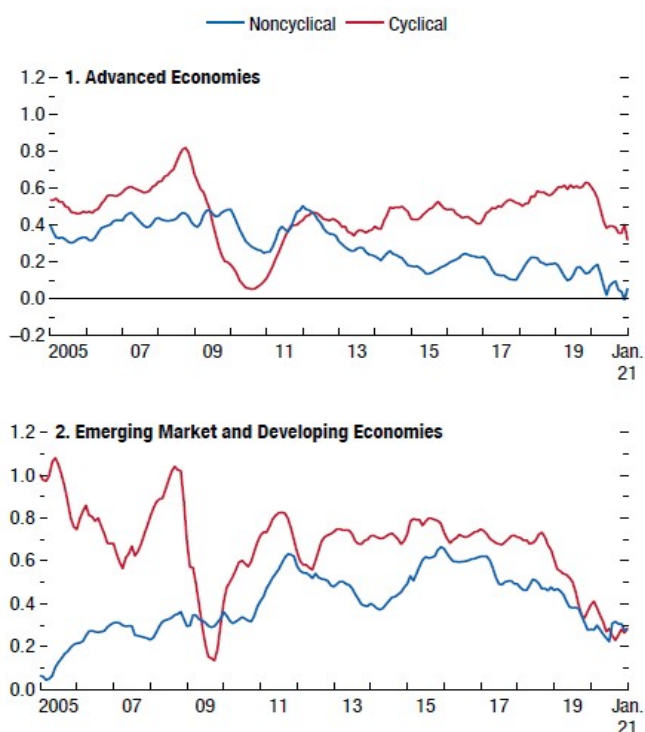
With respect to the October 2020 WEO, projections for 2021 have been revised down in Europe and up in Japan and the United States. The downward revision in Europe is more than offset by stronger-than-expected growth in the United States and Japan, reflecting additional fiscal support legislated in both countries at the end of 2020. In addition, the Biden administration’s \$1.9 trillion rescue package is expected to further boost GDP over 2021-22, with significant spillovers to main US trading partners.

European countries (for example, Cyprus, Italy, Malta, Portugal, Spain), were able to salvage part of the summer tourist season by reopening in mid-2020. But this was followed by a surge in infections that forced new lockdowns in the last months of 2020, carrying over to 2021. GDP growth for 2022 has been revised up by 0.7 percentage point to 3.8 percent in the euro area and by 1.9 percentage points in the United Kingdom to 5.1 percent.

In *emerging market and developing economies*, vaccine procurement data suggest that effective protection will remain unavailable for most of the population in 2021. Lockdowns and containment measures may be needed more frequently in 2021 and 2022 than in advanced economies, increasing the likelihood of medium-term scarring effects on the potential output of these countries. Considerable differentiation is expected between China—where effective containment measures, a forceful public investment

Figure 1.17. Headline Inflation: Cyclical and Noncyclical Contributions
 (Percentage points)

Price inflation (excluding food and energy) has dropped in sectors usually sensitive to fluctuations in aggregate demand (cyclical) and those that are not.



Sources: Eurostat; Haver Analytics; Organisation for Economic Co-operation and Development; and IMF staff calculations.
 Note: The figure plots the time fixed effects of regressions in which three-month trailing averages of contributions to headline inflation are regressed on country and time fixed effects, with the weights being the GDP in purchasing-power-parity terms. The contribution of a component is defined as its year-over-year price change multiplied by its weight in the headline consumer price index basket.

response, and central bank liquidity support have facilitated a strong recovery—and others. Tourism-based economies within this group (such as Fiji, Seychelles, Thailand) face particularly difficult prospects considering the expected slow normalization of cross-border travel. Recovery profiles vary, based on regional differences in the severity of the pandemic, economic structure (employment and GDP shares of contact-intensive sectors), exposure to specific shocks (for instance, due to reliance on commodity exports), and the effectiveness of the policy response to combat the fallout.

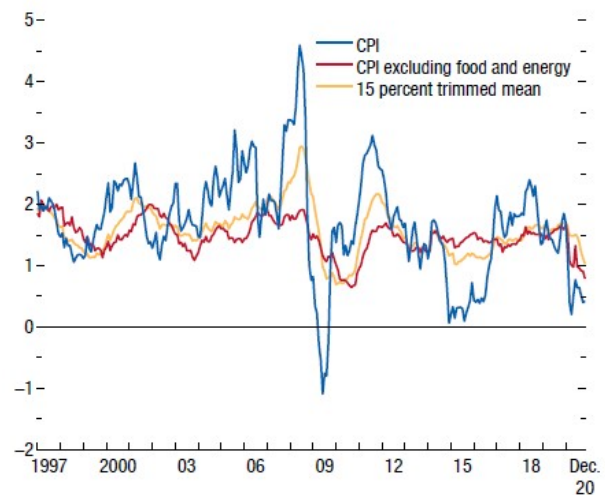
Inflation Pressure to Remain Contained in Most Countries

As noted, commodity prices (particularly for oil) are expected to firm up further in the months ahead. Given their record-low levels of a year ago, firmer prices should mechanically lift consumer price indices, and headline inflation, in particular, could turn volatile in coming months. The volatility should be short lived. Baseline projections show a return of inflation to its long-term average as the remaining slack subsides only gradually and commodity-driven base effects fade away. The subdued outlook reflects developments in the labor market, where subdued wage growth and weak worker bargaining power have been compounded recently by high unemployment, underemployment, and lower participation rates. Moreover, various measures of underlying inflation remain low. IMF staff analysis on sectoral price developments points to muted price pressure, both in sectors where pricing is typically less sensitive to the business cycle and in sectors where prices tend to respond to aggregate demand fluctuations (Figure 1.17). Trimmed-mean inflation rates (which eliminate extreme price changes from the price distribution every month to filter out underlying inflation and provide slow-moving, unbiased estimates of price pressure) point to declining, not increasing, inflation pressure (Figure 1.18).

Measuring slack has arguably become more difficult during the pandemic as both supply and demand have shifted. Nevertheless, even if output gaps are less negative than currently estimated, the implications for inflation should be relatively moderate. Phillips curves have become flatter in recent years—reflecting various factors, including globalization, automation, rising market concentration, and associated higher monopsony power of firms in labor markets. For the same reason that inflation did not drop much when output gaps were large and negative during the global financial crisis, inflation is unlikely to increase much—unless output gaps become positive and very large for an extended period of time and monetary policy does not react to rising inflation expectations.

Figure 1.18. Trend Inflation in Advanced Economies
 (Percent)

Trimmed-mean inflation points to declining inflation pressure in advanced economies, in line with various measures of slack.



Sources: Cleveland Federal Reserve; Haver Analytics; and IMF staff calculations.
 Note: CPI = consumer price index.

(Source: www.imf.org)

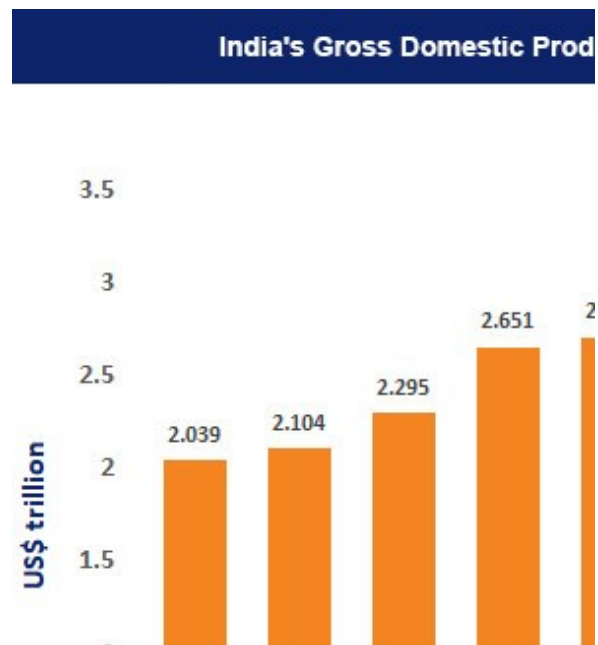
Indian Economy Overview

Introduction

India has emerged as the fastest growing major economy in the world and is expected to be one of the top three economic powers in the world over the next 10-15 years, backed by its robust democracy and strong partnerships.

Market size

- India's nominal gross domestic product (GDP) at current prices is estimated to be at Rs. 232.15 trillion (US\$ 3.12 trillion) in FY2021-22.,
- India is the third-largest unicorn base in the world with over 83 unicorns collectively valued at US\$ 277.77 billion, as per the Economic Survey. By 2025, India is expected to have 100 unicorns, which will create ~1.1 million direct jobs according to the Nasscom-Zinnov report 'Indian Tech Start-up'.
- India needs to increase its rate of employment growth and create 90 million non-farm jobs between 2023 and 2030s, for productivity and economic growth according to McKinsey Global Institute. The net employment rate needs to grow by 1.5% per year from 2023 to 2030 to achieve 8-8.5% GDP growth between 2023 and 2030.
- According to data from the Department of Economic Affairs, as of January 28, 2022, foreign exchange reserves in India reached the US\$ 634.287 billion mark.



Recent Developments

Recent economic developments in India are as follows:

- With an improvement in the economic scenario, there have been investments across various sectors of the economy. The private equity - venture capital (PE-VC) sector recorded investments worth US\$ 6.8 billion across 102 deals in November 2021 42% higher than November 2020. Some of the important recent developments in the Indian economy are as follows:
- India's merchandise exports between April 2021 and December 2021 were estimated at US\$ 299.74 billion (a 48.85% YoY increase). In December 2021, the Manufacturing Purchasing Managers' Index (PMI) in India stood at 56.4.
- The gross GST (Goods and Services Tax) revenue collection stood at Rs. 1.38 trillion (US\$ 18.42 billion) in January 2022. This was a 15% rise over a year ago.



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- According to the Department for Promotion of Industry and Internal Trade (DPIIT), FDI equity inflow in India stood at US\$ 547.2 billion between April 2000 and June 2021.
- India's Index of Industrial Production (IIP) for November 2021 stood at 128.5 against 126.7 for November 2020.
- Consumer Food Price Index (CFPI) - Combined inflation was 2.9% in 2021-22 (April-December) against 9.1% in the corresponding period last year.
- Consumer Price Index (CPI) - Combined inflation was 5.20% in 2021-2022 (April-December) against 6.6% in 2020-21
- Foreign portfolio investors (FPIs) invested Rs.50,009 crore (US\$ 6.68 billion) in the Calendar year 2021.
- The wheat procurement in Rabi 2021-22 and the anticipated paddy purchase in Kharif 2021-22 would include 1208 lakh (120.8 million) metric tonnes of wheat and paddy from 163 lakh (16.7 million) farmers, as well as a direct payment of MSP value of 2.37 lakh crore (US\$ 31.74 billion) to their accounts.

Government Initiatives

The Government of India has taken several initiatives to improve the economic condition of the country. Some of these are:

- The Union Budget of 2022-23 was presented on February 1, 2022, by the Minister for Finance & Corporate Affairs, Ms. Nirmala Sitharaman. The budget had four priorities PM GatiShakti, Inclusive Development, Productivity Enhancement and Investment and Financing of Investments. In the Union Budget 2022-23, effective capital expenditure is expected to increase by 27% at Rs. 10.68 lakh crore (US\$ 142.93 billion) to boost the economy. This will be 4.1% of the total Gross Domestic Production (GDP).
- Under PM GatiShakti Master Plan the National Highway Network will develop 25,000 km of new highways network which will be worth Rs. 20,000 crore (US\$ 2.67 billion). In 2022-23. Increased government expenditure is expected to attract private investments, with a production-linked incentive scheme providing excellent opportunities. Consistently proactive, graded, and measured policy support is anticipated to boost the Indian economy.
- On February 2022, Ms. Nirmala Sitharaman Minister for Finance & Corporate Affairs said that productivity linked incentive (PLI) schemes to be extended to 14 sectors for achieving the mission of AtmaNirbhar Bharat and create 60 lakh (6 million) and an additional production of Rs. 30 lakh crore (US\$ 401.49 billion) in the next 5 years.
- In the Union Budget of 2022-23, the government announced funding for the production linked incentive (PLI) scheme for domestic solar cells and module manufacturing of Rs. 24,000 crore (US\$ 3.21 billion).
- In the Union Budget of 2022-23, the government announced production linked incentive (PLI) scheme for Bulk Drugs which was an investment of Rs. 2500 crore (US\$ 334.60 million).
- In the Union Budget of 2022 Finance Minister Nirmala Sitharaman announced that a scheme for design-led manufacturing in 5G will be launched as part of the PLI scheme.



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- In September 2021, Union Cabinet approved major reforms in the telecom sector, which is expected to boost employment, growth, competition, and consumer interests. Key reforms include rationalization of adjusted gross revenue, rationalization of bank guarantees (BGs), and encouragement to spectrum sharing.
- In the Union Budget of 2022-23 the government has allocated Rs. 44,720 crore (US\$ 5.98 billion) to Bharat Sanchar Nigam Limited (BSNL) for capital investments in the 4G spectrum.
- Ms. Nirmala Sitharaman allocated Rs. 650 crore (US\$ 86.69 million) for Deep Ocean mission that seeks to explore vast marine living and non-living resources. Department of Space (DoS) has got Rs. 13,700 crore (US\$ 1.83 billion) in 2022-23 for several key space missions like Gaganyaan, Chandrayaan-3, and Aditya L-1 (sun).
- In May 2021, the government approved the production linked incentive (PLI) scheme for manufacturing advanced chemistry cell (ACC) batteries at an estimated outlay of Rs. 18,100 crore (US\$ 2.44 billion); this move is expected to attract domestic and foreign investments worth Rs. 45,000 crore (US\$ 6.07 billion).
- Ms. Nirmala Sitharaman announced in the Union Budget of 2022-23 that Reserve Bank of India (RBI) will issue Digital Rupee using blockchain and other technologies.
- In the Union Budget of 2022-23, Railway got an investment of Rs. 2.38 lakh crore (US\$ 31.88 billion) and over 400 new high-speed trains were announced. The concept of “One Station, One Product” was also introduced.
- To boost competitiveness Budget 2022 has announced to reform the 16-year-old Special Economic Zone (SEZ) act to enhance competitiveness this will be done to make it compatible with the World Trade Organisation (WTO).
- In June 2021, the RBI (Reserve Bank of India) announced that the investment limit for FPI (foreign portfolio investors) in the State Development Loans (SDLs) and government securities (G-secs) would persist unaffected at 2% and 6%, respectively, in FY22.
- To boost the overall audit quality, transparency and add value to businesses, in April 2021, the RBI issued a notice on new norms to appoint statutory and central auditors for commercial banks, large urban co-operatives and large non-banks and housing finance firms.
- In May 2021, the Government of India has allocated Rs. 2,250 crore (US\$ 306.80 million) for the development of the horticulture sector in 2021-22.
- In November 2020, the Government of India announced Rs. 2.65 lakh crore (US\$ 36 billion) stimulus package to generate job opportunities and provide liquidity support to various sectors such as tourism, aviation, construction and housing. Also, India's cabinet approved the production-linked incentives (PLI) scheme to provide -Rs. 2 trillion (US\$ 27 billion) over five years to create jobs and boost production in the country.
- Numerous foreign companies are setting up their facilities in India on account of various Government initiatives like Make in India and Digital India. Mr. Narendra Modi, Prime Minister of India, launched the Make in India initiative with an aim to boost the country's manufacturing



sector and increase the purchasing power of an average Indian consumer, which would further drive demand and spur development, thus benefiting investors. The Government of India, under its Make in India initiative, is trying to boost the contribution made by the manufacturing sector with an aim to take it to 25% of the GDP from the current 17%. Besides, the Government has also come up with the Digital India initiative, which focuses on three core components: the creation of digital infrastructure, delivering services digitally and increasing digital literacy.

- On January 29 2022 the National Asset Reconstruction Company Ltd (NARCL) will acquire bad loans worth up to Rs. 50,000 crore (US\$ 6.69 billion) about 15 accounts by March 31, 2022. India Debt Resolution Co. Ltd (IDRCL) will control the resolution process. This will clean up India's financial system and help fuel liquidity and boost the Indian Economy.
- National Bank for Financing Infrastructure and Development (NaBFID) is a bank that will provide non-recourse infrastructure financing and is expected to support projects from the first quarter of FY2022-23, it is expected to raise Rs. 4 lakh crore (US\$ 53.58 billion) in the next 3 years.
- By November 1, 2021, India and the United Kingdom hope to begin negotiations on a free trade agreement. The proposed FTA between these two countries is likely to unlock business opportunities and generate jobs. Both sides have renewed their commitment to boost trade in a manner that benefits all.
- In August 2021, NITI Aayog and Cisco collaborated to encourage women's entrepreneurship in India.
- In August 2021, Prime Minister Mr. Narendra Modi announced an initiative to start a national mission to reach the US\$ 400 billion merchandise export target by FY22.
- In August 2021, Prime Minister Mr. Narendra Modi launched digital payment solution, e-RUPI, a contactless and cashless instrument for digital payments.
- In June 2021, RBI Governor, Mr. Shaktikanta Das announced the policy repo rate unchanged at 4%. He also announced various measures including Rs. 15,000 crore (US\$ 2.05 billion) liquidity support to contact-intensive sectors such as tourism and hospitality.
- In June 2021, Finance Ministers of G-7 countries, including the US, the UK, Japan, Italy, Germany, France and Canada, attained a historic contract on taxing multinational firms as per which the minimum global tax rate would be at least 15%. The move is expected to benefit India to increase foreign direct investments in the country.
- In June 2021, the Indian government signed a US\$ 32 million loan with World Bank for improving healthcare services in Mizoram.
- In May 2021, the Government of India (GoI) and European Investment Bank (EIB) signed the finance contract for second tranche of EUR 150 million (US\$ 182.30 million) for Pune Metro Rail project.
- According to an official source, as of September 15, 2021, 52 companies have filed applications under the Rs. 5,866 crore (US\$ 796.19 million) production-linked incentive scheme for the white goods (air conditioners and LED lights) sector.



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- In May 2021, Union Cabinet has approved the signing of memorandum of understanding (MoU) on migration and mobility partnership between the Government of India, the United Kingdom of Great Britain and Northern Ireland.
- In April 2021, Minister for Railways and Commerce & Industry and Consumer Affairs, Food & Public Distribution, Mr. Piyush Goyal, launched 'DGFT Trade Facilitation' app to provide instant access to exporters/importers anytime and anywhere.
- In April 2021, Dr. Ahmed Abdul Rahman AlBanna, Ambassador of the UAE to India and Founding Patron of IFIICC, stated that trilateral trade between India, the UAE and Israel is expected to reach US\$ 110 billion by 2030.
- India is expected to attract investment of around US\$ 100 billion in developing the oil and gas infrastructure during 2019-23.
- The Government of India is going to increase public health spending to 2.5% of the GDP by 2025.

(Source: www.ibef.org)

AGRICULTURE AND ALLIED INDUSTRIES INDUSTRY REPORT

INTRODUCTION

India has the second-largest arable land resources in the world. With 20 agri-climatic regions, all the 15 major climates in the world exist in India. The country also has 46 of the 60 soil types in the world. India is the largest producer of spices, pulses, milk, tea, cashew, and jute, and the second largest producer of wheat, rice, fruits and vegetables, sugarcane, cotton, and oilseeds. Further, India is second in the global production of fruits and vegetables and is the largest producer of mango and banana. During 2019-20 crop year, food grain production reached a record of 296.65 million tonnes. For FY 2021-22, the government has set a target to increase production by 3.9%. Consumer spending in India will return to growth in 2022 post the pandemic-led contraction, expanding by as much as 7%. Private consumption expenditure (at constant prices) was estimated at Rs. 80.8 trillion (US\$ 1.08 trillion) in FY22 against Rs. 75.6 trillion (US\$ 1.01 trillion) in FY20.

Total area sown with rabi crops was 34.8 million hectares by November 27, 2020, 4% more than the previous season, and 2% above the average of the last five years. According to the Ministry of Agriculture, 44% of wheat and other rabi crops were harvested out of a total of 97 lakh hectares sown area in the 2020-21 rabi season. As of October 27, 2021, the total rabi area stood at 0.53 lakh hectares. A total of 50.90 lakh hectares of kharif crops will be sown in the kharif season of 2021-22. In the rabi marketing season 2021-22, the government purchased a record 43.33 MT of wheat. In case of pulses and oilseeds, the government through nodal agencies has procured total 1.04 million tonne at MSP value of US\$ 761.63 million (Rs. 5662.82 crores) so far in 2021.

Production of horticulture crops in India reached a record 331.05 million metric tonnes (MMT) in 2020-21 (as per 3rd advance estimate), an increase of 10.5 million metric tonnes over FY20. The production of fruits, flowers, spices and honey is expected to rise. India has the largest livestock population of around 535.78 million, which translates to around 31% of the world population. Milk production in the



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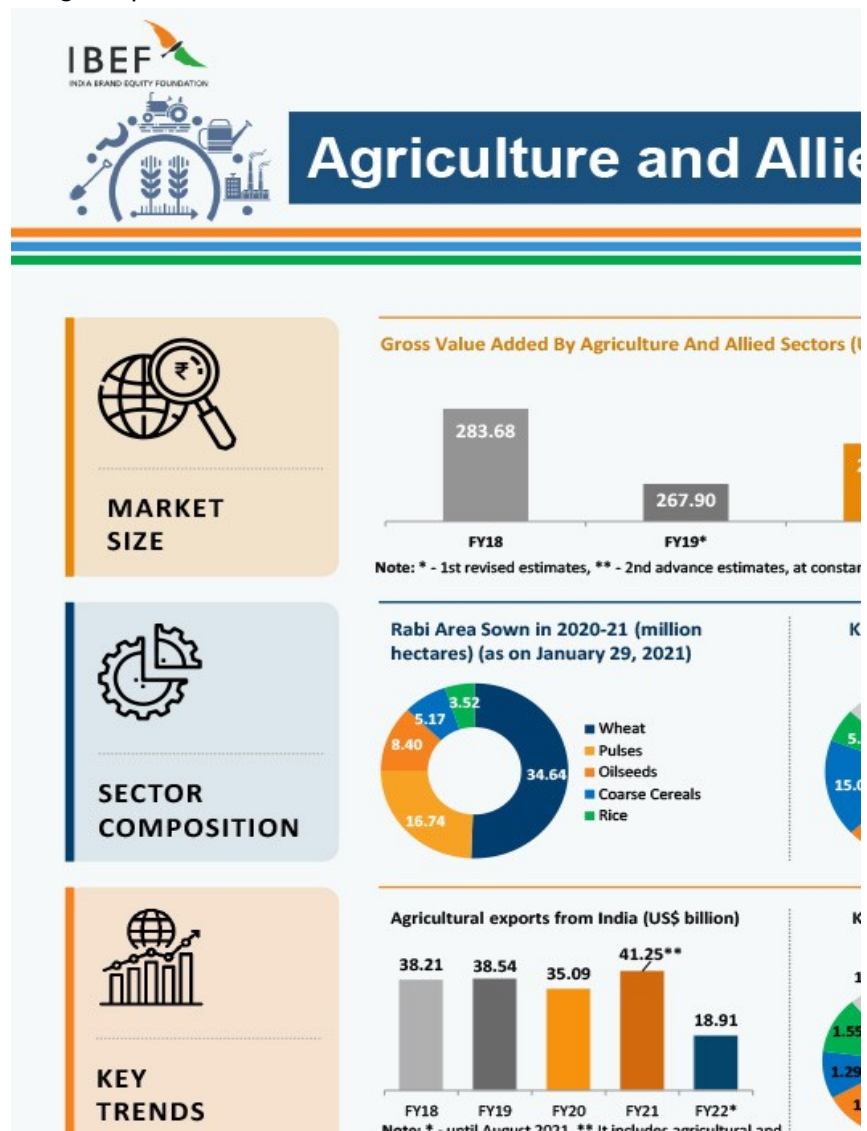
country is expected to increase to 208 MT in FY21 from 198 MT in FY20, registering a growth of 10% y-o-y.

India can be among the top five exporters of agro-commodities by shifting its focus on cultivation and effectively handholding farmers, according to the World Trade Centre. The total agricultural and allied products exports stood at US\$ 41.25 billion in FY21. The principal commodities that posted significant positive growth in exports between FY20 and FY21 were the following:

- Wheat and Other Cereals: 727% from Rs. 3,708 crore (US\$ 505 million) to Rs. 5,860 crore (US\$ 799 million)
- Non-Basmati Rice: 132% from Rs. 13,130 crore (US\$ 1,789) to Rs. 30,277 crore (US\$ 4,126 million)
- Soya Meal: 132% from Rs. 3,087 crore (US\$ 421 million) to Rs. 7,224 crore (US\$ 984 million)
- Raw Cotton: 68% from Rs. 6,771 crore (US\$ 923 million) to Rs. 11,373 crore (US\$ 1,550 million)
- Sugar: 39.6% from Rs. 12,226 crore (US\$ 1,666 million) to Rs. 17,072 crore (US\$ 2,327 million)
- Spices: 11.5% from Rs. 23,562 crore (US\$ 3,211 million) to Rs. 26,257 crore (US\$ 3,578 million)
- The Agriculture Export Policy, 2018 aimed to increase India's agricultural export to Rs. 4,19,340 crore (US\$ 60 billion) by 2022. Government aims to raise fishery export from India to Rs. 1 lakh crore (US\$ 14.31 billion) by 2024-25.
- In 2021, India witnessed growth in agriculture product exports:
- In June 2021, India exported 24 metric tonnes of groundnuts to Nepal from West Bengal, boosting groundnut exports from Eastern India.
- In FY21, India exported 1.91 lakh tonnes of banana worth Rs. 619 crore (US\$ 82.90 million).
- According to Department for Promotion of Industry and Internal Trade (DPIIT), Indian food processing industry attracted Foreign Direct Investment (FDI) equity inflow of about US\$ 15.02 billion between April 2000 and November 2021.
- Gross Value Added by agriculture, forestry, and fishing was estimated at Rs. 19.48 lakh crore (US\$ 276.37 billion) in FY20. Share of agriculture and allied sectors in gross value added (GVA) of India at current prices stood at 17.8 % in FY20.
- The Ministry of Agriculture and Farmers Welfare's budget has been enhanced from Rs. 1.25 lakh crore (US\$ 16.20 billion) in 2020-21 to Rs. 1.32 lakh crore (US\$ 17.28 billion) in 2021-22.
- NABARD will assist the creation of a blended capital fund with a focus on the agricultural start-up ecosystem which will be used to fund agriculture and rural enterprise startups that are related to the farm product value chain.
- The government is promoting the use of drones in agriculture by providing financial assistance through the 'Sub-Mission on Agriculture Mechanization.'
- A network of 729 Krishi Vigyan Kendras has been established at the district level across the country to ensure that newer technologies such as improved variety seeds of crops, new breeds/ strains of livestock and fish, and improved production and protection technologies reach farmers.

- In October 2021, the Union Minister of Home Affairs launched the 'Dairy Sahakar' scheme in Anand, Gujarat.
- In September 2021, Prime Minister Mr. Narendra Modi launched 35 crop varieties with special traits such as climate resilience and higher nutrient content.
- The Electronic National Agriculture Market (e-NAM), launched in April 2016 to create a unified national market for agricultural commodities by networking existing Agriculture Produce Marketing Committees (APMCs), had 16.6 million farmers and 131,000 traders registered on its platform until May 2020. As per the Union Budget 2021-22, government announced that through e-NAM (National Agriculture Market), ~1.68 crore farmers were registered and trade worth Rs. 1.14 lakh crore (US\$ 15.63 billion) was carried out; 1,000 more mandis will be integrated to achieve transparency and bring competitiveness.

- The Government of India has introduced several projects to assist the agriculture sector. Pradhan Mantri Gram Sinchai Yojana (PMGSY) aims to irrigate the field of every farmer and improve water use efficiency to achieve the motto, 'Per Drop More Crop'. Overall, the scheme ensures improved access to irrigation. As per the Union Budget 2021-22, Rs. 11,588 crore (US\$ 1.5 billion) was allocated to Pradhan Mantri Krishi Sinchai Yojana (PMKSY). As per the Union Budget 2021-22, Rs. 1.33 lakh crore (US\$ 18.41 billion) was allocated to the Ministry of Agriculture. The Indian Prime Minister launched the Pradhan Mantri Kisan Samman Nidhi Yojana (PM-Kisan) and transferred Rs. 18,000 crore (US\$ 2.45 billion) to bank accounts of >90 million beneficiaries on December 25, 2020. As per the Union Budget 2021-22, Rs. 65,000 crore (US\$ 8.9 billion) was allocated to Pradhan



Mantri Kisan Samman Nidhi (PM-Kisan). As per the Union Budget 2021-22, Rs. 8,514 crore (US\$ 1.17 billion) was allocated to the Department of Agricultural Research and Education.

- Prime Minister of India launched the Pradhan Mantri Kisan Samman Nidhi Yojana (PM-Kisan) Benefits under the PM Kisan plan have been delivered to about 11.78 crore farmers as of February 22, 2022, and Rs. 1.82 lakh crore (US\$ 23.97 billion) have been released to qualified recipients across India in various payments.
- In April 2021, the Government of India approved a PLI scheme for the food processing sector with an incentive outlay of Rs 10,900 crore (US\$ 1,484 million) over a period of six years starting from FY22.
- To boost farmer incomes and growth of the agricultural economy, the Indian government released funds in June 2021 for farm mechanisation such as establishment of custom hiring centres, farm machinery bank and high-tech hubs in different states.
- In November 2020, Netafim India, a leading smart irrigation solutions provider, launched FlexNet, a revolutionary mainline and sub-mainline piping for above and below-ground drip irrigation systems for Indian farmers.
- In September 2020, the government launched the PM Matsya Sampada Yojana, e-Gopala App and several initiatives in fisheries production, dairy, animal husbandry and agriculture. Under this scheme, an investment of Rs. 20,000 crore (US\$ 2.7 billion) will be made in the next 4-5 years in 21 states.
- In June 2020, Government introduced Pradhan Mantri Formalization of Micro Food Processing Enterprises (PM-FME) scheme. It is expected to generate total investment of Rs. 35,000 crore (US\$ 4.97 billion), generate 9 lakh skilled and semi-skilled employment, and benefit 8 lakh units through access to information, training, better exposure, and formalization.

METAL INDUSTRY IN INDIA

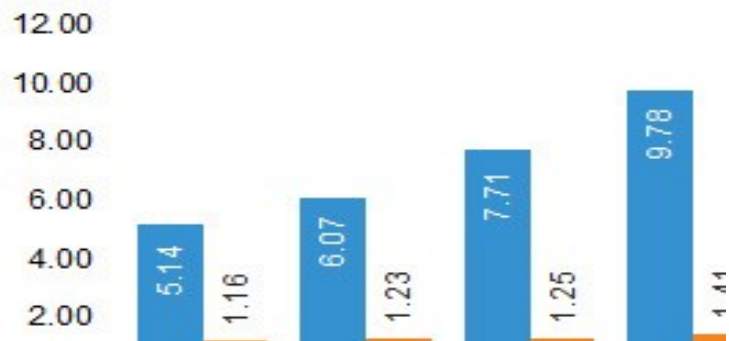
INTRODUCTION

India holds a fair advantage in production and conversion costs in steel and alumina. Its strategic location enables export opportunities to develop as well as fast-developing Asian markets.

As of FY21, the number of reporting mines in India were estimated at 1,229, of which reporting mines for metallic minerals were estimated at 545 and non-metallic minerals at 684.

Rise in infrastructure development and automotive production are driving growth. Power and cement industries are also aiding growth for the sector. Demand for iron and steel is set to continue given the strong growth expectations for the residential and commercial building industry.

Production of metallic and non-metallic m





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MARKET SIZE

Coal production in the country stood at 715.95 million tonnes (MT) in FY21. Between April 2021-October 2021, coal production in India stood at 379.597 million tonnes (MT).

India ranks fourth globally in terms of iron ore production. Production of iron ore in FY21 stood at 204.48 million tonnes. From April 2021-January 2022, iron ore production in India stood at 204 MT.

In FY20, India had a total number of 878 steel plants producing crude steel. In FY21, India's crude steel production stood at 103.54 million tonnes. According to worldsteel, crude steel output in India registered a 46.9% YoY growth to reach 9.2 million tonnes in May 2021, as compared with 5.8 million tonnes of crude steel output registered in May 2020. The steel production in India is projected to increase by 18% to reach 120 million tonnes (MT) by FY22. India's crude steel production stood at 102.49 million tonnes (MT) in FY21 and at 9.5 MT in September 2021.

In September 2021, production of hot metal, crude steel and saleable steel by SAIL stood at 1.55 MT, 1.44 MT and 1.46 MT, respectively.

Combined aluminium production (primary and secondary) in India stood at 4.1 MT in FY21, thereby becoming the 2nd largest in the world. Aluminium production stood at 3,285,186 tonnes between April 2020 and January 2021.

India is the world's second-largest coal producer as of 2021.

India is the world's second-largest crude steel producer, as of 2020, with an output of 99.6 MT.

INVESTMENTS/ DEVELOPMENTS

- In November 2021, JSW Steel announced that the company registered a 6% YoY surge in crude steel production at 1.42 million tonnes in October 2021.
- In November 2021, AMNS India announced that it is planning to manufacture specialty steel under the production-linked incentive (PLI) scheme.
- In September 2021, National Mineral Development Corporation Ltd. (NMDC) R&D Centre collaborated with CSIR-IMMT (Institute of Minerals and Materials Technology) to pursue combined research projects on iron ore mining technologies.
- Vedanta Limited is planning a US\$ 20 billion investments across its operations, including increase silver production and steel capacity.
- Epsilon Carbon, a coal tar derivatives company, has built India's first integrated carbon black complex in Bellary, Karnataka, with a Rs. 550-crore (US\$ 74.02 million) investment.
- In July 2021, India shipped its first coal export to Rampal Power Plant in Bangladesh, giving a boost to the country's coal exports.



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- According to official data, in the first quarter of FY22, iron ore exports reached US\$ 1.7 billion, registering an increase of 168% YoY.
- In July 2021, Power Mech Projects Ltd. secured a contract worth Rs. 9,294 crore (US\$ 1.25 billion) from Central Coalfields Ltd. (CCL) to build and operate a mine.
- In July 2021, Coal India Ltd. (CIL) signed a contract with Iz-Kartex, (a Russia-based shovel manufacturing firm) to purchase 11 Russian rope shovels worth ~Rs. 1,462 crore (US\$ 196.30 million).
- In June 2021, Mukand announced to expand its production and sales of stainless steel to 1.5 lakh tonnes per annum from 1 lakh tonnes at Thane (Mumbai) unit, which is expected to boost its turnover by ~Rs. 7,000 crore (US\$ 939.88 million) per annum.
- In June 2021, Mr. T.V. Narendran, the CII President and Managing Director of Tata Steel, stated that steel firms have firmed up plans to invest ~Rs. 60,000 crore (US\$ 8 billion) over the next three years in this sector.
- In May 2021, Vedanta Ltd. announced its plan to invest Rs. 10,000 crore (US\$ 1.34 billion) in setting up an aluminium park in Odisha to facilitate companies that use metal to set up their manufacturing units in the facility.
- In May 2021, ArcelorMittal Nippon Steel (AMNS) signed a contract with Total (a France-based energy company) for supply of up to 500,000 tons of liquefied natural gas (LNG) per year until 2026.
- In April 2021, Coal India Ltd. (CIL) announced the incorporation of two wholly owned subsidiaries –CIL Solar PV Ltd and CIL Navikarniya Urja Ltd.
- In March 2021, Coal India Ltd. (CIL) approved 32 new coal mining projects, of which 24 are expansion of the existing projects and the remaining are greenfield. Estimated cost of the project is Rs. 47,000 crore (US\$ 6.47 billion).
- In 2021, state-owned NMDC aims to utilise 97% production capacity to manufacture 35 MT of iron ore. In FY21 (until January 2021), NMDC's iron ore production stood MT.
- In February 2021, ArcelorMittal-Nippon Steel India, in agreement with the Odisha government, has planned to set up an integrated steel plant (with 12 MT capacity) in the state's Kendrapada district for Rs. 50,000 crore (US\$ 6.89 billion)
- In February 2021, two new iron ore mines were inaugurated in Odisha, with a production capacity of 15 lakh tonnes per month and ~275 million tonnes of consolidated iron ore reserves. These mines will bring in ~Rs. 5000 crore (US\$ 679.28 million) in annual revenue for the state and employment opportunities for locals.
- In February 2021, CIL signed a contract with Belaz, a Belarus-based mining equipment manufacturer, for procurement of dumpers with an investment amount worth Rs. 2,900 crore (US\$ 393.98 million).



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- In February 2021, CIL also announced plans to invest Rs. 1.43 lakh crore (US\$ 19.43 billion) in 20 projects, including solar, thermal and aluminium projects.

GOVERNMENT INITIATIVES

- The Ministry of Mines of the Government of India has signed MoUs with different nations.
- The Ministry of Mines notified the Mineral Conservation and Development (Amendment) Rules in November 2021 to provide rules regarding conservation of minerals, systematic and scientific mining, development of minerals in the country for environment protection.
- Steel Authority of India Ltd. (SAIL) and Central Public Sector Enterprises (CPSEs), under the Ministry of Steel, supplied 48,200 tonnes of steel for the Purvanchal Expressway, which was inaugurated by Prime Minister Narendra Modi on November 16, 2021.
- As part of unlocking India's vast mineral potential by exploration this year, the Ministry of Mines has handed over 152 mineral block reports to different state governments until November 2021. Also, 52 potential G-4 mineral blocks approved by the Geological Survey of India (GSI) have been handed over to 15 state governments.
- In September 2021, India and Australia participated in a joint working group (JWG) meeting on 'coal and mines' to strengthen bilateral collaboration in the coal sector.
- In September 2021, Union Cabinet approved the memorandum of understanding between the Geological Survey of India (GSI) and the Joint Stock Company Rosgeologia, Russia, in the area of geosciences.
- In July 2021, the Odisha government approved five key industrial projects worth Rs. 1.46 lakh crore (US\$ 19.60 billion) that are expected to boost capacity of steel production by 27.5 million tonnes.
- In June 2021, the Union Cabinet, chaired by the Prime Minister Mr. Narendra Modi approved the memorandum of understanding (MoU) to be signed between the Ministry of Mines and the Secretariat of Mining Policy of the Ministry of Productive Development of the Argentine Republic. The MoU will provide an institutional mechanism for cooperation in the field of mineral resources.
- In June 2021, Energy Efficiency Services Ltd (EESL) signed a memorandum of understanding (MoU) with MECON Ltd. to support energy efficiency in steel, mining industry.
- In April 2021, the directorate general of foreign trade (DGFT) notified that the import policy for copper and aluminium is amended from "free" to "free with compulsory registration" under the non-ferrous metal import monitoring system (NFMIMS). The policy is effective from April 12, 2021.
- To increase availability of iron ore in India, the government took several initiatives, such as 'Mining and Mineral Policy' reforms, to ramp up production and maximum capacity utilisation by government mining companies. For example, SAIL, with the approval to sell 25% fresh fines and 70 MT dumps and tailings, accelerated sale of iron ore.
- In Union Budget 2021, the government reduced customs duty to 7.5% on semis, flat and long products of non-alloy, alloy and stainless steels to provide relief to MSMEs.



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- To boost recycling of copper in India, the government announced reduction of import duty on copper scrap from 5% to 2.5% in the Union Budget 2021.
 - The National Steel Policy aims to boost per capita steel consumption to 160 kgs by 2030-31. The government has a fixed objective of increasing rural consumption of steel from the current 19.6 kgs per capita to 38 kgs per capita by 2030-31.

ROAD AHEAD

There is a significant scope for new mining capacities in iron ore, bauxite and coal and considerable opportunities for future discoveries of sub-surface deposits.

Infrastructure projects continue to provide lucrative business opportunities for steel, zinc, and aluminium producers.

Iron and steel make up a core component for the real estate sector. Demand for these metals is set to continue given strong growth expectations for the residential and commercial building industry.

(Source: www.ibef.org)



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OUR BUSINESS

Some of the information in this section, including information with respect to our plans and strategies, contain forward-looking statements that involve risks and uncertainties. Before deciding to invest in the Equity Shares, Shareholders should read this entire Draft Letter of Offer. An investment in the Equity Shares involves a high degree of risk. For a discussion of certain risks in connection with investment in the Equity Shares, you should read section titled “Risk Factors” on page 24, for a discussion of the risks and uncertainties related to those statements, as well as “Financial Statements” and “Management’s Discussion and Analysis of Financial Condition and Results of Operations” on pages 101 and 106, respectively, for a discussion of certain factors that may affect our business, financial condition or results of operations. Our actual results may differ materially from those expressed in or implied by these forward-looking statements. Unless otherwise stated, the financial information used in this section is derived from our Audited Standalone and Consolidated Financial Statements and Limited Review Standalone and Consolidated Financial Statements.

Overview

Akg Exim Limited is a diversified merchant trading company in vast range of products & commodities with quality management system. Our Company is a merchandiser, distributor of variety of products including Non Basmati Rice, Metal Scrap, Aluminium scrap, Iron Scrap, Spices and Dry Fruits, etc. Our Company connects the seller and the markets, while ensuring lasting prosperity and sustainable supply at both ends. Our Company is catering to a large number of customers with concentration on Indian and overseas subcontinent. With a steady expansion in the market, company is consistently aiming to achieve its mission of providing world class customer services.

Our Company was originally incorporated at New Delhi as “Akg Exim Private Limited” on 26th July, 2005 under the provisions of the Companies Act, 1956 vide Certificate of Incorporation issued by the Asst. Registrar of Companies, NCT of Delhi & Haryana. Consequent upon the conversion of our Company to public limited company, the name of our Company was changed to “Akg Exim Limited” vide fresh certificate of incorporation dated 17th January, 2018 issued by the Registrar of Companies, Delhi.

AKG Exim Ltd is networked across the global continents and countries to span our growth of trading business in diversified product portfolio classified primarily in following categories:

Import / Export of Ferrous and Non-Ferrous Metal Scrap:

- Heavy Melting Steel Scrap As per ISRI, (HMS 1 & 2);
- Light Melting Scrap (Bundles, Lose);
- Cast Iron, Auto Purja;
- Aluminium Scrap; &
- other type of scrap, etc.

Local Trading of Agro Food commodities:

- Base Oil (for refineries to further fraction in Industrial, Automobiles use);
- Other petroleum-based chemicals
- Rice, spices & Dry Fruits.
- Toluene (Chemical);

Our Company is accredited with Federation of Indian Export Organisations Certificate (FIEO) and has been designated for the Agricultural and Processed Food Products Export Development



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Authority Certificate (APEDA) and also registered with Food Safety and Standards Authority of India under License under Food Safety and Standards Act, 2006 as an Importer.

We have ventured in health and wellness vertical by endorsing as exclusive channel partner of Immunity bloom which are health and nutritional supplement experts to develop best quality health products based on plant science and pure plant extracts. These products are developed by Saveer Biotech Ltd with their past experience of 10 years involving research & innovation to create high quality nourishing dietary fibre supplements for building healthy and better India. Our company has launched a new E-commerce portal in the name of <https://www.akghealth.com/>. Our Company via this E Commerce platform is reselling the products related to health supplements.

Our Company has vast network, affiliations with reputed mills and good understanding of Indian market with their strong presence and relations.

Our Company has strong understanding and experience in Industrial supplies & equip to check all needed technical parameters in house with tech-equipped instruments and experienced quality analytical professionals.

Logistics and efficient supply chain management is key to the trading with reliable and efficient taskforce dedicated to manage competitive container and vessel loading cargoes at most competitive freight arrangements.

We are committed for due diligence for our commercial contracts with best efforts and commitment. We believe in long-term business goals with progressive vision and best relations.

We have two subsidiary Companies, namely.:

- M/s. BKS Metals Private Limited (BKS) is Subsidiary Company of the M/s AKG Exim Limited and company was incorporated in Delhi, India as on 01st September, 2020. BKS is engaged in diversified Manufacturing / Processing / Wholesaling in Ferrous and Non-Ferrous Metal Scraps. The Manufacturing Plant of the BKS is situated at Plot No. SP2-6(B), RIICO Industrial Area, Phase-I, Neemrana, Alwar 301705, Rajasthan.
- M/s. Asri Trade Pte. Ltd. (ASRI) a wholly owned subsidiary of M/s AKG Exim Limited and incorporated in Singapore as on 19th December, 2017. The registered office of ASRI is situated at 143 CECIL STREET #25-03 GB BUILDING SINGAPORE (069542). ASRI is a diversified trading company in vast range of products & commodities as a wholesaler of Ferrous & nonferrous Metal scrap, Lead Battery Scrap and Commissioning and indenting services in Singapore as well as with the rest of the world.

Our Company is being managed professionally. Our Company deploy the strategies to minimize the various risk associated with Business. Our Company obtains cash credit for its imports, Letter of Credit for its exports to minimize the credit risk and also enter into forward contracts from time to time to avoid the risk associated with the fluctuation of foreign exchange rates.

Vision :	Mission:
With our enormous sourcing strength and past enriched global experience of over a decade, we	We at AKG always believe "QUALITY IS THE KEY TO SUCCESS." We always deliver the desired



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always make the business profitable for our international associates by sourcing & trading the products from the trade beneficiary zones and areas to give the best cost advantages to our international business associates.

At AKG Exim, “QUEST FOR EXCELLENCE IS A NEVER ENDING PROCESS.”

quality products within the stipulated timeframe. With our strong customer focus, excellent human resources, backed by efficient and effective network of sourcing, we are poised to make great strides in the commodity trade and business.

Core Values:

- Excellent product knowledge
- Positive Attitude
- Ownership to deliver
- Team work & Co-ordination
- Customer & Supplier Focus

OUR KEY UNIQUE BUSINESS STRENGTHS ARE:

- 1) **Wide range of Products and hygienic:** We provide a broad range of products to our customers that currently, we are providing such products like Rice, different types of scrap, Spices, dry fruits etc. which increases the scope of our customers and our ability to cater to a diversified client base.
- 2) **Experienced Promoters and a well trained employee base** - Our promoters and management are experienced in our line of business. Our management and employee team combines expertise and experience to outline plans for the future development of the company. Since starting of operations, we have witnessed consistent and stable growth. Our Promoter has significant industry experience and has been instrumental in the consistent growth of our company. We believe that the knowledge and experience of our promoter and management will enable us to identify new opportunities, rapidly respond to market conditions, adapt to changes in the business landscape and competitive environment and enhance the growth in the business.
- 3) **Strong financial position** - We believe that our strong financial position will provide us with the financial flexibility to fund our growth and expansion and allow us to respond quickly and competitively to further capitalise on emerging opportunities in the market.
- 4) **Improving functional efficiency** - Our Company intends to improve operating efficiency to achieve cost reductions to have a competitive edge over the peers. We believe that this can be done through continuous process improvement, customer services.
- 5) **Established brand and image**- We are engaged in providing services to our clients and over the years, we believe that we have established ourselves as a reliable brand in India as well as outside India wherein our clients trust us for our quality, consistency and continuous performance.



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6) **Scalable Business Model:** Our Business model is a customer centric and order driven, and requires optimum utilization of our existing resources, assuring quality supply and achieving consequent economies of scale. The business scale generation is basically due to development of new markets and products both by exploring customer needs, marketing expertise and by maintaining the consistent quality output. We believe that our business model is scaleable.

OUR BUSINESS STRATEGIES:

1. **Expansion of Global Market:-** We intend to expand our geographical reach and enter the large market for growth opportunities of our business globally. We plan to deepen our presence in the existing market and expand our reach and penetrate into the large available market by giving scale down low price solution and grab major market share.
2. **Expanding product portfolio:-** Our Company is planning to direct its efforts towards expanding its product segment to serve end users. We also plan to add new products, and adding wide varieties for existing product range.
3. **Expanding our Clientele Base:-** Our Company is strategizing to strengthen its cliental base. Our present customer base comprises of a large number of Overseas & Indian Companies/concerns. Our Company intends to grow business continuously by adding new customers.
4. **Leveraging our Market skills and Relationships:-** This is a continuous process in our organization and the skills that we impart in our people give importance to customers. We aim to enhance the growth by leveraging our relationships and further enhancing customer satisfaction. We plan to increase our customers by meeting orders in hand on time, maintaining our customer relationship and renewing our relationship with existing buyers.
5. **Pursue strategic acquisitions:** In order to expand, we seek to identify acquisition targets and/or joint venture partners whose resources, capabilities, technologies and strategies are complementary to and are enabling us to establish our presence in new geographical locations.
6. **Improving operational efficiencies:** Improving operational efficiencies is the key to success of any business. Our Company intends to improve efficiencies to achieve cost reductions so that they can be competitive. We believe that this can be done through domestic presence and economies of scale. Increasing our penetration in existing regions will enable us to penetrate into new catchment areas within these regions. As a result of these measures, our Company will be able to increase its market share and profitability.





SWOT:

<p>Strengths:</p> <ul style="list-style-type: none"> • Cordial relations with Customers; • In depth knowledge of Industry - Commercial & Technical; • Experienced management team; • Global Presence. 	<p>Weaknesses:</p> <ul style="list-style-type: none"> • Dependent upon growth in industry; • Insufficient market reach; • Surge in finance needs to cope up with the increased demand; • Heavy dependence on suppliers for right quality of goods.
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Opportunities: <ul style="list-style-type: none">• Growing acceptance by consumers;• Opportunities in the International market;• Listing the company under a stock exchange will open up huge avenues of capital for the company to support its expansion plans and allows it to venture into new businesses.	Threats: <ul style="list-style-type: none">• Changes in government policies, material changes in the duty or may adversely impact our financials;• Prices and foreign Exchange price fluctuations;• There are no entry barriers in our industry which puts us to the threat of competition from new entrants;• Intense competitive pressure and Rising labor wages.
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Following are our Major products:

<i>RICE, SPICES, DRY FRUITS</i>	<i>METAL SCRAP</i>	
	<p data-bbox="779 461 957 488"><i>Ferrous Scrap</i></p> 	<p data-bbox="1409 461 1640 488"><i>Non Ferrous Scrap</i></p>  <p data-bbox="1556 854 1745 881"><i>Stainless Scrap</i></p> 



Petro Chemical and Oil



Healthcare Products

SHIELD-O_m ULTRA (Pure Korean Ginseng) 400mg



RAWCURIN





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OUR MANAGEMENT

Board of Directors

Currently, our Company has 6 (Six) Directors on our Board including two Women Directors, comprising of 2 (Two) Executive Directors, and 3 (Three) Independent Directors and 1 (One) Non Executive and Non Independent Director. The composition of the Board of Directors is governed by the provisions of the Companies Act and the SEBI Listing Regulations and the norms of the code of corporate governance as applicable to listed companies in India.

The Articles of Association provide that our Company shall not have less than three Directors and not more than 15 Directors.

Pursuant to the provisions of the Companies Act, 2013, at least two-third of the total number of Directors, excluding the Independent Directors, are liable to retire by rotation, with one-third of such number retiring at each Annual General Meeting. A retiring director is eligible for re-appointment. Further, an Independent Director may be appointed for a maximum of two consecutive terms of up to five years each.

The following table sets forth details regarding our Board of Directors as of the date of this Draft Letter of Offer.

Name, Father's name, Address, Occupation, Nationality, tenure & DIN	Date of Birth	Status of Directorship in our Company	Other Directorships
1. Mr. Rajeev Goel S/o Mr. Sita Ram Goel C-50, Suncity, Sector-54, Chakarpur - (74), Gurgaon-122002 Occupation: Business Nationality: Indian Tenure: Retire by rotation DIN: 01507297 PAN: AAJPG4108N	23.12.1974	Non Executive and Non Independent Director	Nil
2. Ms. Mahima Goel D/o Late Shri Suraj Parkash Singhal C-50, Suncity, Sector-54, Chakarpur - (74), Gurgaon-122002 Occupation: Business Nationality: Indian Tenure: Five Years DIN: 07167937 PAN: AHKPB1888Q	07.02.1977	Managing Director	1. Bks Metalics Pvt. Ltd. 2. Asri Trade Pte. Ltd.
3. Mr. Rahul Bajaj S/o Mr. Anil Bajaj C-12/126, 1st Floor, sector-5, Rohini,	29.10.1989	Executive and Non Independent	1. Licit Corporate Consultants LLP



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Name, Father's name, Address, Occupation, Nationality, tenure & DIN	Date of Birth	Status of Directorship in our Company	Other Directorships
New Delhi-110085 Occupation: Service Nationality: Indian Tenure: Retire by rotation DIN: 03408766 PAN: AOUPB5442B		Director	
4. Mr. Rakesh Mohan S/o Mr. Rajeshwar Nath K-6C, SFC Flats, 2, Saket, Delhi-110017 Occupation: Professional Nationality: Indian Tenure: Five years DIN: 07352915 PAN: AAAPM1773G	02.01.1952	Non Executive and Independent Director	1. Sunil Healthcare Limited 2. SKIL Infrastructure Limited 3. Gujarat - Dwarka Portwest Limited 4. Navi Mumbai Sez Private Limited 5. Orange Smart City Limited 6. Orange Smart City Infra-Projects Limited 7. Verona Capital Limited 8. Navi Mumbai Smart City Infrastructure Limited
5. Mr. Rao Laxman Singh S/o Mr. Harbans Singh Rao House No. 1029, Sec-17B, Gurgaon, Haryana, 122007 Occupation: Professional Nationality: Indian Tenure: Five years DIN: 08055192 PAN: AAJPY3453A	01.08.1957	Non Executive and Independent Director	1. Bks Metalics Private Limited 2. Singametal Ventures Pvt. Ltd. 3. Avyukta Dairy Products Limited
6. Mrs. Chetna S/o Mr. Krishan House no. 138, Rithala, North West Delhi- 110085 Occupation: Professional Nationality: Indian Tenure: Five years DIN: 08981045 PAN: AVEPC8499A	28.04.1990	Non Executive and Independent Director	1. Lotte Engineering and Construction India Private Limited 2. Esquire Money Guarantees Limited 3. Prosper Housing Finance Limited 4. Best Agrolife Limited 5. Sah Polymers Limited 6. Ang Lifesciences India Limited 7. Valecha Engineering Limited 8. Plaza Wires Limited



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Relationship between Directors

None of the Directors are related to each other as per the provisions of the Companies Act, 2013 except that Mrs. Mahima Goel is wife of Mr. Rajeev Goel.

Brief Profiles of Directors

Mr. Rajeev Goel, aged 47 years, is Promoter and Non-Executive Director of our Company. He is Bachelor of Technology (Electrical) from Delhi University and Diploma Course in Electrical Engineering. He is having more than 22 years of experience in the field of commodity, Metal Scrap business. He overview business activities of our Company. He has been on the Board of Company since July, 2005.

Mrs. Mahima Goel: aged 45 years, is Managing Director and wife of Mr. Rajeev Goel, Promoter of our Company. She is Bachelor of Education, Bachelor of Science, Master of Education and Master of Business Administration. She is having more than 19 years of Experience in Human Resource relationship. She looks after day-to-day routine operational activities of our Company. She has been on the board of Company since March, 2009.

Mr. Rahul Bajaj, aged 32 years, is Executive Director and Chief Financial officer of the Company. He has rich and varied exposure of 10 years in the field of Accounting, Taxation, Foreign Exchange and Secretarial Matters. He is a post graduate in MBA (Finance) from Delhi University. He looks financial and accounts of the Company. He has been on the board of Company since 2020.

Mr. Rakesh Mohan: aged 69 years, is Non Executive Director and Independent Director of the Company. He has completed B.Sc. (Hons) in Physics and M.Sc. in Physics from Delhi University. He joined MS Electrical Engineering from Ohio State University, USA as a Rotary scholar. He also did MS in Social Policy and Planning in Developing countries from London School of Economics. He is having more than 42 years of Experience in Public Works, Power sector, Education Sector. He has been on the board of Company since January, 2018.

Mr. Rao Laxman Singh: aged 64 years, is Non-Executive Director and Independent Director of the Company. He is Graduate from Kurukshetra University, M.A., LL.B., PGDM Business Administration and CAIIB Diploma in Cooperation and rural finance. He is having more than 32 years of experience in the field of Banking, Administration and liaisoning with various departments. He has been on the board of Company since January, 2018.

Ms. Chetna, aged 32 years, is Additional Non-Executive Independent Director of the Company. She is a Qualified Associate member of the Institute of Company Secretaries of India (ICSI), a Post Graduate in Management in Finance (MBA-Finance) from IGNOU, a Law Graduate from Jaipur College of Law and a Graduate in Commerce (B.Com.) from Delhi University. She got registration in Independent Director Data Bank under Indian Institute of Corporate Affairs (IICA) having registration no. IDDB-PA-202012-032734. She has more than 4 years of experience in the field of Corporate Laws, Securities Law, SEBI Compliances, Financial Management, Accounts and Taxation etc. in Listed Companies, Public and Private Companies. She has been on the Board of Company since April, 2022.

Details of any arrangement or understanding with major shareholders, customers, suppliers or others

Our Company has not entered into any arrangement or understanding with major shareholders,



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customers, suppliers or others, pursuant to which any of the above mentioned Directors have been appointed in the Board.

Other Confirmations:

1. None of Directors are currently, or have been in the past five years, on the board of directors of a listed company whose shares have been or were suspended from being traded on the Stock Exchange.
2. None of our Directors is or was, in the past ten years, a director of any listed company which has been or was delisted from any stock exchange in India during the term of their directorship in such company.

CORPORATE GOVERNANCE

Our Company stands committed to good corporate governance practices based on the principles such as accountability, transparency in dealings with our stakeholders, emphasis on communication and transparent reporting.

We have a Board constituted the Board Committees in compliance with the Companies Act. The Board functions either as a full Board or through various committees constituted to oversee specific operational areas. Our executive management provides the Board detailed reports on its performance periodically.

Currently, our Company has 6 (Six) Directors on our Board including women Director, comprising of 2 (Two) Executive Directors, and 3 (Three) Independent Directors and 1 (One) Non Executive and Non Independent Director.

The following committees have been formed in compliance with the corporate governance norms:

- A) Audit Committee
- B) Stakeholders Relationship Committee
- C) Nomination and Remuneration Committee

AUDIT COMMITTEE

Our Company has constituted an audit committee ("Audit Committee"), as per the provisions of Section 177 of the Companies Act, 2013 and regulation 18 of SEBI LODR Regulations.

The terms of reference of Audit Committee complies with the requirements of Companies Act, 2013 and regulation 18 of SEBI LODR Regulations. The committee presently comprises following three (3) directors. Mr. Rakesh Mohan is the Chairman of the Audit Committee.

Sr. No.	Name of the Director	Status	Nature of Directorship
1.	Mr. Rakesh Mohan	Chairman	Independent Director
2.	Mr. Rao Laxman Singh	Member	Independent Director
3.	Mrs. Mahima Goel	Member	Managing Director



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Role of Audit Committee

The terms of reference of the Audit Committee are given below:

1. To investigate any activity within its terms of reference.
2. To seek information from any employee.
3. To obtain outside legal or other professional advice.
4. To secure attendance of outsiders with relevant expertise, if it considers necessary.
5. Oversight of the company's financial reporting process and the disclosure of its financial information to ensure that the financial statement is correct, sufficient and credible.
6. Recommending to the Board, the appointment, re-appointment and, if required, the replacement or removal of the statutory auditor and the fixation of audit fees.
7. Approval of payment to statutory auditors for any other services rendered by the statutory auditors.
8. Reviewing, with the management, the annual financial statements before submission to the board for approval, with particular reference to:
 - a. Matters required to be included in the Director's Responsibility Statement to be included in the Board's report in terms of clause (c) of sub section (3) of section 134 of the Companies Act, 2013.
 - b. Changes, if any, in accounting policies and practices and reasons for the same
 - c. Major accounting entries involving estimates based on the exercise of judgment by management
 - d. Significant adjustments made in the financial statements arising out of audit findings
 - e. Compliance with listing and other legal requirements relating to financial statements
 - f. Disclosure of any related party transactions
 - g. Qualifications in the draft audit report.
9. Reviewing, with the management, the quarterly financial statements before submission to the board for approval
10. Reviewing, with the management, the statement of uses / application of funds raised through an issue (public issue, rights issue, preferential issue, etc.), the statement of funds utilized for purposes other than those stated in the offer document/prospectus/notice and the report submitted by the monitoring agency monitoring the utilisation of proceeds of a public or rights issue, and making appropriate recommendations to the Board to take up steps in this matter.
11. Reviewing, with the management, performance of statutory and internal auditors, and adequacy of the internal control systems.
12. Reviewing the adequacy of internal audit function, if any, including the structure of the internal audit department, staffing and seniority of the official heading the department, reporting structure coverage and frequency of internal audit.



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13. Discussion with internal auditors any significant findings and follow up there on.
14. Reviewing the findings of any internal investigations by the internal auditors into matters where there is suspected fraud or irregularity or a failure of internal control systems of a material nature and reporting the matter to the board.
15. Discussion with statutory auditors before the audit commences, about the nature and scope of audit as well as post-audit discussion to ascertain any area of concern.
16. To look into the reasons for substantial defaults in the payment to the depositors, debenture holders, shareholders (in case of non payment of declared dividends) and creditors.
17. To review the functioning of the Whistle Blower mechanism, in case the same is existing.
18. Approval of appointment of CFO (i.e., the whole-time Finance Director or any other person heading the finance function or discharging that function) after assessing the qualifications, experience & background, etc. of the candidate.
19. Carrying out any other function as is mentioned in the terms of reference of the Audit Committee.
20. Mandatorily reviews the following information:
 - a. Management discussion and analysis of financial condition and results of operations;
 - b. Statement of significant related party transactions (as defined by the audit committee), submitted by management;
 - c. Management letters / letters of internal control weaknesses issued by the statutory auditors;
 - d. Internal audit reports relating to internal control weaknesses; and
 - e. The appointment, removal and terms of remuneration of the Chief internal auditor shall be subject to review by the Audit Committee
21. Review the Financial Statements of its subsidiary company, if any.
22. Review the composition of the Board of Directors of its Subsidiary Company, if any.
23. Review the Vigil mechanism (whistle blowing) policy.
24. Review the use/application of funds raised through an issue (public issues, right issues, preferential issues etc) on a quarterly basis as a part of the quarterly declaration of financial results. Further, review on annual basis statements prepared by the Company for funds utilized for purposes other than those stated in the offer document.

In addition, to carry out such other functions/powers as may be delegated by the Board to the Committee from time to time.

STAKEHOLDERS RELATIONSHIP COMMITTEE

Our Company has constituted a Stakeholders Relationship Committee ("**Stakeholders relationship committee**") to redress the complaints of the shareholders in terms of section 178 (3) of Companies Act, 2013 and regulation 19 of SEBI LODR Regulations. The committee currently comprises of three (3) Directors. Mr. Rakesh Mohan is the Chairman of the Stakeholders relationship Committee.

Sr. No.	Name of the Director	Status	Nature of Directorship
1.	Mr. Rakesh Mohan	Chairman	Independent Director
2.	Mr. Rao Laxman Singh	Member	Independent Director
3.	Mr. Rajeev Goel	Member	Non Executive and Non Independent Director



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Role of stakeholder Relationship committee

The Stakeholder Relationship Committee of our Board look into:

- The redressal of investors complaints viz. non-receipt of annual report, dividend payments etc.
- Matters related to share transfer, issue of duplicate share certificate, dematerializations.
- Also delegates powers to the executives of our Company to process transfers etc.

The status on various complaints received / replied is reported to the Board of Directors as an Agenda item.

NOMINATION AND REMUNERATION COMMITTEE

Our Company has constituted a Nomination and Remuneration Committee ("Nomination and Remuneration Committee") in terms of section 178 (3) of Companies Act, 2013 and regulation 19 of SEBI LODR Regulations. The Committee currently comprises of three (3) Directors. Mr. Rakesh Mohan is the Chairman of the Nomination and Remuneration Committee.

Sr. No.	Name of the Director	Status	Nature of Directorship
1.	Mr. Rakesh Mohan	Chairman	Independent Director
2.	Mr. Rao Laxman Singh	Member	Independent Director
3.	Mr. Rajeev Goel	Member	Non Executive and Non Independent Director

The Company Secretary of our Company shall act as the Secretary to the Nomination and Remuneration Committee.

The terms of reference of the Nomination and Remuneration Committee are as follows:

- The Nomination and Remuneration committee recommends to the board the compensation terms of the executive Directors.
- The committee to carry out evolution of every director's performance and recommend to the board his/her appointment and removal based on the performance.
- The committee to identify persons who may be appointed in senior management in accordance with the criteria laid down.
- Framing and implementing on behalf of the Board and on behalf of the shareholders, a credible and transparent policy on remuneration of executive directors including ESOP, Pension Rights and any compensation payment.
- Considering approving and recommending to the Board the changes in designation and increase in salary of the executive directors.
- Ensuring the remuneration policy is good enough to attract, retain and motivate directors.
- Bringing about objectivity in deeming the remuneration package while striking a balance between the interest of the Company and the shareholders.


Our Key Management Personnel and Senior Management Personnel

S.No.	Name of key Management Personnel and Senior Management Personnel	Designation	Associated with the Company Since
1.	Mrs. Mahima Goel	Managing Director	26.03.2009
2.	Mr. Rahul Bajaj	Chief Financial Officer	24.01.2020
3.	Ms. Mahak	Company Secretary	03.02.2022

Relationship of Key Managerial Personnel with our Directors, Promoter and / or other Key Managerial Personnel

There is no relationship between Key managerial personnel with Our Directors, Promoters and/ or Other Key Managerial personnel except that Mrs. Mahima Goel, Managing Director is wife of Mr. Rajeev Goel, Promoter of the Company.



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SECTION VI - FINANCIAL INFORMATION

FINANCIAL STATEMENTS

Particulars	Page No.
Audited Standalone and Consolidated Financial Statements for the financial year ended on March 31, 2021	F1 to F72
Limited Review Report and Unaudited Standalone and Consolidated Financial Statements for the Nine months ended on December 31, 2021	F73 to F84
Statement of Accounting Ratios	102

Material changes and commitments, if any, affecting our financial position

There are no material changes and commitments, which are likely to affect our financial position since March 31, 2021 till date of this Draft Letter of Offer. We have not given Restated Financials because we fall under Part-B of SEBI (ICDR), 2018. We have approved and filed the limited review financial results for the quarter and Nine (9) months ended December 31, 2021 with the Stock Exchange. For the limited review financial results for the quarter and Nine (9) months ended December 31, 2021, please see section "Financial Information" on page 101.

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Independent Auditor's Report

To the Members of AKG Exim Limited

Report on the Audit of the Standalone Financial Statements Opinion

Opinion

We have audited the accompanying financial statements of AKG Exim Limited ("the company"), which comprise the Balance Sheet as at March 31, 2021, the Statement of Profit and Loss, the Cash Flow Statement for the year then ended, and a summary of significant accounting policies and other explanatory information (hereinafter referred to as the "standalone financial statements").

In our opinion and to the best of our information and according to the explanations given to us, the aforesaid financial statements give the information required by the Act in the manner so required and give a true and fair view in conformity with the accounting principles generally accepted in India of the state of affairs of the Company as at March 31, 2021, its Profit and its cash flows for the year ended on that date.

Basis for Opinion

We conducted our audit in accordance with the Standards on Auditing (SAs) specified under section 143(10) of the Companies Act, 2013. Our responsibilities under those Standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are independent of the Company in accordance with the Code of Ethics issued by the Institute of Chartered Accountants of India together with the ethical requirements that are relevant to our audit of the financial statements under the provisions of the Companies Act, 2013 and the Rules 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 opinion.

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

The Company's Board of Directors and Management is responsible for the preparation of the other information. The other information comprises the information obtained at the date of this auditor's report, but does not include the financial statements and our auditor's report thereon.

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

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



Responsibility of Management and Those Charged With Governance for the Financial Statements

The Company's Board of Directors is responsible for the matters stated in section 134(5) of the Companies Act, 2013 ("the Act") with respect to the preparation and presentation of these financial statements that give a true and fair view of the financial position, financial performance and cash flows of the Company in accordance with the accounting principles generally accepted in India, including the Accounting Standards specified under Section 133 of the Act. This responsibility also includes the maintenance of adequate accounting records in accordance with the provision of the Act for safeguarding of the assets of the Company and for preventing and detecting the frauds and other irregularities; selection and application of appropriate accounting policies; making judgments and estimates that are reasonable and prudent; and design, implementation and maintenance of adequate internal financial control, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the financial statements that give a true and fair view and are free from material misstatement, whether due to fraud or error.

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

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

Auditor's Responsibility

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

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

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances. Under section 143(3)(i) of the Companies Act, 2013, we are also responsible for expressing our opinion on whether the company has adequate internal financial controls system in place and the operating effectiveness of such controls.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.



- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

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

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

- 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;
- 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;
- The Balance Sheet, the Statement of Profit & Loss & Cash Flow Statement dealt with by this report are in agreement with the books of accounts;
- In our opinion, the aforesaid consolidated financial statements comply with the Accounting Standards specified under Section 133 of the Act.

The Company migrated from SME Platform to the Main Board platform of NSE Ltd w.e.f. February 16, 2021 and hence based relevant provisions of Ind AS and Press Release issued by the Ministry of Corporate Affairs, dated January 2, 2015, the Company has to follow Companies (Indian Accounting Standards) Rules, 2015 [Ind-AS Rules] for the first time from the subsequent Financial Year i.e FY 2021-22.

- On the basis of written representations received from the directors as on March 31, 2021 and taken on record by the Board of Directors, we report that none of the director is disqualified as on March 31, 2021 from being appointed as a director in terms of Section 164 (2) the Act;
- With respect to the adequacy of the internal financial controls over financial reporting of the Company and the operating effectiveness of such controls, refer to our separate Report in "Annexure A". Our report expresses an unmodified opinion on the adequacy and operating effectiveness of the Company's internal financial controls over financial reporting.
- 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.
- 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:
 - The Company has disclosed the impact of pending litigations on its financial position in its standalone financial statements.



- b. The Company has made provision, as required under the applicable law or accounting standards, for material foreseeable losses, if any, on long-term contracts including derivative contracts;

As required by the Companies (Auditor's Report) Order, 2016 ("the Order") issued by the Central Government in terms of Section 143(11) of the Act, we give in "Annexure B" a statement on the matters specified in paragraphs 3 and 4 of the Order.

For SharmaSharma & Co.
Chartered Accountants
FRN: 0009462N



Place:-New Delhi
Date: June 29, 2021
UDIN: 21088272AAAADW7694

Suvir Sharma
(Partner)
Membership No. 088272

ANNEXURE “A” TO THE INDEPENDENT AUDITOR’S REPORT

(Referred to in paragraph 1 (f) under ‘Report on Other Legal and Regulatory Requirements’

section of our report to the Members of AKG Exim Limited of even date)

Report on the Internal Financial Controls Over Financial Reporting under Clause (i) of Subsection 3 of Section 143 of the Companies Act, 2013 (“the Act”)

We have audited the internal financial controls over financial reporting of AKG Exim Limited (the “Company”) as of March 31, 2021 in conjunction with our audit of the standalone financial statements of the Company for the year ended on that date.

Management’s Responsibility for Internal Financial Controls

The Management of the Company 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 (the “ICAI”). These responsibilities include the design, implementation and maintenance of adequate internal financial controls that were operating effectively for ensuring the orderly and efficient conduct of its business, including adherence to company’s policies, the safeguarding of its assets, the prevention and detection of frauds and errors, the accuracy and completeness of the accounting records, and the timely preparation of reliable financial information, as required under the Companies Act, 2013.

Auditor’s Responsibility

Our responsibility is to express an opinion on the Company's internal financial controls over financial reporting of the Company 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”) issued by the ICAI and the Standards on Auditing prescribed under Section 143(10) of the Companies Act, 2013, to the extent applicable to an audit of internal financial controls. 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 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 Company’s internal financial controls system over financial reporting.



Meaning of Internal Financial Controls Over Financial Reporting

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

Inherent Limitations of Internal Financial Controls over Financial Reporting

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

Opinion

In our opinion, to the best of our information and according to the explanations given to us, 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, 2021, based on the criteria for internal financial control over financial reporting 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 ICAI.

**For SharmaSharma & Co.
Chartered Accountants
FRN: 0009462N**



**Suvir Sharma
(Partner)
Membership No. 088272**

**Place:-New Delhi
Date: June 29, 2021
UDIN: 21088272AAAADW7694**

ANNEXURE 'B' TO THE INDEPENDENT AUDITOR'S REPORT

(Referred to in paragraph 2 under 'Report on Other Legal and Regulatory Requirements' section of our report to the Members of Infosys Limited of even date)

- I. In respect of the Company's fixed assets:
 - a. The Company has maintained proper records showing full particulars, including quantitative details and situation of fixed assets
 - b. The Company has a program of verification to cover all the items of fixed assets in a phased manner which, in our opinion, is reasonable having regard to the size of the Company and the nature of its assets. Pursuant to the program, certain fixed assets were physically verified by the management during the year. According to the information and explanations given to us, no material discrepancies were noticed on such verification.
 - c. According to the information and explanations given to us, the records examined by us and based on the examination of the conveyance deeds / registered sale deed provided to us, we report that, the title deeds, comprising all the immovable properties of land and buildings which are freehold, are held in the name of the Company as at the balance sheet date.
- II. In respect of the Company's inventory:
 - a. As explained to us, the inventories of Finished Goods and Stores & Consumables were physically verified at regular intervals by the Management.
 - b. In our opinion and according to the information and explanation given to us, the procedures of physical verification of inventories followed by the Management were reasonable and adequate in relation to the size of the Company and the nature of its business.
 - c. In our opinion and according to the information and explanations given to us, the Company has maintained proper records of its inventories and no material discrepancies were noticed on physical verification of stocks as compared to book records.
- III. The Company has not granted unsecured loans to companies, firms or other parties covered in the Register maintained under Section 189 of the Companies Act, 2013. Therefore paragraph 3 (iii) of the order is not applicable
- IV. In respect of loans, investments, guarantees and security, the provisions of section 185 and 186 of the Companies Act have been complied with.
- V. The company has not received any public deposits during the year.
- VI. The maintenance of cost records has not been specified by the Central Government under section 148(1) of the Companies Act, 2013 for the business activities carried out by the Company. Thus reporting under clause 3(vi) of the order is not applicable to the Company.
- VII. According to the information and explanations given to us, in respect of statutory dues:
 - a. The Company has generally been regular in depositing undisputed statutory dues, including Provident Fund, Employees' State Insurance, Income Tax, Goods and Service Tax, Customs Duty, Cess and other material statutory dues applicable to it with the appropriate authorities.
 - b. There were no undisputed amounts payable in respect of Provident Fund, Employees' State Insurance, Income Tax, Goods and Service Tax, Customs Duty, Cess and other material statutory dues in arrears as at March 31, 2021 for a period of more than six months from the date they became payable.
 - c. There were no dues of Income Tax, Sales Tax, Service Tax, Excise Duty, Value Added Tax and Goods and Service Tax which have not been deposited as at March 31, 2021 on account of dispute.
- VIII. The Company has not made any defaults in repayment of loans to banks, government, debenture-holders, etc. then the amount and period of default.
- IX. The Company has not raised moneys by way of initial public offer or further public offer (including debt instruments) or term loans and hence reporting under clause 3 (ix) of the Order is not applicable to the Company.



- X. To the best of our knowledge and according to the information and explanations given to us, no fraud by the Company or no material fraud on the Company by its officers or employees has been noticed or reported during the year.
- XI. In our opinion and according to the information and explanations given to us, the Company has paid/provided managerial remuneration in accordance with the requisite approvals mandated by the provisions of section 197 read with Schedule V to the Act
- XII. The Company is not a Nidhi Company and hence reporting under clause 3 (xii) of the Order is not applicable to the Company.
- XIII. In our opinion and according to the information and explanations given to us, the Company is in compliance with Section 177 and 188 of the Companies Act, 2013 where applicable, for all transactions with the related parties and the details of related party transactions have been disclosed in the standalone financial statements as required by the applicable accounting standards.
- XIV. During the year, the Company has not made any preferential allotment or private placement of shares or fully or partly paid convertible debentures and hence reporting under clause 3 (xiv) of the Order is not applicable to the Company.
- XV. In our opinion and according to the information and explanations given to us, during the year the Company has not entered into any non-cash transactions with its Directors or persons connected to its 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.

**For SharmaSharma & Co.
Chartered Accountants
FRN: 0009462N**



**Suvir Sharma
(Partner)
Membership No. 088272**

**Place:-New Delhi
Date: June 29, 2021
UDIN: 21088272AAAADW7694**

AKG EXIM LIMITED
CIN: L00063DL2005PLC139045
Standalone Balance Sheet as at 31 March, 2021

(Rs. In Lakhs)

Particulars	Notes	As at 31st March 2021	As at 31st March 2020	As at 1st April 2019
Assets				
Non-current Assets				
Property, plant and equipment	2	69.48	87.08	860.49
Other Intangible Assets		-	-	-
Financial Assets				
Investments	3	52.55	-	-
Other Financial Assets	4	4.61	3.71	15.82
Other Non-Current Assets	5	15.15	22.92	38.07
Total Non Current Assets		141.79	113.71	914.38
Current Assets				
Inventories	6	313.95	304.64	1,089.50
Financial Assets				
Investments		-	-	-
Trade receivables	7	2,309.99	1,720.07	3,110.99
Loans	8	58.85	-	-
Cash and cash equivalent	9	1.85	336.82	279.16
Other Bank Balances		-	-	-
Other Financial Assets	10	88.67	17.68	34.23
Current Tax Assets (Net)		-	-	-
Other Current Assets	11	533.68	648.48	536.53
Total Current Assets		3,306.99	3,027.69	5,050.41
Total Assets		3,448.78	3,141.39	5,964.78
Equity and Liabilities				
Equity				
Equity Share Capital	12	1,059.22	662.01	662.01
Other Equity	13	1,016.81	1,307.07	1,198.52
Total Equity		2,076.03	1,969.08	1,860.53
Non-current Liabilities				
Financial Liabilities				
a) Borrowings	14	33.57	43.81	69.82
Deferred Tax Liabilities (net)	15	29.64	29.22	22.44
Other-Non-current Liabilities		-	-	-
Total Non Current Liabilities		63.21	73.03	92.27
Current Liabilities				
Financial Liabilities				
Borrowings	16	921.48	951.79	2,864.94
Trade payables-	17	-	-	-
Total Outstanding dues of micro enterprises and small enterprises		-	-	-
Total Outstanding dues of creditors other than micro enterprises and small enterprises		288.68	93.19	570.31
Other-Financial Liabilities	18	48.80	16.08	2.53
Other Current Liabilities	19	1.58	0.65	529.06
Provisions	20	11.28	1.47	14.43
Current Tax Liabilities (net)	21	37.72	36.10	30.72
Total Current Liabilities		1,309.55	1,099.28	4,011.99
Total Equity and Liabilities		3,448.78	3,141.39	5,964.78

Statement of significant accounting policies

1

The accompanying notes are integral part of the financial statements.

As per our report of even date

For Sharma Sharma & Co.

Chartered Accountants

F.R.N.: 009462N

CA Suvir Sharma

Partner

M.No.: 088272

UDIN: 21088272AAAADW7694

Date: 29-06-2021

Place : Gurugram



For AKG EXIM LIMITED

Managing Director

Mahima Goel
(Managing Director)
DIN: 02205003

For AKG EXIM LIMITED

For and on behalf of the Board of Directors

AKG Exim Limited

Rahul Bajaj

(Executive Director & CFO)

DIN: 03408766

Pragati Parnika

Company Secretary

Membership No. A58202

C.F.O.

AKG EXIM LIMITED
CIN: L00063DL2005PLC139045
Standalone Statement of Profit and Loss for the year ended 31 March, 2021

(Rs. In Lakhs)

Particulars	Notes	Year Ended 31st March-2021	Year Ended 31st March-2020
INCOME			
Revenue from operations	22	7,751.67	6,637.65
Other income	23	19.72	322.78
Total Income (I)		7,771.39	6,960.43
EXPENSES			
Cost of Materials Consumed		-	-
Purchases of Stock in Trade	24	7,245.26	5,192.14
Changes in inventories of finished good & work-inprogress	25	(9.31)	784.86
Employee benefits expenses	26	56.15	93.33
Finance costs	27	89.30	131.38
Depreciation and amortization expens	2	17.46	57.60
Other expenses	28	227.44	549.70
Total expenses (II)		7,626.29	6,809.00
Profit/(loss) before tax (III) = (I-II)		145.09	151.43
Tax expense			
(1) Current tax	30		
Current Year		37.72	36.10
Earlier years		-	-
(2) Deferred tax		0.42	6.78
(3) Mat Credit Entitlement		-	-
Total Tax Expenses (IV)		38.14	42.88
Profit After Tax (V) = (III)-(IV)		106.95	108.55
Other Comprehensive Income			
Items that will not be reclassified to profit & loss			
a) Remeasurement of defined benefit obligations		-	-
Income tax relating to these items		-	-
b) Change in fair value of investment in equities carried at fair value through OCI		-	-
Income tax relating to these items		-	-
Other Comprehensive Income for the year, net of tax (VI)		-	-
Total Comprehensive Income for the year (VII) = (V+VI)		106.95	108.55
Earnings per share			
Weighted average number of Ordinary Shares outstanding during the year		1,05,92,192	66,20,120
Basic		1.01	1.64
Diluted		1.01	1.64

Statement of significant accounting policies

1

The accompanying notes are integral part of the financial statements.

As per our report of even date
For Sharma Sharma & Co.
Chartered Accountants
F.R.N.: 009462N

CA Suvir Sharma
Partner
M.No.: 088272
UDIN: 21088772AAAADW7694



Date: 29-06-2021
Place: Gurugram

For AKG EXIM LIMITED

Mahima Goel
Managing Director
Mahima Goel
(Managing Director)
DIN: 0220500

For and on behalf of the Board of Directors
AKG Exim Limited

For AKG EXIM LIMITED

Rahul Bajaj
C.F.O.
Rahul Bajaj
(Executive Director & CFO)
DIN: 03408766

Pragati Parnian
Pragati Parnian
Company Secretary
Membership No. A58202

AKG EXIM LIMITED
CIN: L00063DL2005PLC139045
Standalone Statement Of Cashflow for the year ended 31 March, 2021

(Rs. In Lakhs)

Particulars	As at 31st March, 2021	As at 31st March 2020
A. CASH FLOW FROM OPERATING ACTIVITY		
Net Profit Before Tax as per Statement of Profit and Loss	145.09	151.43
Adjustments to reconcile profit before tax to net cash flows:		
Depreciation and impairment of property, plant and equipment	17.46	57.60
Preliminary Expenses W/o	7.77	7.77
Net Gain/Loss on disposal of property, plant and equipment	-	(274.09)
Interest income	(1.79)	(32.43)
Finance costs	89.30	131.38
PPE written off	0.16	4.06
Provision for doubtful debts, advances, deposits and others	-	-
Cash generated from operations before working capital changes	257.98	45.71
Working capital adjustments:		
Increase/decrease in trade receivables	(589.91)	1,390.92
Increase/decrease in non current financial assets	(0.90)	12.10
Increase/decrease in loan	(58.85)	-
Increase/decrease in non current assets	-	7.38
Increase/decrease in Investment	(52.55)	-
Increase/decrease in other current financial assets	(70.99)	16.55
Increase/decrease in other current assets	114.79	(111.94)
Increase/decrease in inventory	(9.31)	784.86
Increase/decrease in other current financial liabilities	32.72	13.55
Increase/ decrease in other current liabilities	0.93	(528.41)
Increase/decrease in trade payables	195.49	(477.12)
Increase/decrease in non current liabilities	-	-
Increase/decrease in current provisions	9.80	(12.96)
Cash generated from operation	(170.79)	1,140.65
Income tax paid	(36.10)	(30.72)
Net cash flows from operating activities (A)	(206.89)	1,109.93
B. CASH FLOW FROM INVESTING ACTIVITY		
Proceeds from sale of property, plant and equipment	-	1,006.84
Purchase of property, plant and equipment	(0.02)	(21.00)
Purchase of non current investment	-	-
Purchase/Sale of current investment	-	-
Interest received	1.79	32.43
Net cash flows used in investing activities (B)	1.77	1,018.27
C. CASH FLOW FROM FINANCING ACTIVITY		
Proceeds from Issue of Share Capital	397.21	-
Share premium	(397.21)	-
Proceeds from / (Repayment of) Short Term Borrowings/long term borrowing	(40.55)	(1,939.17)
Interest Paid	(89.30)	(131.38)
Net cash flows from/(used in) financing activities (C)	(129.85)	(2,070.54)
Net increase in cash and cash equivalents(A+B+C)	(334.97)	57.66
Cash and cash equivalents at the beginning of the year	336.82	279.16
Cash and cash equivalents at year end	1.85	336.82

Notes:

(i) The above Statement of Cash Flows has been prepared under the 'Indirect Method' as set out in Ind AS 7, 'Statement of Cash Flows'.

(ii) Previous year figures have been regrouped / rearranged to make them comparable, wherever considered necessary, with those of the current year.

For AKG EXIM LIMITED

For AKG EXIM LIMITED

As per our report of even date
For Sharma Sharma & Co.
Chartered Accountants
F.R.N.: 00946214

CA Suvir Sharma
Partner
M.No.: 088272
Place : Gurugram
Date: 29-06-2021



For and on behalf of the Board of Directors
Managing Director
Mahima Goel
(Managing Director)
DIN: 02205603
Company Secretary
Pragati Parnika
Membership No. A58202

C.F.O.
Rahul Bajaj
(Executive Director & CFO)
DIN: 03408766

AKG EXIM LIMITED

CIN: L00063DL2005PLC139045

Notes to Standalone financial statements for the year ended 31st March, 2021

Note No. 1: - STATEMENT OF SIGNIFICANT ACCOUNTING POLICIES

1 Corporate Information

AKG Exim Limited is a Public listed company domiciled in India and incorporated under the provisions of the Companies Act, 1956 / Companies Act, 2013. The Company is engaged in the business of Import / Export, Trading of Metals Scrap, Rice, Spices & Dry Fruits. These financial statements have been approved by way of resolution passed by Board of Directors on 29th June 2021.

2 Basis of preparation

A Statement of Compliance

Company has adopted Indian accounting Standard (Referred to as "IND AS") as notified by Companies (Indian Accounting Standards) Rules 2015 read with Section 133 of the Companies Act, 2013 with effect from 1 April 2020. Previous period has been restated as per Ind AS. In accordance with Ind AS 101 "First Time Adoption of Indian Accounting Standard", the company has presented a reconciliation from the presentation of financial statement under Accounting Standard notified under the Company (Accounting Standard) Rules, 2006 (Previous GAAP) to Ind AS of Shareholders Equity as at 31st March 2020 and April 1, 2019. For all periods up to and including for the year ended 31 March 2021, the company's financial statements prepared complying in all material respects with the accounting standards notified under Section 133 of the Company Act 2013, read together with paragraph 7 of the Companies (Accounts) Rules, 2014.

B Basis of measurement

The financial statements are prepared on Historical Cost basis except for certain financial assets and liabilities that are measured at fair value (Refer accounting policy regarding Financial Instruments). The accounting policies not specifically referred to otherwise, are consistent and in consonance with generally accepted accounting principles. All income and expenditure are being accounted for on accrual basis.

Historical cost is generally based on the fair value of the consideration given in exchange for goods and services.

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

C Functional and Presentation currency

These financial statements are presented in Indian Rupees (INR), which is the Company's functional currency. All financial information presented in INR has been rounded to the nearest lakhs (upto two decimals), except as stated otherwise.

D Use of Estimates

In preparing Company's financial statements in conformity with accounting principles generally accepted in India, management is required to make estimates and assumptions that affect the reported amount of assets and liabilities and the disclosure of contingent liabilities at the date of the financial statements and reported amount of revenues and expenses during the reporting period. Actual results could differ from those estimates. Any revision to accounting estimates is recognized in the period in which the same is determined.

E Current and non-current classification

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

An asset is current when it is:

- Expected to be realized or intended to 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; or
- Cash or cash equivalent unless restricted from being exchanged or used to settle a liability for at least twelve months after the reporting period.

All other assets are classified as non-current.

A liability is current when:

- 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; or
- There is no unconditional right to defer settlement of the liability for at least twelve months after the reporting period.

All other liabilities are classified as non-current.

3 Significant accounting policy

A Property Plant & Equipment

A.1 Initial recognition and measurement

An item of property, plant and equipments recognized as an asset if and only if it is probable that future economic benefits associated with the item will flow to the company and the cost of the item can be measured reliably.



Items of Property, Plant and Equipment are measured at cost less accumulated depreciation/amortization and accumulated impairment losses. Cost includes expenditure that is directly attributable to bringing the asset, inclusive of non-refundable taxes & duties, to the location and condition necessary for it to be capable of operating in the manner intended by management.

When parts of an item of property, plant and equipment have different useful lives, they are recognized separately.

Items of spare parts, stand-by equipment and servicing equipment which meet the definition of Property, Plant and Equipment are capitalized.

Property, Plant and Equipments which are not ready for intended use as on the date of Balance Sheet are disclosed as 'Capital Work-In-Progress'.

A.2. Subsequent costs

Subsequent expenditure is recognized as an increase in the carrying amount of the asset when it is probable that future economic benefits deriving from the cost incurred will flow to the enterprise and the cost of the item can be measured reliably.

The cost of replacing part of an item of property, plant and equipment is recognized in the carrying amount of the item if it is probable that the future economic benefits embodied within the part will flow to the Company and its cost can be measured reliably. The carrying amount of the replaced part is derecognized. The costs of the day-to-day servicing of Property, Plant and Equipment are recognized in profit or loss as incurred.

A.3. Derecognition

Property, Plant and Equipment are derecognized when no future economic benefits are expected from their use or upon their disposal. Gains and losses on disposal of an item of property, plant and equipment are determined by comparing the proceeds from disposal with the carrying amount of property, plant and equipment, and are recognized in the statement of profit and loss.

A.4. Depreciation/amortization

Depreciable amount for assets is the cost of an asset, or other amount substituted for cost, less its estimated residual value. Depreciation on PPE has been provided on the written down value method as per the useful life prescribed in Schedule II to the Companies Act, 2013.

Depreciation on additions to/deductions from property, plant and equipment during the year is charged on pro-rata basis from/up to the date on which the asset is available for use/disposed.

Depreciation on property, plant and equipment except leasehold land is provided on their estimated useful life as prescribed by Schedule II of Companies Act, 2013.

B Capital work-in-progress

The cost of self-constructed assets includes the cost of materials & direct labour, any other costs directly attributable to bringing the assets to the location and condition necessary for it to be capable of operating in the manner intended by management and borrowing costs.

Expenses directly attributable to construction of property, plant and equipment incurred till they are ready for their intended use are identified and allocated on a systematic basis on the cost of related assets.

C Intangible assets and intangible assets under development

C.1 Initial recognition and measurement

An intangible asset is recognized if and only if it is probable that the expected future economic benefits that are attributable to the asset will flow to the company and the cost of the asset can be measured reliably.

Intangible assets that are acquired by the Company, which have finite useful lives, are recognized at cost. Subsequent measurement is done at cost less accumulated amortization and accumulated impairment losses. Cost includes any directly attributable incidental expenses necessary to make the assets ready for its intended use.

Expenditure on development activities is capitalized only if the expenditure can be measured reliably, the product or process is technically and commercially feasible, future economic benefits are probable and the Company intends to and has sufficient resources to complete development and to use or sell the asset.

Expenditure incurred which are eligible for capitalizations under intangible assets are carried as intangible assets under development till they are ready for their intended use.

C.2 Subsequent costs

Subsequent expenditure is recognized as an increase in the carrying amount of the asset when it is probable that future economic benefits deriving from the cost incurred will flow to the enterprise and the cost of the item can be measured reliably.

C.3 Derecognition

An intangible asset is derecognized when no future economic benefits are expected from their use or upon their disposal. Gains and losses on disposal of an item of intangible assets are determined by comparing the proceeds from disposal with the carrying amount of intangible assets and are recognized in the statement of profit and loss.



C.4 Amortization

Intangible assets having definite life are amortized on straight line method in their useful lives. Useful life of computer software is estimated at Six years.

D Inventories

Inventories are valued at the lower of cost (e.g. on FIFO / weighted average basis) and the net realisable value after providing for obsolescence and other losses, where considered necessary. Cost includes all charges in bringing the goods to the point of sale, including STT, Cess and other levies.

E Cash and Cash Equivalents

Cash and cash equivalent in the balance sheet comprise cash at banks and cash on hand and short-term deposits with an original maturity of three months or less, which are subject to insignificant risk of change in value.

F Financial instruments

A financial instrument is any contract that gives rise to a financial asset of one entity and a financial liability or equity instrument of another entity.

F.1 Financial assets:

F.1.1 Initial recognition and measurement

All financial assets are recognized initially at fair value plus or minus, in the case of financial assets not recorded at fair value through profit or loss, transaction costs are attributable to the acquisition or issue of the financial asset, otherwise charged to Statement of Profit & Loss.

F.1.2 Subsequent measurement

Financial assets are subsequently classified and measured at:

- Financial assets at amortised cost
- Financial assets at fair value through profit and loss (FVTPL)
- Financial assets at fair value through other comprehensive income (FVOCI).

a) Trade Receivables

Trade receivables are initially recognised at fair value. Subsequently, these assets are held at amortised cost, using the effective interest rate (EIR) method net of any expected credit losses wherever applicable. The EIR is the rate that discounts estimated future cash income through the expected life of financial instrument.

b) Debt instruments

i) Measured at amortized cost

A 'debt instrument' is measured at the amortized cost if both the following conditions are met:

- (a) The asset is held within a business model whose objective is to hold assets for collecting contractual cash flows, and
- (b) Contractual terms of the asset give rise on specified dates to cash flows that are solely payments of principal and interest (SPPI) on the principal amount outstanding.

After initial measurement, such financial assets are subsequently measured at amortized cost using the EIR method. 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 in finance income in the profit or loss. The losses arising from impairment are recognized in the profit or loss.

ii) Measured at FVTOCI (Fair Value through OCI)

A 'debt instrument' is classified as at the FVTOCI if both of the following criteria are met:

- (a) The objective of the business model is achieved both by collecting contractual cash flows and selling the financial assets, and
- (b) The asset's contractual cash flows represent SPPI.

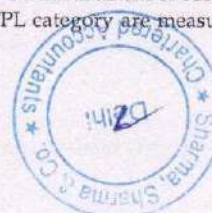
Debt instruments included within the FVTOCI category are measured initially as well as at each reporting date at fair value. Fair value movements are recognized in the OCI. However, the Company recognizes interest income, impairment losses & reversals and foreign exchange gain or loss in the profit and loss. On derecognition of the asset, cumulative gain or loss previously recognized in OCI is reclassified from the equity to profit and loss. Interest earned whilst holding FVTOCI debt instrument is reported as interest income using the EIR method.

iii) Measured at FVTPL (Fair value through profit or loss)

FVTPL is a residual category for debt instruments. Any debt instrument, which does not meet the criteria for categorization as at amortized cost or as FVTOCI, is classified as at FVTPL.

In addition, the Company may elect to classify a debt instrument, which otherwise meets amortized cost or FVTOCI criteria, as at FVTPL. However, such election is allowed only if doing so reduces or eliminates a measurement or recognition inconsistency (referred to as 'accounting mismatch'). Debt instruments included within the FVTPL category are measured at fair value with all changes recognized in the profit and loss.

c) Equity Instruments:



All investments in equity instruments in entities other than subsidiaries and joint ventures are measured at fair value. Equity instruments if held for trading are classified as at FVTPL. For all other equity instruments, the Company decides to classify the same either as at FVTOCI or FVTPL. The Company makes such election on an instrument by instrument basis. The classification is made on initial recognition and is irrevocable. Investments in subsidiaries and Joint Venture are carried at cost. The cost comprises price paid to acquire investment and directly attributable cost

If the company decides to classify an equity instrument as at FVTOCI, then all fair value changes on the instruments, excluding dividends, are recognized in the OCI. There is no recycling of the amounts from OCI to P&L, even on sale of investment as the company transfers cumulative gain or loss within the equity.

Equity instruments if classified as FVTPL category are measured at fair value with all changes recognized in the profit and loss.

F.1.3 Derecognition

A financial asset (or, where applicable, a part of a financial asset or part of a Company of similar financial assets) is primarily derecognized (i.e. removed from the Company's balance sheet) when:

- The contractual rights to receive cash flows from the asset have expired, or
- The Company has transferred its contractual rights to receive cash flows from the asset.

F.1.4 Impairment of Financial Asset

Expected credit losses are recognized for all financial assets subsequent to initial recognition in Statement of Profit & Loss other than financials assets in FVTPL category.

For recognition of impairment loss on financial assets other than Trade receivables, the company determines 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 impairment loss. However, If credit risk is 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 recognising impairment loss allowance based on 12- Month ECL.

For trade receivables Company applies 'simplified approach' which requires expected lifetime losses to be recognised from initial recognition of the receivables. The Company uses historical default rates to determine impairment loss on the portfolio of trade receivables. At every reporting date these historical default rates are reviewed and changes in the forward looking estimates are analysed.

For other assets, the Company uses 12 month ECL to provide for impairment loss where there is no significant increase in credit risk. If there is significant increase in credit risk full lifetime ECL is used.

F.2 Financial liabilities

F.2.1 Initial recognition and measurement

All financial liabilities are recognized at fair value and in case of loans, net of directly attributable cost. Fees of recurring nature are directly recognised in the Statement of Profit and Loss as finance cost.

F.2.2 Subsequent measurement

Financial liabilities are carried at amortized cost using the effective interest method. Amortized cost is calculated by taking into account any discount or premium on acquisition and any material transaction that are any integral part of the EIR. 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.

Financial liabilities carried at fair value through profit or loss are measured at fair value with all changes in fair value recognised in the Statement of Profit and Loss.

F.2.3 Derecognition

A financial liability is derecognized when the obligation under the liability is discharged or cancelled or expires. When an existing financial liability is replaced by another from the same lender on substantially different terms, or the terms of an existing liability are substantially modified, such an exchange or modification is treated as the derecognition of the original liability and the recognition of a new liability. The difference in the respective carrying amounts is recognized in the statement of profit or loss.

F.3 Derivative financial instruments

The Company uses forwards to mitigate the risk of changes in exchange rates. Such derivative financial instruments are initially recognised at fair value on the date on which a derivative contract is entered into and are also subsequently measured at fair value. Derivatives are carried as financial assets when the fair value is positive and as financial liabilities when the fair value is negative. Any gains or losses arising from changes in the fair value of derivatives are taken directly to Statement of Profit and Loss.

G Fair value measurement



The Company measures financial instruments, such as, derivatives at fair value at each balance sheet date. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The fair value measurement is based on the presumption that the transaction to sell the asset or transfer the liability takes place either:

- In the principal market for the asset or liability, or
- In the absence of a principal market, in the most advantageous market for the asset or liability.

The principal or the most advantageous market must be accessible by the company. The fair value of an asset or a liability is measured using the assumptions that market participants would use when pricing the asset or liability, assuming that market participants act in their economic best interest. A fair value measurement of a non-financial asset takes into account a market participant's ability to generate economic benefits by using the asset in its highest and best use or by selling it to another market participant that would use the asset in its highest and best use. The company uses valuation techniques that are appropriate in the circumstances and for which sufficient data are available to measure fair value, maximizing the use of relevant observable inputs and minimizing the use of unobservable inputs. All assets and liabilities for which fair value is measured or disclosed in the financial statements are categorized within the fair value hierarchy, described as follows, based on the lowest level input that is significant to the fair value measurement as a whole:

Level 1 - Quoted (unadjusted) market prices in active markets for identical assets or liabilities

Level 2 - Valuation techniques for which the lowest level input that is significant to the fair value measurement is directly or indirectly observable

Level 3 - Valuation techniques for which the lowest level input that is significant to the fair value measurement is unobservable.

For assets and liabilities that are recognized in the financial statements on a recurring basis, the company determines whether transfers have occurred between levels in the hierarchy by re-assessing categorization (based on the lowest level input that is significant to the fair value measurement as a whole) at the end of each reporting period. The Company determines the policies and procedures for both recurring fair value measurement, such as derivative instruments and unquoted financial assets measured at fair value, and for non-recurring measurement, such as assets held for distribution in discontinued operations.

F Impairment of Non-Financial Assets

The Company, in accordance with the Indian Accounting Standard (Ind AS) 36 "Impairment of Assets", has adopted the practice of assessing at each Balance Sheet date whether there is any indication that an asset may be impaired. If any such indication exists, then the company provides for the loss for impairment of Assets after estimating the recoverable amount of the assets.

G Provisions, Contingent Liabilities and Contingent Assets

Provision are measured at the Present value of the management's best estimate of the expenditure required to settle the present obligation at the end of reporting period. Provisions involving substantial degree of estimation in measurement are recognized when there is a present obligation as a result of past events and it is probable that there will be an outflow of resources.

Contingent liabilities are disclosed only when there is a possible obligation arising from past events, the existence of which will be confirmed only by the occurrence or non-occurrence of one or more uncertain future events which is not wholly within the control of the Company or a present obligation that arises from past events where it is either not probable that an outflow of resources will be required to settle the obligation or estimate of the amount cannot be measured reliably.

No contingent asset is recognized but disclosed by way of notes to accounts only when its recognition is virtually certain.

H Revenue Recognition

Revenue is recognized to the extent that it is probability that the economic benefits will flow to the company and the revenue can be reliably measured. The Following specific criteria must also be met before revenue is recognized.

Shares Purchases / Sales in Capital Market Segment has been taken on absolute basis. Derivative Segments Transactions has been taken on difference bill basis.

Dividend income is recognized when the right to receive the income is established.

Interest income is recognised, when no significant uncertainty as to measurability or collectblitiy exists, on a time proportion basis taking into account the amount outstanding and the applicable interest rate , using the effective interest rate method (EIR).

I Foreign Currency Conversions/Transactions

Foreign Currency Transactions are recorded at the exchange rates prevailing on the date of the transactions. Gains and losses arising out of subsequent fluctuations are accounted for on actual payments or realisations as the case may be. Monetary assets and liabilities denominated in foreign currency as on Balance Sheet date are translated into functional currency at the exchange rates prevailing on that date and Exchange differences arising out of such conversion are recognised in the Statement of Profit and Loss.

J Income Taxes

Income tax expense for the year comprises of current tax and deferred tax. It is recognised in the Statement of Profit and Loss except to the extent it relates to any business combination or to an item which is recognised directly in equity or in other comprehensive income.



a) **Current Tax**

Current tax expense is made on the basis of estimated taxable income for the current accounting period in accordance with the provisions of Income Tax Act, 1961 and judicial interpretations thereof as at the Balance Sheet date and takes into consideration various deductions and exemptions to which the Company is entitled to as well as the reliance placed by the Company on the legal advices received by it.

b) **Deferred Tax**

Deferred tax charge or credit reflects the tax effects of temporary differences arising between the tax bases of assets and liabilities and their carrying amounts in the financial statements. The deferred tax charge or credit and the corresponding deferred tax liabilities or assets are recognized using the tax rates that have been enacted or substantively enacted by the Balance Sheet date. Deferred tax assets are reviewed at each Balance Sheet date and are written-down or written-up to reflect the amount that is reasonably certain (as the case may be) to be realized.

Deferred tax assets and deferred tax liabilities are offset when there is a legally enforceable right to set off assets against liabilities representing current tax and where the deferred tax assets and the deferred tax liabilities relate to taxes on income levied by the same governing taxation law.

Deferred tax assets are recognised for all deductible temporary differences and unused tax losses only if it is probable that future taxable amounts will be available to utilise those temporary differences and losses.

Current and deferred tax is recognised in profit or loss, except to the extent that it relates to items recognised in other comprehensive income or directly in equity. In this case, the tax is also recognised in other comprehensive income or directly in equity, respectively.

K Employee Benefits

Employees benefits include provident fund, superannuation fund, employee state insurance scheme, gratuity fund, compensated absences, long service awards and post-employment medical benefits. Retirement benefits are accounted for as and when paid.

Any actuarial gains or losses pertaining to components of re-measurements of net defined benefit liability/(asset) are recognized in OCI in the period in which they arise.

L Borrowing Cost

General and Specific Borrowing Cost that are directly attributable to the acquisition or construction or production of qualifying assets are capitalized as part of the cost of such assets upto the date when such assets are ready for intended use. Qualified assets are assets that necessarily take a substantial period of time to get ready for their intended use or sale.

Other borrowing costs are charged as expenses in the year in which they are incurred.

Investment income earned on the temporary investment of specific borrowings pending their expenditure on qualifying assets is deducted from the borrowing cost eligible for capitalisation.

M Earning Per Share

Basic Earning Per Share is calculated by dividing the net profit or loss for the period attributable to equity shareholders by weighted average number of equity shares outstanding during the period.

For the purpose of calculating diluted earnings per share, net profit after tax during the year and the weighted average number of shares outstanding during the year are adjusted for the effect of all dilutive potential equity shares.

N Leases

As Lessee

Accounting for finance leases

The Company, as a lessee, recognises a right-of-use asset and a lease liability for its leasing arrangements, if the contract conveys the right to control the use of an identified asset.

The contract conveys the right to control the use of an identified asset, if it involves the use of an identified asset and the Company has substantially all of the economic benefits from use of the asset and has right to direct the use of the identified asset. The cost of the right-of-use asset shall comprise of the amount of the initial measurement of the lease liability adjusted for any lease payments made at or before the commencement date plus any initial direct costs incurred. The right-of-use assets is subsequently measured at cost less any accumulated depreciation, accumulated impairment losses, if any and adjusted for any remeasurement of the lease liability. The right-of-use assets is depreciated using the straight-line method from the commencement date over the period of lease term.

The Company measures the lease liability at the present value of the lease payments that are not paid at the commencement date of the lease. The lease payments are discounted using the incremental borrowing rate of the company.

For short-term and low value leases, the Company recognises the lease payments as an operating expense on a straight-line basis over the lease term

O Segment Reporting



Operating segments are reported in a manner consistent with the internal reporting provided to the chief operating decision maker. Management of the Company is responsible for allocating resources and assessing the performance of the operating segment. Revenue, expenses assets and liabilities which are common to the company are shown as results, assets and liabilities as unallocable.

P Statement of Cash Flows

Statement of cash flows is prepared in accordance with the indirect method prescribed in Ind AS-7 'Statement of cash flows.

Q Non-current assets held for sale

The Company classifies non-current assets as held for sale if their carrying amounts will be recovered principally through a sale rather than through continuing use. Actions required to complete the sale should indicate that it is unlikely that significant changes to the sale will be made or that the decision to sell will be withdrawn. Management must be committed to the sale expected within one year from the date of classification.

The criteria for held for sale classification is regarded met only when the assets is available for immediate sale in its present condition, subject only to terms that are usual and customary for sales of such assets, its sale is highly probable; and it will genuinely be sold, not abandoned. The Company treats sale of the asset to be highly probable when:

The appropriate level of management is committed to a plan to sell the asset,

- An active programme to locate a buyer and complete the plan has been initiated (if applicable),
- The asset is being actively marketed for sale at a price that is reasonable in relation to its current fair value,
- The sale is expected to qualify for recognition as a completed sale within one year from the date of classification , and
- Actions required to complete the plan indicate that it is unlikely that significant changes to the plan will be made or that the plan will be withdrawn.

Non-current assets held for sale are measured at the lower of their carrying amount and the fair value less costs to sell. Assets and liabilities classified as held for sale are presented separately in the balance sheet.

Property, plant and equipment and intangible assets once classified as held for sale/ distribution to owners are not depreciated or amortised.



AKG EXIM LIMITED
CIN: L00063DL2005PLC139045

Notes to Standalone financial statements for the year ended 31st March, 2021
STATEMENT OF CHANGES IN EQUITY

A. Equity Share Capital

For the year ended 31st March,2020

Balance as at 1st April 2019	Changes in equity share capital during the year	Balance as at 31st March 2020
662.01	-	662.01

For the year ended 31st March 2021

Balance as at 1st April 2020	Changes in equity share capital during the year	Balance as at 31st March 2021
662.01	397.21	1,059.22

B. Other Equity

For the year ended 31st March 2021

Particulars	Reserve and surplus			Total
	Securities Premium	General Reserve	Retained Earnings	
Balance at the beginning of the reporting year-01-04-2020	778.89	75.33	452.85	1,307.07
Less: Bonus Issue of Shares	(397.21)			(397.21)
Profit for the year	-	-	106.95	106.95
Other comprehensive income	-	-	-	-
Total Comprehensive Income for the Year	381.68	75.33	559.80	1,016.81
Transfer to General Reserve	-	-	-	-
Balance at the end of the reporting year-31.03.2021	381.68	75.33	559.80	1,016.81

For the year ended 31st March 2020

Particulars	Reserve and surplus			Total
	Securities Premium	General Reserve	Retained Earnings	
Balance at the beginning of the reporting year-01-04-2019	778.89	75.33	344.30	1,198.52
Profit for the year	-	-	108.55	108.55
Other comprehensive income	-	-	-	-
Total Comprehensive Income for the Year	778.89	75.33	452.85	1,307.07
Transfer to General Reserve	-	-	-	-
Balance at the end of the reporting year-31.03.2020	778.89	75.33	452.85	1,307.07



Notes to Standalone financial statements for the year ended 31st March, 2021

2 NON CURRENT ASSETS : PROPERTY, PLANT AND EQUIPMENT

Particulars	GROSS BLOCK			ACCUMULATED DEPRECIATION			NET BLOCK			
	As at 1st April 2020	Additions	Disposals	As at 31st March 2021	As at 1st April 2020	Depreciation charged during the year	Deductions	As at 31st March 2021	Net Carrying Amount as on 31.03.21	Net Carrying Amount as on 31.03.20
Land	-	-	-	-	-	-	-	-	-	-
Buildings	108.47	-	-	108.47	64.61	2.00	-	66.61	41.86	43.86
Plant and Machinery	2.65	-	-	2.65	1.68	0.37	-	2.05	0.60	0.97
Furniture and Fittings	0.15	-	-	0.15	0.12	0.01	-	0.13	0.02	0.03
Vehicles	71.88	-	-	71.88	33.99	13.29	-	47.28	24.60	37.89
Office Equipments	10.61	0.02	0.16	10.47	6.29	1.79	-	8.08	2.40	4.33
Total	193.76	0.02	0.16	193.62	106.68	17.46	-	124.14	69.48	87.08
Capital Work- in-Progress	-	-	-	-	-	-	-	-	-	-
Total	193.76	0	0	193.62	106.68	17.46	-	124.14	69.48	87.08

Particulars	GROSS BLOCK			ACCUMULATED DEPRECIATION			NET BLOCK			
	As at 1st April 2019	Additions	Disposals	As at 31st March 2020	As at 1st April 2019	Depreciation charged during the year	Deductions	As at 31st March 2020	Net Carrying Amount as on 31.03.2020	Net Carrying Amount as on 01.04.2019
Land	132.76	-	132.76	-	-	-	-	-	-	132.76
Buildings	692.74	15.70	599.97	108.47	32.43	32.18	-	64.61	43.86	660.31
Plant and Machinery	1.82	4.89	4.06	2.65	0.25	1.43	-	1.68	0.97	0.02
Furniture and Fittings	0.15	-	-	0.15	0.08	0.04	-	0.12	0.03	0.07
Vehicles	71.88	-	-	71.88	13.46	20.53	-	33.99	37.89	58.42
Office Equipments	10.23	0.41	0.02	10.61	2.86	3.43	-	6.29	4.33	8.92
Total	909.57	21.00	736.82	193.76	49.08	57.60	-	106.68	87.08	860.49
Capital Work- in-Progress	-	-	-	-	-	-	-	-	-	-
Total	909.57	21.00	736.82	193.76	49.08	57.60	-	106.68	87.08	860.49

Notes:

2.1 For Property, Plant and Equipment existing as on 1st April 2019, i.e. the date of transition to Ind AS for the company, the company has considered previous GAAP (i.e., IGAAP) carrying value as deemed cost as per the option available under para D7AA of Ind AS 101 "First Time Adoption".

The net carrying value of assets comprises of:

Particulars	Land	Buildings	Non Factory Building	Plant and Machinery	Furniture and Fittings	Vehicles	Office Equipments	Total
Cost/Deemed cost as at April 1, 2019	132.76	660.31	-	0.02	0.07	58.42	8.92	860.49
Accumulated depreciation	-	-	-	-	-	-	-	-
Carrying Value as on 01.04.2019	132.76	660.31	-	0.02	0.07	58.42	8.92	860.49

AKG EXIM LIMITED
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Notes to Standalone financial statements for the year ended 31st March, 2021

NOTE NO.3 NON CURRENT FINANCIAL ASSETS : INVESTMENTS

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Equity instruments (fully paid-up-unless otherwise stated) Unquoted (designated at Amortised Cost)			
(a) BKS Metalics Private Limited, Neemrana, Rajasthan	15.30	-	-
(b) ASRI Trade Pte. Ltd. (Singapore)	37.25	-	-
TOTAL	52.55	-	-
Aggregate amount of quoted investments and market value thereof	-	-	-
Aggregate amount of Unquoted Investment	52.55	-	-

4. NON CURRENT ASSETS - OTHER FINANCIAL ASSETS

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Security Deposits	4.61	3.71	15.82
TOTAL	4.61	3.71	15.82

5. NON CURRENT ASSETS - OTHER NON CURRENT ASSETS

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Prepaid Expenses	15.15	22.92	38.07
Others	-	-	-
TOTAL	15.15	22.92	38.07

6. CURRENT ASSETS - INVENTORIES

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
(As valued and certified by the Management)			
Finished Goods	313.95	304.64	1,089.50
TOTAL	313.95	304.64	1,089.50

7. CURRENT FINANCIAL ASSETS - TRADE RECEIVABLE

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Trade Receivable			
Unsecured, considered good	2,309.99	1,720.07	3,110.99
Less: Loss allowance	-	-	-
Total	2,309.99	1,720.07	3,110.99
Total Trade Receivables	2,309.99	1,720.07	3,110.99



8. CURRENT FINANCIAL ASSETS - SHORT TERM LOANS

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Unsecured, considered good	58.85	-	-
Total	58.85	-	-

9. CURRENT FINANCIAL ASSET- CASH AND CASH EQUIVALENT

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Balances With Banks :			
Cash-in-hand	1.29	2.42	7.79
In Current/Cash Credit Account	0.56	238.22	(0.10)
Fixed Deposit (L.C./Margin Money)	-	96.18	271.47
Total	1.85	336.82	279.16

10. CURRENT FINANCIAL ASSET- OTHER CURRENT FINANCIAL ASSETS

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Advance recoverable in cash or kind or for value to be received	88.67	-	22.61
Interest Accrue but not due on FDR's	-	17.68	11.62
Total	88.67	17.68	34.23

11. CURRENT ASSET- OTHER CURRENT ASSETS

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Advance To Suppliers	286.08	411.57	189.18
Prepaid Expenses	1.28	1.05	1.48
Statutory and Other Receivables	246.32	235.87	345.87
Total	533.68	648.48	536.53



Notes to Standalone financial statements for the year ended 31st March, 2021
12. EQUITY SHARE CAPITAL

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Authorised Share Capital			
1,07,50,000 (Previous year 1,00,00,000) Equity Shares of Rs. 10/- each	1,075.00	1,000.00	1,000.00
	1,075.00	1,000.00	1,000.00
Issued, Subscribed and Paid-up Share Capital			
1,05,92,192 (Previous year 66,20,120) Equity Share of Rs. 10/- each fully paid up	1,059.22	662.01	662.01
	1,059.22	662.01	662.01

12.1 Reconciliation of the number of shares at the beginning and at the end of the year

There has been no change/ movements in number of shares outstanding at the beginning and at the end of the year.

12.2 Terms/ Rights attached to Equity Shares :

The Company has only one class of issued shares i.e., Ordinary Shares having par value of Rs. 10 per share. Each holder of the Ordinary Shares is entitled to one vote per share. In the event of liquidation, the ordinary shareholders are eligible to receive the remaining assets of the Company after payment of all preferential amounts, in proportion to their shareholding.

12.3 Shareholding Pattern with respect of Holding or Ultimate Holding Company

The Company does not have any Holding Company or Ultimate Holding Company.

12.4 Details of Equity Shareholders holding more than 5% shares in the Company.

Name of the Shareholder	As at March 31, 2021		As at March 31, 2020		As at April 1, 2019	
	No. of Shares	% Holding	No. of Shares	% Holding	No. of Shares	% Holding
RAJEEV GOEL	1,87,072	1.76%	30,80,920	46.54%	30,80,920	63.65%
MAHIMA GOEL	69,90,400	65.89%	15,29,000	23.10%	15,29,000	31.59%
MULTIPLEX CAPITAL LIMITED	3,47,498	3.28%	6,28,000	9.49%	-	-

13. OTHER EQUITY

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Securities Premium Account	381.68	778.89	778.89
General Reserve	75.33	75.33	75.33
Capital Redemption Reserve	-	-	-
Retained Earnings	559.80	452.85	344.30
Other Reserves	-	-	-
Total	1,016.81	1,307.07	1,198.52

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Securities Premium Account			
Balance at the beginning of the year	778.89	778.89	405.09
Add: Additions during the year	-	-	373.80
Less: Bonus Issue of Shares	(397.21)	-	-
Balance at the end of the year	381.68	778.89	778.89
General Reserve			
Balance at the beginning of the year	75.33	75.33	75.33
Add: Transferred from Retained Earnings	-	-	-
Balance at the end of the year	75.33	75.33	75.33
Capital Redemption Reserve			
Opening Balance	-	-	-
Add: Addition during the year	-	-	-
Balance at the end of the year	-	-	-
Retained Earnings			
Balances at the beginning of the year	452.85	344.30	242.70
Add: Profit for the year	106.95	108.55	108.30
Transferred from /to reserve	-	-	(6.70)
Net actuarial gain/loss on defined benefit plan, net of tax	-	-	-
Add: Reclassification of financial instruments from OCI to Retained Earnings	-	-	-
	559.80	452.85	344.30



Items of other comprehensive income recognised directly in retained earnings				
Net actuarial gain/loss on defined benefit plan, net of tax	-	-	-	
Balance at the end of the year	559.80	452.85	344.30	
Other Reserves				
Equity instrument through Other Comprehensive Income				
Balance at the beginning	-	-	-	
Balance at the end of the year	-	-	-	
Total Reserve & Surplus	1,016.81	1,307.07	1,198.52	
14. NON CURRENT FINANCIAL LIABILITIES- BORROWINGS				
Others	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019	
From Banks	33.57	43.81	49.12	
Other Loans	-	-	-	
From Others	-	-	20.70	
	33.57	43.81	69.82	
The above amount includes				
Secured Borrowings (Refer note 16.1)	33.57	43.81	69.82	
Unsecured Borrowings	-	-	-	
Net tax assets/liabilities	33.57	43.81	69.82	
15. NON CURRENT LIABILITIES- DEFERRED TAX LIABILITIES (NET)				
Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019	
Arising on account of :				
Accelerated Depreciation on Property, Plant & Equipment	29.64	29.22	22.44	
Others	-	-	-	
	29.64	29.22	22.44	
Less: Deferred Tax Assets				
Arising on account of :				
Others	-	-	-	
	-	-	-	
Deferred Tax Liabilities (Net)	29.64	29.22	22.44	
Movement in Deferred Tax Balances				
31st March 2021				
Particulars	Net balance 01.04.2020	Recognise in Profit & Loss	Recognised in OCI	Net balance 31.03.2021
Difference in book depreciation & tax depreciation	29.22	0.42	-	29.64
Others	-	-	-	-
Tax assets/liabilities	29.22	0.42	-	29.64
Less : Deferred assets for deferred tax liability	-	-	-	-
Net tax assets/liabilities	29.22	0.42	-	29.64
31st March 2020				
Particulars	Net balance 01.04.2019	Recognise in Profit & Loss	Recognised in OCI	Net balance 31.03.2020
Difference in book depreciation & tax depreciation	22.44	6.78	-	29.22
Others	-	-	-	-
Tax (assets)/liabilities	22.44	6.78	-	29.22
Less : Deferred assets for deferred tax liability	-	-	-	-
Net tax (assets)/liabilities	22.44	6.78	-	29.22
16. CURRENT FINANCIAL LIABILITIES- BORROWINGS				
Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019	
Loans Repayable on Demand				
From Banks	853.41	951.79	2,858.90	
Other Loans				
From Banks (ECGLs Scheme)	68.07	-	6.05	
	921.48	951.79	2,864.94	
The above amount includes				
Secured Borrowings (Refer note below)	921.48	951.79	2,864.94	
Unsecured Borrowings	-	-	-	
Total	921.48	951.79	2,864.94	



Nature of security			
Note no. 20.1 Working capital borrowings are secured charge by way of hypothecation on Book debts; Floating charge; Movable property (not being pledge); Ex ch for CC, LER and LC and 2nd charge for WCTL on first pari passu basis			
17. CURRENT FINANCIAL LIABILITIES- TRADE PAYABLES			
Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Trade Payables for goods and services			
Total outstanding dues of micro, small and medium enterprises			
Others- Trade Payables for goods and services	288.68	93.19	570.31
Total	288.68	93.19	570.31
18. OTHER CURRENT FINANCIAL LIABILITIES			
Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Expenses Payable	48.80	16.08	2.53
Total	48.80	16.08	2.53
19. CURRENT LIABILITIES- OTHER CURRENT LIABILITIES			
Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Statutory dues	1.58	0.65	2.72
TDS Payable	-	-	-
Others advances from customer	-	-	526.34
Total	1.58	0.65	529.06
20. CURRENT LIABILITIES- PROVISION			
Particulars	As at March 31, 2021	As at March 31, 2017	As at April 1, 2016
Provision for Employee Benefits	11.28	1.47	14.43
Provision for Taxation	-	-	-
Total	11.28	1.47	14.43
21. CURRENT TAX LIABILITIES (NET)			
Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Provision For Tax Deducted At Source	37.72	36.10	30.72
Total	37.72	36.10	30.72



Notes to Standalone financial statements for the year ended 31st March, 2021

22. REVENUE FROM OPERATIONS

Particulars	Year Ended 31st March 2021	Year Ended 31st March 2020
Sale of traded goods (Refer Note below (i))	7,867.77	6,647.29
Less: Discount allowed/Claim Paid/Received	116.11	9.64
	7,751.67	6,637.65
Note (i)		
Traded goods	7,586.28	6,351.96
Commission	-	86.52
Domestic Consultancy Services	58.55	199.16
Export Consultancy Services	106.84	-
	7,751.67	6,637.65
Total	7,751.67	6,637.65

23. OTHER INCOME

Particulars	Year Ended 31st March 2021	Year Ended 31st March 2020
Interest Income		
On Banks Deposits	1.79	32.43
On Other	-	-
Dividend Income		
On Long-term investment	-	-
On Current investment	-	-
(Gain)/ Loss on fair valuation of investment through FVTPL	-	-
Other Non Operating Income		
Gain on sale/discard of Fixed Assets (Net)	-	-
Excess Provision written back	-	-
Net Gain/(Loss) on Foreign currency transaction and translation *	-	-
Excess Depreciation written back	-	-
Miscellaneous Income	17.93	290.35
Sundry Balance Written Off	-	-
Total	19.72	322.78

24. Purchases of stock-in-trade

Particulars	Year Ended 31st March 2021	Year Ended 31st March 2020
Purchase of Traded Goods	7,245.26	5,197.61
Less: Discount received	-	(5.47)
	7,245.26	5,192.14



25. (INCREASE)/ DECREASE IN INVENTORIES OF FINISHED GOODS, WORK-IN-PROGRESS

Particulars	Year Ended 31st March 2021	Year Ended 31st March 2020
Inventories at the beginning of the year Finished Goods	304.64	1,089.50
Inventories at the end of the year Finished Goods	313.95	304.64
Total	(9.31)	784.86

26. EMPLOYEE BENEFITS EXPENSE

Particulars	Year Ended 31st March 2021	Year Ended 31st March 2020
Salaries & Wages	53.38	87.60
Contribution to Provident and Other Funds	2.17	3.93
Staff Welfare Expenses	0.60	1.80
Total	56.15	93.33

27. FINANCE COST

Particulars	Year Ended 31st March 2021	Year Ended 31st March 2020
Interest Expenses To Banks on Working Capital Loans On Deposits and Others	89.30 -	125.55 5.83
Other Borrowing Costs Other Financial Charges	- -	- -
Total	89.30	131.38

28. OTHER EXPENSES

Particulars	Year Ended 31st March 2021	Year Ended 31st March 2020
Annual Listing Fee (NSE)	3.66	-
Audit fees (Refer Note (i) below)	1.30	0.80
Bank charges	4.32	26.90
Conveyance expenses	2.95	1.65
Business Promotion	2.96	8.79
Advertisement	0.53	0.36
Electricity expenses	9.66	8.44
Freight charges	7.77	106.10
Insurance expenses	1.72	2.25
Freight and Cartage Outward	1.13	10.05
Legal and professional charges	13.36	6.82
Comission on Sale	1.10	12.79
Maintainance Charges	3.41	12.46
News Papers & Periodicals Expenses	-	0.03
Miscellaneous expenses	2.14	3.33
Postage and courier charges	0.04	0.55
Festival Celebration Expenses	0.16	-
Printing and stationary	0.53	0.69
Rent	17.30	4.94
Short & Excess Amount W/o	0.02	0.02
Telephone expenses	4.35	5.26
Membership / Subscription Fees	0.87	0.35
Expenses related to Rice business	-	4.27



Notes to the financial statements for the year ended 31st March, 2021 (Contd.)

Donation	-	1.00
Travelling expenses	0.75	16.60
Vehicle repair and maintenance	4.42	5.09
Rates & Taxes	4.09	8.67
Listing Expenses (SME)	-	0.15
Shipping and Clearing Expenses	53.65	190.65
Packing Expenses	-	-
Custom Duty on Import	15.43	50.02
Preliminary Expenses W/o	7.77	7.77
Gain/Loss on Foreign Currency Transactions and Translations		
	30.00	10.38
Directors Sitting Fee	3.10	2.00
Directors Remuneration	24.00	37.50
Computer & Software Expenses	0.48	1.53
Website Expenses	1.16	1.49
Filing Fee Expenses	3.22	-
Repair & Maintenance General	0.10	-
Total	227.44	549.70

28.1 Details in respect of Auditors' Remuneration

Statutory Auditors

Audit Fees	1.05	0.55
Tax Audit Fees	0.25	0.25
Total	1.30	0.80



AKG EXIM LIMITED
CIN: L00063DL2005PLC139045

Notes to Standalone financial statements for the year ended 31st March, 2021

Note no. 29. Disclosure as per Ind AS 2 'Inventories'

Inventory purchased have been recognised as expense. The details are as under:

Particulars	2020-21	2019-20
Purchase of Traded Goods	7,245.26	5,192.14
Total	7,245.26	5,192.14

Note no 30. Disclosure as per Ind AS 12 'Income Tax'

a) Income Tax Expense

i) Income Tax recognised in statement of profit & loss account.

Particulars	2020-21	2019-20
Current Tax Expenses		
Current year		
Adjustment for earlier year	37.72	36.10
Total current Tax expenses	37.72	36.10
Deferred Tax Expenses	0.42	6.78
Mat Credit Entitlement	-	-
Total Income tax expenses	38.14	42.88

ii) Income tax recognised in other comprehensive income

Particular	2020-21			2019-20		
	Before tax	Tax expense/ Benefit	Net of tax	Before tax	Tax expense/ Benefit	Net of tax
-Net actuarial gain/loss on defined benefit plan	-	-	-	-	-	-
- Net gain/loss on fair value of equity instrument	-	-	-	-	-	-

iii) Reconciliation of tax expense and accounting profit multiplied by India's domestic rate

Particulars	2020-21	2019-20
Profit before tax	145.09	151.43
Tax using the domestic tax rate	27.82%	27.820%
Tax effect of :		
Non deductible tax expenses	0.42	6.78
Deductable tax expenses	37.72	36.10
Total tax expenses in the statement of profit and loss account	38.14	42.88

Note no. 31. Disclosure as per Ind AS 19 ' Employee Benefit'

Employee Benefits" the company paid short term benefits which fall due wholly within 12 months after the end of the period in which the employee renders the related service. Long term benefits are recorded when they are paid.

Note 32 Disclosure as per Ind AS 108-Segment Reporting

In accordance with the requirements of INDAS 108- "Segment Reporting" issued by The Institute of Chartered Accountant of India, The Company has no other reportable business or geographical segment.

Note no. 33. Disclosure as per Ind AS 24 'Related party Disclosures'

A) List of related party

i) Parties holding significant influence

M/s AKG Engineers Private Limited

M/s A. K Gupta & Co.

M/s ASRI Trade Pte. Ltd.

M/s BKS Metals Private Limited

ii) Key Management Personnel

Mr. Rajeev Goel

Mrs. Mahima Goel

Mr. Rahul Bajaj

Ms. Simpal Singh (Resigned)

Ms. Pragati Paruika



Notes to the financial statements for the year ended 31st March, 2021 (Contd.)

iii) Relatives of the Key Management Personnel

Mr. Sanjeev Goel
Mr. Aakash Goel
Mrs. Renu Goel

b) The following transactions were carried out with the related parties during the year :-

i) Related Parties / Parties Holding Significant Influence

Particulars	2020-21	2019-20
(A) Expenses		
Import Purchases		
ASRI Trade Pte. Ltd.	28.71	-
Rent		
AKG Engineers Private Limited	14.20	-
Remuneration		
Mr. Rajeev Goel	9.60	24.00
Mrs. Mahima Goel	14.40	17.00
Mr. Rahul Bajaj	4.95	1.20
Directors Sitting Fee		
Mr. Rakesh Mohan	1.05	1.00
Mr. Laxman Singh Rao	1.05	1.00
Mr. Kartik Guglani	1.05	0.25
(B) Income		
Consultancy Services		
M/s ASRI Trade Pte. Ltd.	66.33	-
Scrap Sales Revenue		
M/s AKG Engineers Private Limited	-	98.34
M/s A.K Gupta & Co.	-	163.89

ii) Key Management Personnel Compensation

There is no transaction other than managerial remuneration paid as per terms of appointment duly approved by the shareholders. Following are the details of such managerial remuneration:

Particulars	2020-21	2019-20
1) Short Term Employee Benefits		
Salaries & Allowances	32.10	44.45
Contribution to Provident Fund	-	-
Others- perquisites value	-	-
Commission on Profit to the Managing Director & CFO	-	-
2) Post Employment Benefits	0.25	-
3) Other Long Term Benefits	-	-
Total	32.35	44.45

The above does not include gratuity provision as the same is on overall company basis.

Terms and conditions:

All the transactions were made on normal commercial terms and conditions and at market rates. All outstanding balances are unsecured and are repayable in cash.



Notes to the financial statements for the year ended 31st March, 2021 (Contd.)

Note no. 34. Disclosure as per Ind AS 33 'Earning Per Share'

Earning Per Share

Particulars	Units	For the year ended March 31, 2021	For the year ended March 31, 2020
Equity Shares			
Basic net earnings per share Attributable to Shareholders For BEPS/DEPS	Rs. Lakhs	106.95	108.55
Weighted average no shares for BEPS/DEPS	No.	1,05,92,192	66,20,120
Basic Earnings per share/Diluted Earning Per Share	Rs.	1.01	1.64

35 Contingent liabilities to the extent not provided for in respect of

Particulars	2020-21	2019-20
(A) Claims against company not acknowledged as Debts:-		
(i) Income Tax matters in appeals	-	-
(ii) Service Tax demand not admitted by the company and for which appeals have been filed with appropriate authorities.	-	-
(iii) Excise duty demand not admitted by the company and for which appeals have been filed with appropriate authorities.	filed	-
(B) Guarantees:-		
(i) Letter of Credit against purchase of raw materials	-	-
(ii) Bonds Executed with Customs & Excise Authorities	-	-
(iii) Bank Guarantees	-	-

(iii) Commitments--NIL

Note no. 36 Disclosure as per Ind AS 107 'Financial instrument disclosure'

A) Capital management

For the purpose of Company's Capital Management, Capital includes issued equity share capital and borrowings excluding working capital loans from various financial institutions. The primary objective of Company's Capital Management is to maximize shareholder's value and to maintain an appropriate capital structure of debt and equity. The company manages its capital structure and makes adjustments in the light of changes in economic environment and the requirements of financial covenants.

Equity share capital and other equity are considered for the purpose of Company's capital management. The Company manages its capital so as to safeguard its ability to continue as a going concern and to optimise returns to shareholders. The capital structure of the Company is based on management's judgement of its strategic and day-to-day needs with a focus on total equity so as to maintain investor, creditors and market confidence. The management and the Board of Directors monitors the return on capital as well as the level of dividends to shareholders. The Company may take appropriate steps in order to maintain, or if necessary adjust, its capital structure.

Particulars	Year ended March 31, 2021	Year ended March 31, 2020	Year ended 1 April, 2019
Interest-bearing loans and borrowings	955.05	995.60	2,934.77
Less: cash and bank balance (including other bank balance)	1.85	336.82	279.16
Net Debt	953.20	658.78	2,655.61
Equity share capital	1,059.22	662.01	662.01
Other equity	1,016.81	1,307.07	1,198.52
Total Capital	2,076.03	1,969.08	1,860.53
Capital and Net debt	3,029.23	2,627.86	4,516.14
Gearing Ratio	31.47%	25.07%	58.80%

B) Financial risk management

The Company's Financial Risk Management is an integral part of how to plan and execute its business strategies. The Company's financial risk management is set by the Managing Board. The Company's principal financial liabilities comprise loans and borrowings, trade payables and other payables. The main purpose of these financial liabilities is to finance the company's operations. The company's principal financial assets include trade & other receivables and cash and short term deposits.



Notes to the financial statements for the year ended 31st March, 2021 (Contd.)

Risk			
Credit Risk	Trade receivables Financial assets measured at Amortised cost and cash & cash equivalents	Ageing analysis, Credit Ratings Credit ratings	Credit limits, Escrow Cover, letters of credit
Liquidity risk	Borrowing and other liabilities	Rolling cash flows forecast	Availability of committed credit lines and borrowing facilities
Market risk-Interest rate risk	Long-term Borrowings at variable rates	Sensitivity analysis, Cash Flow Analysis	Different kinds of loan arrangements with varied terms (eg. Fixed, floating, rupee, foreign currency, etc.) & swapping of high cost debts into low cost debt.

(f) Credit risk

Credit risk is the risk of financial loss to the Company if a customer or counterparty to a financial instrument fails to meet its contractual obligations resulting in a financial loss to the Company. Credit risk arises principally from trade receivables, loans & advances.

Provision for Expected Credit or Loss

(i) Financial assets for which loss allowance is measured using 12 month expected credit losses.

The Company has assets where the counter-parties have sufficient capacity to meet the obligations and where the risk of default is very low. Accordingly, no loss allowance for impairment has been recognised.

(ii) Financial assets for which loss allowance is measured using life time expected credit losses

The Company provides loss allowance on trade receivables using life time expected credit loss and as per simplified approach.

c) Ageing of trade receivables

The Ageing of trade receivables is as below:

(Rs. In Lakhs)					
Ageing	0-180 days	181-365 days	1-2 years	2-5 years	Total
Gross Carrying amount as on 31.03.2021	-	2,309.99	-	-	2,309.99
Impairment loss recognised on above	-	-	-	-	-
Gross Carrying amount as on 31.03.2020	-	1,720.07	-	-	1,720.07
Impairment loss recognised on above	-	-	-	-	-
Gross Carrying amount as on 01.04.2019	-	3,110.99	-	-	3,110.99
Impairment loss recognised on above	-	-	-	-	-

ii) 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.

The following are the contractual maturities of financial liabilities based on contractual cash flows.

Contractual Maturities of Financial Liabilities	Less than 1 Year	1-2 years	Total
As at 31.03.2021			
Borrowing	921.48	33.57	955.05
Trade payable	288.68	-	288.68
Other financial liabilities	48.80	-	48.80
Total	1,258.97	33.57	1,292.54



Notes to the financial statements for the year ended 31st March, 2021 (Contd.)

Contractual Maturities of Financial Liabilities As at 31.03.2020	Less than 1 Year	1-2 years	Total
Borrowing	951.79	43.81	995.60
Trade payable	93.19	-	93.19
Other financial liabilities	16.08	-	16.08
Total	1,061.06	43.81	1,104.87

Contractual Maturities of Financial Liabilities As at 01.04.2019	Less than 1 Year	1-2 years	Total
Borrowing	2,864.94	69.82	2,934.77
Trade payable	570.31	-	570.31
Other financial liabilities	2.53	-	2.53
Total	3,437.78	69.82	3,507.60

iii) Market Risk

Market Risk mainly relates to the investment & deposits. There is no regular business of company for making investment & deposits. However, company manages the cash resources, borrowings strategies and ensuring compliance of the same with the guidelines & directions of the Higher Management.

A) Foreign currency risk

The company operates business as a Importer / Exporter of various goods and domestically in which therefore there may be foreign currency risk arise.

B) Interest Rate Risk

Interest rate risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rate. In order to optimize the Company's position with regards to interest income and interest expenses and to manage the interest rate risk, treasury performs a comprehensive corporate interest rate risk management by balancing the proportion of fixed rate and floating rate financial instruments in its total portfolio.

Note no.37 Disclosure as per Ind AS 113 'Fair Value Measurement'

Fair valuation techniques

The Company maintains policies and procedures to value financial assets or financial liabilities using the best and most relevant data available. The fair values of the financial assets and liabilities are included at the amount that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.

Fair Value Hierarchy

All financial assets and liabilities for which fair value is measured in the financial statements are categorised within the fair value hierarchy, described as follows:

Level 1 - Quoted prices in active markets.

Level 2 - Inputs other than quoted prices included within Level 1 that are observable, either directly or indirectly.

Level 3 - Inputs that are not based on observable market data.

The following methods and assumptions were used to estimate the fair values:

- 1) Fair value of cash and deposits, trade receivables, trade payables, and other current financial assets and liabilities approximate their carrying amounts largely due to the short-term maturities of these instruments.
- 2) Fair value of borrowings from banks and other non-current financial liabilities, are estimated by discounting future cash flows using rates currently available for debt on similar terms and remaining maturities
- 3) Other non-current receivables are evaluated by the Company, based on parameters such as interest rates, individual creditworthiness of the counterparty etc. Based on this evaluation, allowances are taken to account for the expected losses of these receivables



Notes to the financial statements for the year ended 31st March, 2021 (Contd.)

A) Financial Instruments By Category			
Particulars	31.03.2021		
	FVTPL	FVTOCI	Amortized cost
Financial Assets:			
Investments			
Equity instrument	-	-	52.55
Trade Receivables	-	-	2,309.99
Loan	-	-	58.85
Cash and Cash Equivalents	-	-	1.85
Bank balances other than cash and cash equivalent	-	-	-
Other Financial Assets	-	-	93.28
Total Financial Assets	-	-	2,516.52
Financial Liability:			
Borrowings	-	-	955.05
Trade Payables	-	-	288.68
Other Financial Liabilities	-	-	48.80
Total Financial Liability	-	-	1,292.54
Particulars	31.03.2020		
	FVTPL	FVTOCI	Amortized cost
Financial Assets:			
Investments			
Equity instrument	-	-	-
Trade Receivables	-	-	1,720.07
Loan	-	-	-
Cash and Cash Equivalents	-	-	336.82
Bank balances other than cash and cash equivalent	-	-	-
Other Financial Assets	-	-	21.39
Total Financial Assets	1,236.34	4,347.75	2,078.29
Financial Liability:			
Borrowings	-	-	995.60
Trade Payables	-	-	93.19
Other Financial Liabilities	-	-	16.08
Total Financial Liability	-	-	1,104.87
Particulars	01.04.2019		
	FVTPL	FVTOCI	Amortized cost
Financial Assets:			
Investments			
Equity instrument	-	-	-
Trade Receivables	-	-	3,110.99
Loan	-	-	-
Cash and Cash Equivalents	-	-	279.16
Bank balances other than cash and cash equivalent	-	-	-
Security deposit	-	-	-
Other Financial Assets	-	-	50.04
Total Financial Assets	-	-	3,440.19
Financial Liability:			
Borrowings	-	-	2,934.77
Trade Payables	-	-	570.31
Other Financial Liabilities	-	-	2.53
Total Financial Liability	-	-	3,507.60



Notes to the financial statements for the year ended 31st March, 2021 (Contd.)

C) Fair value of financial assets and liabilities measured at amortised cost			
Particulars	As at 31 March 2021		
	Level	Carrying Value	Fair Value
Financial Assets			
Investments		52.55	52.55
Trade receivables	3	2,309.99	2,309.99
Loans	3	58.85	58.85
Cash and cash equivalents	3	1.85	1.85
Other Bank Balances	3	-	-
Other Financial Assets	3	93.28	93.28
Financial Liabilities			
Borrowings	3	955.05	955.05
Trade payables	3	288.68	288.68
Other-Financial Liabilities	3	48.80	48.80
Particulars	As at 31 March 2020		
	Level	Carrying Value	Fair Value
Financial Assets			
Trade receivables	3	1,720.07	1,720.07
Loans	3	-	-
Cash and cash equivalents	3	336.82	336.82
Other Bank Balances	3	-	-
Other Financial Assets	3	21.39	21.39
Financial Liabilities			
Borrowings	3	995.60	995.60
Trade payables	3	93.19	93.19
Other-Financial Liabilities	3	16.08	16.08
Particulars	As at 1st April 2019		
	Level	Carrying Value	Fair Value
Financial Assets			
Trade receivables	3	3,110.99	3,110.99
Loans	3	-	-
Cash and cash equivalents	3	279.16	279.16
Other Bank Balances	3	-	-
Other Financial Assets	3	50.04	50.04
Financial Liabilities			
Borrowings	3	2,934.77	2,934.77
Trade payables	3	570.31	570.31
Other-Financial Liabilities	3	2.53	2.53



Note No. 38. First Time adoption of Ind AS

These are the company's first standalone financial statements prepared in accordance with Ind AS for period up to and including the year ended 31 March 2021. Until 31st March, 2020, the company prepared its first financial statement in accordance with previous GAAP, including accounting standards notified under the companies (Accounting standards) Rules, 2006 (as amended). The effective date for companies Ind AS Opening Balance sheet is 1 April 2019. (The date of transition to Ind AS)

The accounting policies set out in note 1 have been applied in preparing the financial statements for the year ended 31 March 2021, the comparative information presented in these financial statements for the year ended 31 March, 2020 and in the preparation of an opening Ind AS balance sheet at 01 April, 2019. In preparing its opening Ind AS balance sheet, the Company has adjusted the amounts reported previously in financial statements prepared in accordance with the accounting standards notified under Companies (Accounting Standards) Rules, 2016 (as amended) and other relevant provisions of the Act (previous GAAP or Indian GAAP). An explanation of how the transition from previous GAAP to Ind AS has affected the company financial position, financial performance.

Any resulting differences between carrying amount of assets and liabilities, if any, according to Ind AS 101 as of April 1 2019 compared to those presented in the Indian GAAP Balance Sheet as of 31 March 2019, were recognised in the equity under retained earnings with Ind AS Balance Sheet.

Exemptions and Exceptions availed

The Company has prepared the financial statements in accordance with IND AS for the year ending 31 March 2021. In preparing such statements the opening balance sheet was prepared at 1 April 2019, the company's date of transition to IND AS. The note explain principal; adjustments made in order to restate its Indian GAAP financial statements including the balance sheet as at 1 April 2019 and financial statements as at and for the year end 31 March 2020.

Set out below are the applicable Ind AS 101 optional exemptions and mandatory exceptions applied in the transition from previous GAAP to Ind AS.

EXEMPTIONS:

i) Property, Plant & Equipment

IndAS 101 permits a first time adopter to elect to continue with the carrying value for all of its property, plant and equipment as recognised in financial statement as at date on transition to IndAS, measured as the previous GAAP and use that as its deemed cost as at date of transition.

Accordingly Company has elected to measure all of its Property, Plant and Equipment at their previous GAAP carrying value.

EXCEPTIONS:

i) Estimates

An entity's estimates in accordance with Ind AS at the date of transition to Ind AS shall be consistent with estimates made for the same date in accordance with previous GAAP (after adjustments to reflect any difference in accounting policies), unless there is objective evidence that those estimates were in error.

Ind AS estimates as at 1 April 2019 are consistent with the estimates as at the same date made in conformity with previous GAAP. The company made estimates for following items in accordance with the Ind AS at date of transition as these were not required under previous GAAP.

ii) Classification and Measurement of financial assets

Ind AS 101 requires an entity to assess classification and measurement of financial assets on the basis of the facts and circumstances that exist at the date of transition to Ind AS.



Reconciliations between previous GAAP and Ind AS

Ind AS 101 requires an entity to reconcile equity, total comprehensive income and cash flows for prior periods. The following tables represent the reconciliations from previous GAAP to Ind AS.

Reconciliation of equity as at 1 April 2019 and 31 March 2020

Particulars	Note No.	31-Mar-20			01-Apr-19		
		Previous GAAP	Adjustments	Ind ASs	Previous GAAP	Adjustments	Ind ASs
ASSETS							
NON-CURRENT ASSETS							
Property, Plant and Equipment		87.08	-	87.08	860.49	-	860.49
Capital Work-In-Progress		-	-	-	-	-	-
Intangible Assets		-	-	-	-	-	-
Financial Assets		-	-	-	-	-	-
Investments		-	-	-	-	-	-
Other Financial Assets		3.71	-	3.71	15.82	-	15.82
Other Non-Current Assets		22.92	-	22.92	38.07	-	38.07
Total Non current assets		113.71	-	113.71	914.38	-	914.38
CURRENT ASSETS							
Inventories		304.64	-	304.64	1,089.50	-	1,089.50
Financial Assets		-	-	-	-	-	-
Investments		-	-	-	-	-	-
Trade Receivables		1,720.07	-	1,720.07	3,110.99	-	3,110.99
Cash and Cash Equivalents		336.82	-	336.82	279.16	-	279.16
Bank balances other than cash and cash equivalent		-	-	-	-	-	-
Other Financial Assets		17.68	-	17.68	34.23	-	34.23
Current Tax Asset (Net)		-	-	-	-	-	-
Other Current Assets		648.48	-	648.48	536.53	-	536.53
Total Current Assets		3,027.69	-	3,027.69	5,050.41	-	5,050.41
Total Assets		3,141.39	-	3,141.39	5,964.78	-	5,964.78
EQUITY AND LIABILITIES							
EQUITY							
Equity Share Capital		662.01	-	662.01	662.01	-	662.01
Other Equity	(c)	1,307.07	-	1,307.07	1,198.52	-	1,198.52
Total Equity		1,969.08	-	1,969.08	1,860.53	-	1,860.53
LIABILITIES							
NON-CURRENT LIABILITIES							
Financial Liabilities							
a) Borrowings		43.81	-	43.81	69.82	-	69.82
Deferred Tax Liabilities (Net)	(a)	29.22	-	29.22	22.44	-	22.44
Other Non Current Liabilities		-	-	-	-	-	-
Total Non Current Liabilities		73.03	-	73.03	92.27	-	92.27
CURRENT LIABILITIES							
Financial Liabilities							
Borrowings		951.79	-	951.79	2,864.94	-	2,864.94
Trade Payables		93.19	-	93.19	570.31	-	570.31
Other Financial Liabilities		16.08	-	16.08	2.53	-	2.53
Other Current Liabilities		0.65	-	0.65	529.06	-	529.06
Provisions		1.47	-	1.47	14.43	-	14.43
Current Tax Liabilities (Net)		36.10	-	36.10	30.72	-	30.72
Total current liabilities		1,099.28	-	1,099.28	4,011.99	-	4,011.99
Total Equity and Liabilities		3,141.39	-	3,141.39	5,964.78	-	5,964.78

*The previous GAAP figures have been reclassified to conform to Ind AS presentation requirement for the purpose of this note.



Reconciliation of total comprehensive income for the ended 31st March 2020

Particulars	Note No.	Previous GAAP	Adjustments	Ind ASs
REVENUE				
Revenue from Operations	(e)	6,647.29	9.64	6,637.65
Other Income		322.78	-	322.78
Total Revenue		6,970.07	9.64	6,960.43
EXPENSES				
Cost of Materials Consumed		5,192.14	-	5,192.14
Changes in Inventories of Finished Goods, Stock-In-Trade and Work-in-Progress		784.86	-	784.86
Employee Benefits Expense	(b)	93.33	-	93.33
Finance Costs		131.38	-	131.38
Depreciation and Amortisation Expense		57.60	-	57.60
Other Expenses	(e)	559.34	9.64	549.70
Total Expenses		6,818.64	9.64	6,809.00
Profit before Tax		151.43	-	151.43
(1) Current tax				
Current Year		36.10	-	36.10
Earlier years		-	-	-
(2) Deferred tax	(a)	6.78	-	6.78
(3) Mat Credit Entitlement		-	-	-
Total Tax Expenses		42.88	-	42.88
Profit after Tax		108.55	-	108.55
Other Comprehensive Income				
(A) i) Items that will not be reclassified to profit or loss	(d)			
a) Remeasurement of defined benefit obligations	(b)	-	-	-
Income tax relating to these items		-	-	-
b) Change in fair value of investment in equities carried at fair value through OCI		-	-	-
Income tax relating to these items		-	-	-
Other Comprehensive Income for the Year (Net of Tax)		-	-	-
Total Comprehensive Income for the period		108.55	-	108.55

*The previous GAAP figures have been reclassified to conform to Ind AS presentation requirement for the purpose of this note.

Reconciliation of total equity as at 31 March 2020 and 1 April 2019

Particulars	31.03.2020	01.04.2019
Total equity shareholder fund as per previous GAAP	1,969.08	1,860.53
Adjustments		
Depreciation and amortisation	-	-
Fair value of Quoted investment	-	-
Tax relating on valuation of Equity instrument	-	-
Fair value of Unquoted investment	-	-
Tax relating on valuation of Mutual fund	-	-
Total Adjustment	-	-
Total equity as per Ind AS	1,969.08	1,860.53



Reconciliation of total comprehensive income for the year ended 31 March 2020

Particulars	31.03.2020
Profit after tax as per previous GAAP	108.55
Adjustment:	
Depreciation and amortisation	-
Valuation of investment through FVTPL (Marked to market)	-
Income tax relating to such item	-
Gain/Loss on sale of equity instrument transfer to OCI	-
Income tax relating to such item	-
Actuarial loss on defined benefit plan recognised in OCI (net of tax)	-
Total Adjustment	-
Profit after tax as per Ind AS	108.55
Other comprehensive income (net of tax)	
Actuarial Gain/loss on defined benefit obligation (Net of tax)	-
Fair value/ Gain on sale of investment	-
Income tax relating to fair value measurement/ gain on sale of equity instrument	-
Total comprehensive income as per Ind AS	108.55

Notes to Reconciliation

a) Deferred Tax

Under Previous GAAP, deferred tax is calculated using the income statement approach, which focuses on differences between accounting profits and taxable profits for the period. Under Ind AS, deferred tax is accounted using the balance sheet approach, which focuses on temporary differences between the carrying amount of the assets or liabilities in the balance sheet and its tax base. The resulting changes in the amount of deferred tax is recognised in deferred tax liability on the date of transition and subsequently in Statement of Profit and loss for those items relating to Profit & loss and in other comprehensive income for those which are classified through FVTOCI.

b) Employee Benefits

Both under Indian GAAP and IND AS, the company recognized costs related to its post employment defined benefits plan on an actuarial basis. Under Indian GAAP the entire cost including actuarial gain/loss are charged to profit or loss. Under IND AS, Remeasurements are recognized in Other Comprehensive Income.

c) Other Equity

Retained Earnings as at 1 April 2019 has been adjusted to the above IND AS transition adjustments. Refer 'Reconciliation of Total Equity' as at 31 March 2020 and 1 April 2019' as given above.

d) Other Comprehensive Income

Under Indian GAAP the company has not presented Other Comprehensive Income separately. Hence Indian GAAP profit or loss is reconciled to total comprehensive income.

e) Trade discount and Volume rebate

Under Previous GAAP, Trade discounts and volume rebates received are not encompassed within the definition of revenue, since they represent a reduction of cost. Under IND AS, Trade discount and volume rebate cover in definition of Revenue so it is deducted from sales.

For AKG EXIM LIMITED

As per our report of even date

For Sharma Sharma & Co.

Chartered Accountants

F.R.N.: 009462N

CA Suvir Sharma

Partner

M.No.: 088272

Place : Gurugram

Date: 29-06-2021



Managing Director

Mahima Goel

(Managing Director)

DIN: 02205003

For AKG EXIM LIMITED

Pragati Mittal

Company Secretary

Membership No. A58202

For and on behalf of the Board of Directors
AKG Exim Limited

For AKG EXIM LIMITED

Rahul Bajaj

(Executive Director & CFO) **C.F.O.**

DIN: 03408766



Independent Auditor's Report

To the Members of AKG Exim Limited

Report on the Audit of the Consolidated Financial Statements

Opinion

We have audited the accompanying consolidated financial statements of AKG Exim Limited (hereinafter referred to as the 'Holding Company') and its subsidiaries (Holding Company and its subsidiaries together referred to as "the Group"), which comprise the consolidated Balance Sheet as at 31st March 2021, and the consolidated statement of Profit and Loss, and the consolidated cash flows Statement for the year then ended, and notes to the consolidated financial statements, including a summary of significant accounting policies (hereinafter referred to as "the consolidated financial statements").

In our opinion and to the best of our information and according to the explanations given to us, the aforesaid consolidated financial statements give the information required by the Act in the manner so required and give a true and fair view in conformity with the accounting principles generally accepted in India, of the consolidated state of affairs of the Company as at 31st March 2021, of consolidated profit/loss and its consolidated cash flows for the year then ended.

Basis for Opinion

We conducted our audit in accordance with the Standards on Auditing (SAs) specified under section 143(10) of the Companies act, 2013. 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 Group in accordance with the Code of Ethics issued by ICAI, and we have fulfilled our other ethical responsibilities in accordance with the provisions of the Companies Act, 2013. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Information other than the financial statements and auditors' report thereon

The Holding Company's management and Board of Directors are responsible for the other information. The other information comprises the information included in the Holding Company's annual report, but does not include the consolidated 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 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 in the audit or otherwise appears to be materially misstated.

If, based on the work we have performed and based on the work done/ audit report of other auditor, 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 Holding Company's Board of Directors is responsible for the preparation and presentation of these consolidated financial statements in term of the requirements of the Companies Act, 2013 that give a true and fair view of the consolidated financial position, consolidated financial performance and consolidated cash flows of the Group in accordance with the accounting principles generally accepted in India, including the Accounting Standards specified under section 133 of the Act. The respective Board of Directors of the companies included in the Group are responsible for maintenance of

adequate accounting records in accordance with the provisions of the Act for safeguarding the assets of the Group and for preventing and detecting frauds and other irregularities; selection and application of appropriate accounting policies; making judgments 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 financial statements by the Directors of the Holding Company, as aforesaid.

In preparing the consolidated financial statements, the respective Board of Directors of the companies included in the Group are responsible for assessing the ability of the Group 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 Group or to cease operations, or has no realistic alternative but to do so.

The respective Board of Directors of the companies included in the Group are responsible for overseeing the financial reporting process of the Group.

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

- Identify and assess the risks of material misstatement of the 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 control relevant to the audit in order to design audit procedures that are appropriate in the circumstances. Under section 143(3)(i) of the Companies Act, 2013, we are also responsible for expressing our opinion on whether the company has adequate internal financial controls system in place and the operating effectiveness of such controls.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by 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 Group 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 Group 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 appropriate audit evidence regarding the financial information of the entities or business activities within the Group 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 Holding 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.

Other Matters

(a) We did not audit the financial statements of 1 subsidiary, whose financial statements reflect total assets, total revenues and net cash flows for the year ended March 31, 2021, as considered in the consolidated financial statements. These financial statements are out of the ambit of audit as per the respective laws applicable on them and our opinion on the consolidated financial statements, in so far as it relates to the amounts and disclosures included in respect of this subsidiary and our report in terms of sub-section (3) of Section 143 of the Act, in so far as it relates to the aforesaid subsidiary is based solely on the financial statements provided by the management.

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

As required by Section 143 (3) of the Act, we report that:

- a) We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purposes of our audit of the aforesaid consolidated financial statements.
- b) In our opinion, proper books of account as required by law relating to preparation of the aforesaid consolidated financial statements have been kept so far as it appears from our examination of those books and the reports of the other auditors.
- c) The Consolidated Balance Sheet, the Consolidated Statement of Profit and Loss, and the Consolidated Cash Flow Statement dealt with by this Report are in agreement with the relevant books of account maintained for the purpose of preparation of the consolidated financial statements.
- d) In our opinion, the aforesaid consolidated financial statements comply with the Accounting Standards specified under Section 133 of the Act.

The Company migrated from SME Platform to the Main Board platform of NSE Ltd w.e.f. February 16, 2021 and hence based relevant provisions of Ind AS and Press Release issued by the Ministry of Corporate Affairs, dated January 2, 2015, the Company has to follow Companies (Indian Accounting Standards) Rules, 2015 [Ind-AS Rules] for the first time from the subsequent Financial Year i.e FY 2021-22.

- e) On the basis of the written representations received from the directors of the Holding Company as on 31st March 2021 taken on record by the Board of Directors of the Holding Company and the reports of the statutory auditors of its subsidiary companies, none of the directors of the Group companies is disqualified as on 31st March 2021 from being appointed as a director in terms of Section 164(2) of the Act.
- f) With respect to the adequacy of internal financial controls over financial reporting of the Group and the operating effectiveness of such controls, refer to our separate report in Annexure A.
- g) With respect to the matter to be included in the Auditor's Report under section 197(16), In our opinion and according to the information and explanations given to us, the remuneration paid by the Company to its directors during the current year is in accordance with the provisions of section 197 of the Act. The remuneration paid to any director is not in excess of the limit laid down under section 197 of the Act. The Ministry of Corporate Affairs has not prescribed other details under section 197(16) which are required to be commented upon by us.
- 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 Auditor's) Rules, 2014, in our opinion and to the best of our information and according to the explanations given to us:

- a. The consolidated financial statements disclose the impact of pending litigations on the consolidated financial position of the Group.
- b. The Group did not have any material foreseeable losses on long-term contracts including derivative contracts.
- c. There were no amounts which were required to be transferred to the Investor Education and Protection Fund by the Holding Company, and its subsidiary companies.

For SharmaSharma & Co.
Chartered Accountants
FRN: 0009462N



Suvir Sharma
(Partner)
Membership No. 088272

Place:-New Delhi
Date: June 29, 2021
UDIN:21088272AAAADX8455

Report on Internal Financial Controls with reference to financial statements

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

We have audited the internal financial controls over financial reporting of AKG Exim Limited ("the Company") as of March 31, 2021 in conjunction with our audit of the consolidated financial statements of the Company and its subsidiary companies for the year ended on that date.

Management's Responsibility for Internal Financial Controls

The respective Board of Directors of the Parent and its subsidiary companies, are responsible for establishing and maintaining internal financial controls based on the internal control over financial reporting criteria established by the respective Companies considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India ("ICAI"). These responsibilities include the design, implementation and maintenance of adequate internal financial controls that were operating effectively for ensuring the orderly and efficient conduct of its business, including adherence to 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 internal financial controls over financial reporting of the Parent and its subsidiary companies, 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") issued by the Institute of Chartered Accountants of India and the Standards on Auditing, prescribed under Section 143(10) of the Companies Act, 2013, to the extent applicable to an audit of internal financial controls. 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 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 and the audit evidence obtained by auditors of the subsidiary companies, 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 internal financial controls system over financial reporting of the Parent and its subsidiary companies.

Meaning of Internal Financial Controls Over Financial Reporting

A company's internal financial control over financial reporting is a process designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles. A company's internal financial control over financial reporting includes those policies and procedures that

1. pertain to the maintenance of records that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the assets of the company;
2. provide reasonable assurance that transactions are recorded as necessary to permit preparation of financial statements in accordance with generally accepted accounting principles, and that receipts and expenditures of the company are being made only in accordance with authorisations of management and directors of the company; and
3. provide reasonable assurance regarding prevention or timely detection of 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, to the best of our information and according to the explanations given to us and based on the consideration of the report of the internal auditor, the Parent and its subsidiary companies, have, 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, 2021, based on the criteria for internal financial control over financial reporting established by the respective companies 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.

However, the clerical errors which were rectified then and there during the course of our audit and other matters, which in our opinion are not material, have not been dealt with in this report.

For SharmaSharma & Co.
Chartered Accountants
FRN: 0009462N




Suvir Sharma
(Partner)
Membership No. 088272

Place:-New Delhi
Date: June 29, 2021
UDIN:21088272AAAADX8455

AKG EXIM LIMITED
CIN: L00063DL2005PLC139045
Consolidated Balance Sheet as at 31 March, 2021

Particulars	Notes	As at 31st March 2021	As at 31st March 2020	As at 1st April 2019
Assets				
Non-current Assets				
Property, plant and equipment	2	78.99	87.08	860.49
Capital work in progress		108.47	-	-
Financial Assets				
Investments	3	-	-	-
Loans	4	-	-	-
Other Financial Assets	4	4.61	3.71	15.82
Other Non -Current Assets	5	15.15	22.92	38.07
Total Non Current Assets		207.21	113.71	914.38
Current Assets				
Inventories	6	317.83	304.64	1,089.50
Financial Assets				
Investments		-	-	-
Trade receivables	7	2,340.36	1,720.07	3,110.99
Loans	8	0.00	-	-
Cash and cash equivalent	9	9.67	336.82	279.16
Other Bank Balances		-	-	-
Other Financial Assets	10	88.67	17.68	34.23
Current Tax Assets (Net)		-	-	-
Other Current Assets	11	595.98	648.48	536.53
Total Current Assets		3,352.53	3,027.69	5,050.41
Total Assets		3,559.74	3,141.39	5,964.78
Equity and Liabilities				
Equity				
Equity Share Capital	12	1,059.22	662.01	662.01
Other Equity	13	1,050.81	1,307.07	1,198.52
Non-controlling interests		12.35	-	-
Total Equity		2,122.37	1,969.08	1,860.53
Non-current Liabilities				
Financial Liabilities				
a) Borrowings	14	33.57	43.81	69.82
Deferred Tax Liabilities (net)	15	29.64	29.22	22.44
Other-Non-current Liabilities		-	-	-
Total Non Current Liabilities		63.21	73.03	92.27
Current Liabilities				
Financial Liabilities				
Borrowings	16	971.79	951.79	2,864.94
Trade payables-	17	-	-	-
Total Outstanding dues of micro enterprises and small enterprises		-	-	-
Total Outstanding dues of creditors other than micro enterprises and small enterprises	18	302.99	93.19	570.31
Other-Financial Liabilities	19	48.80	16.08	2.53
Other Current Liabilities	19	1.58	0.65	529.06
Provisions	20	11.28	1.47	14.43
Current Tax Liabilities (net)	21	37.72	36.10	30.72
Total Current Liabilities		1,374.16	1,099.28	4,011.99
Total Equity and Liabilities		3,559.74	3,141.39	5,964.78

Statement of significant accounting policies 1
The accompanying notes are integral part of the financial statements.

As per our report of even date
For Sharma Sharma & Co.
Chartered Accountants
F.R.N.: 009462N

CA Suvir Sharma
Partner
M.No.: 088272
UDIN: 21058272AAAADW7694

Date: 29-06-2021
Place : Gurugram



For AKG EXIM LIMITED

For and on behalf of the Board of Directors
AKG Exim Limited

Mahima Coel
Managing Director
(Managing Director)
DIN: 02205003

Rahul Bajaj
Rahul Bajaj
(Executive Director & CFO)
DIN: 03408766

C.F.O.

Pragati Parthika
Pragati Parthika
Company Secretary
Membership No. A58202

AKG EXIM LIMITED
CIN: L00063DL2005PLC139045
Consolidated Statement of Profit and Loss for the year ended 31 March, 2021

Particulars	Notes	Year Ended 31st March-2021	Year Ended 31st March-2020
INCOME			
Revenue from operations	22	10,438.18	6,637.65
Other income	23	19.72	322.78
Total Income (I)		10,457.90	6,960.43
EXPENSES			
Cost of Materials Consumed		-	-
Purchases of Stock in Trade	24	9,808.93	5,192.14
Changes in inventories of finished good & work-inprogress	25	(13.20)	784.86
Employee benefits expenses	26	58.08	93.33
Finance costs	27	89.30	131.38
Depreciation and amortization expens	2	17.46	57.60
Other expenses	28	320.36	549.70
Total expenses (II)		10,280.94	6,809.00
Profit/(loss) before tax (III) = (I-II)		176.96	151.43
Tax expense			
(1) Current tax	30		
Current Year		37.72	36.10
Earlier years		-	-
(2) Deferred tax		0.42	6.78
(3) Mat Credit Entitlement		-	-
Total Tax Expenses (IV)		38.14	42.88
Profit After Tax (V) = (III)-(IV)		138.82	108.55
Other Comprehensive Income			
Items that will not be reclassified to profit & loss			
a) Remeasurement of defined benefit obligations		-	-
Income tax relating to these items		-	-
Items that will be reclassified to profit & loss			
Exchange differences on translating the financial statements of foreign subsidiary		(0.11)	-
Income tax relating to these items		(0.11)	-
Other Comprehensive Income for the year, net of tax (VI)		(0.11)	-
Total Comprehensive Income for the year (VII) = (V+VI)		138.71	108.55
Profit attributable to:			
Owners of the Company		141.06	-
Non-controlling interests		(2.35)	-
Earnings per share			
Weighted average number of Ordinary Shares outstanding during the year			
Basic		1,05,92,192	66,20,120
Diluted		1.01	1.64
		1.01	1.64

Statement of significant accounting policies 1
The accompanying notes are integral part of the financial statements.

As per our report of even date

For Sharma Sharma & Co.
Chartered Accountants
F.R.N.: 009162N

CA Suviz Sharma
Partner
M.No.: 085272
UDIN: 21088272AAAADW7654



Date: 29-06-2021
Place: Gurugram

For AKG EXIM LIMITED For and on behalf of the Board of Directors
For AKG EXIM LIMITED
AKG Exim Limited

Mahima Goel
Managing Director
Mahima Goel
(Managing Director)
DIN: 02205003

Rahul Bajaj
C.F.O.
Rahul Bajaj
(Executive Director & CFO)
DIN: 03408766

Pragati Parnika
Pragati Parnika
Pragati Parnika
Company Secretary
Membership No. A58202

AKG EXIM LIMITED
CIN: L00063DL2005PLC139045
Consolidated Statement Of Cashflow for the year ended 31 March, 2021

(Amount in Rupees)

Particulars	As at 31st March, 2021	As at 31st March 2020
A. CASH FLOW FROM OPERATING ACTIVITY		
Net Profit Before Tax as per Statement of Profit and Loss	176.96	151.43
Adjustments to reconcile profit before tax to net cash flows:		
Depreciation and impairment of property, plant and equipment	17.46	57.60
Preliminary Expenses W/o	7.77	7.77
Net Gain/Loss on disposal of property, plant and equipment	-	(274.09)
Interest income	(1.79)	(32.43)
Finance costs	89.30	131.38
PPE written off	0.16	4.06
Provision for doubtful debts, advances, deposits and others	-	-
Cash generated from operations before working capital changes	289.85	45.71
Working capital adjustments:		
Increase/decrease in trade receivables	(620.29)	1,390.92
Increase/decrease in non current financial assets	(0.90)	12.10
Increase/decrease in loan	(0.00)	-
Increase/decrease in non current assets	-	7.38
Increase/decrease in Investment	-	-
Increase/decrease in other current financial assets	(70.99)	16.55
Increase/decrease in other current assets	52.49	(111.94)
Increase/decrease in inventory	(13.20)	784.86
Increase/decrease in other current financial liabilities	32.72	13.55
Increase/ decrease in other current liabilities	0.71	(528.41)
Increase/decrease in trade payables	209.80	(477.12)
Increase/decrease in non current liabilities	-	-
Increase/decrease in current provisions	9.80	(12.96)
Cash generated from operation	(110.00)	1,140.65
Income tax paid	(36.10)	(30.72)
Net cash flows from operating activities (A)	(146.10)	1,109.93
B. CASH FLOW FROM INVESTING ACTIVITY		
Proceeds from sale of property, plant and equipment	-	1,006.84
Purchase of property, plant and equipment including CWIP	(117.99)	(21.00)
Purchase of non current investment	-	-
Purchase/Sale of current investment	-	-
Interest received	1.79	32.43
Net cash flows used in investing activities (B)	(116.20)	1,018.27
C. CASH FLOW FROM FINANCING ACTIVITY		
Proceeds from Issue of Share Capital	397.21	-
Share premium	(397.21)	-
Proceeds from subsidiary Interests to the non controlling Interest	14.70	-
Proceeds from / (Repayment of) Short Term Borrowings/long term borrowing	9.75	(1,939.17)
Interest Paid	(89.30)	(131.38)
Net cash flows from/(used in) financing activities (C)	(64.85)	(2,070.54)
Net increase in cash and cash equivalents(A+B+C)	(327.15)	57.66
Cash and cash equivalents at the beginning of the year	336.82	279.16
Cash and cash equivalents at year end	9.67	336.82

Notes:

(i) The above Statement of Cash Flows has been prepared under the 'Indirect Method' as set out in Ind AS 7, 'Statement of Cash Flows'.

(ii) Previous year figures have been regrouped / rearranged to make them comparable, wherever considered necessary, with those of the current year.

For AKG EXIM LIMITED

For AKG EXIM LIMITED

As per our report of even date

For Sharma Sharma & Co.

Chartered Accountants

F.R.N.: 009462N

CA Suvig Sharma
Partner

M.No.: 088272

Place: Gurugram

Date: 29-06-2021



For AKG EXIM LIMITED

Mahima Goel
(Managing Director)
DIN: 02205003

Pragati Parthiva
Company Secretary

Membership No. A58202

For and on behalf of the Board of Directors

Rahul Bajaj
C.F.O.

(Executive Director & CFO)
DIN: 03408766

AKG EXIM LIMITED
CIN: L00063DL2005PLC139045

Notes to Consolidated financial statements for the year ended 31st March, 2021
STATEMENT OF CHANGES IN EQUITY

A. Equity Share Capital

For the year ended 31st March,2020

Balance as at 1st April 2019	Changes in equity share capital during the year	Balance as at 31st March 2020
662.01	-	662.01

For the year ended 31st March 2021

Balance as at 1st April 2020	Changes in equity share capital during the year	Balance as at 31st March 2021
662.01	397.21	1,059.22

B. Other Equity

For the year ended 31st March 2021

Particulars	Reserve and surplus				Total
	Securities Premium	General Reserve	Retained Earnings	FCTR	
Balance at the beginning of the reporting year-01-04-2020	778.89	75.33	452.85		1,307.07
Less: Bonus Issue of Shares	(397.21)				(397.21)
Profit for the year	-	-	141.06		141.06
Other comprehensive income	-	-	-		-
Item of other income that will be classified to profit and loss account	-	-	-	(0.11)	(0.11)
Total Comprehensive Income for the Year	381.68	75.33	593.91		1,050.81
Transfer to General Reserve	-	-	-	-	-
Balance at the end of the reporting year-31.03.2021	381.68	75.33	593.91		1,050.81

For the year ended 31st March 2020

Particulars	Reserve and surplus				Total
	Securities Premium	General Reserve	Retained Earnings		
Balance at the beginning of the reporting year-01-04-2019	778.89	75.33	344.30		1,198.52
Profit for the year	-	-	108.55		108.55
Other comprehensive income	-	-	-		-
Total Comprehensive Income for the Year	778.89	75.33	452.85		1,307.07
Transfer to General Reserve	-	-	-		-
Balance at the end of the reporting year-31.03.2020	778.89	75.33	452.85		1,307.07



Notes to Consolidated financial statements for the year ended 31st March, 2021

2. NON CURRENT ASSETS : PROPERTY, PLANT AND EQUIPMENT

As at 31st March 2021

Particulars	GROSS BLOCK			ACCUMULATED DEPRECIATION			NET BLOCK			
	As at 1st April 2020	Additions	Disposals	As at 31st March 2021	As at 1st April 2020	Depreciation charged during the year	Deductions	As at 31st March 2021	Net Carrying Amount as on 31.03.21	Net Carrying Amount as on 31.03.20
Land	-	-	-	-	-	-	-	-	-	-
Buildings	108.47	-	-	108.47	64.61	2.00	-	66.61	41.86	43.86
Plant and Machinery	2.65	-	-	2.65	1.68	0.37	-	2.05	0.60	0.97
Furniture and Fittings	0.15	7.47	-	7.63	0.12	0.01	-	0.13	7.49	0.03
Vehicles	71.88	-	-	71.88	33.99	13.29	-	47.28	24.60	37.89
Office Equipments	10.61	2.05	0.16	12.51	6.29	1.79	-	8.08	4.44	4.33
Total	193.76	9.53	0.16	203.13	106.68	17.46	-	124.14	78.99	87.08
Capital Work-in-Progress	-	-	-	-	-	-	-	-	-	-
Total	193.76	10	0	203.13	106.68	17.46	-	124.14	78.99	87.08

As at 31st March 2020

Particulars	GROSS BLOCK			ACCUMULATED DEPRECIATION			NET BLOCK			
	As at 1st April 2019	Additions	Disposals	As at 31st March 2020	As at 1st April 2019	Depreciation charged during the year	Deductions	As at 31st March 2020	Net Carrying Amount as on 31.03.2020	Net Carrying Amount as on 01.04.2019
Land	132.76	-	132.76	-	-	-	-	-	-	132.76
Buildings	692.74	15.70	599.97	108.47	32.43	32.18	-	64.61	43.86	660.31
Plant and Machinery	1.82	4.89	4.06	2.65	0.25	1.43	-	1.68	0.97	0.02
Furniture and Fittings	0.15	-	-	0.15	0.08	0.04	-	0.12	0.03	0.07
Vehicles	71.88	-	-	71.88	13.46	20.53	-	33.99	37.89	58.42
Office Equipments	10.23	0.41	0.02	10.61	2.86	3.43	-	6.29	4.33	8.92
Total	909.57	21.00	736.82	193.76	49.08	57.60	-	106.68	87.08	860.49
Capital Work-in-Progress	-	-	-	-	-	-	-	-	-	-
Total	909.57	21.00	736.82	193.76	49.08	57.60	-	106.68	87.08	860.49

Notes:

2.1 For Property, Plant and Equipment existing as on 1st April 2019, i.e. the date of transition to Ind AS for the company, the company has considered previous GAAP (i.e., IGAAP) carrying value as deemed cost as per the option available under para D7AA of Ind AS 101 "First Time Adoption".

The net carrying value of assets comprises of:

Particulars	Land	Buildings	Non Factory Building	Plant and Machinery	Furniture and Fittings	Vehicles	Office Equipments	Total
Cost/Deemed cost as at April 1, 2019	132.76	660.31	-	0.02	0.07	58.42	8.92	860.49
Accumulated depreciation	-	-	-	-	-	-	-	-
Carrying Value as on 01.04.2019	132.76	660.31	-	0.02	0.07	58.42	8.92	860.49

Notes to Consolidated financial statements for the year ended 31st March, 2021

NOTE NO.3 NON CURRENT FINANCIAL ASSETS : INVESTMENTS

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Equity instruments (fully paid-up-unless otherwise stated) Unquoted (designated at Amortised Cost)			
(a) BKS Metalics Private Limited, Neemrana, Rajasthan	-	-	-
(b) ASRI Trade Pte. Ltd. (Singapore)	-	-	-
TOTAL	-	-	-
Aggregate amount of quoted investments and market value thereof	-	-	-
Aggergate amount of Unquoted Investment	-	-	-

4. NON CURRENT ASSETS - OTHER FINANCIAL ASSETS

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Security Deposits	4.61	3.71	15.82
TOTAL	4.61	3.71	15.82

5. NON CURRENT ASSETS - OTHER NON CURRENT ASSETS

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Prepaid Expenses	15.15	22.92	38.07
Others	-	-	-
TOTAL	15.15	22.92	38.07

6. CURRENT ASSETS - INVENTORIES

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
(As valued and certified by the Management)			
Finished Goods	317.83	304.64	1,089.50
TOTAL	317.83	304.64	1,089.50

7. CURRENT FINANCIAL ASSETS - TRADE RECEIVABLE

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Trade Receivable			
Unsecured, considered good	2,340.36	1,720.07	3,110.99
Less: Loss allowance	-	-	-
Total	2,340.36	1,720.07	3,110.99
Total Trade Receivables	2,340.36	1,720.07	3,110.99



8. CURRENT FINANCIAL ASSETS - SHORT TERM LOANS

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Unsecured, considered good	0.00	-	-
Total	0.00	-	-

9. CURRENT FINANCIAL ASSET- CASH AND CASH EQUIVALENT

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Balances With Banks :			
Cash-in-hand	4.43	2.42	7.79
In Current/Cash Credit Account	5.14	238.22	(0.10)
Fixed Deposit (LC/ Margin Money)	0.10	96.18	271.47
Total	9.67	336.82	279.16

10. CURRENT FINANCIAL ASSET- OTHER CURRENT FINANCIAL ASSETS

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Advance recoverable in cash or kind or for value to be received	88.67	-	22.61
Interest Accrue but not due on FDR's	-	17.68	11.62
Total	88.67	17.68	34.23

11. CURRENT ASSET- OTHER CURRENT ASSETS

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Advance To Suppliers	286.08	411.57	189.18
Prepaid Expenses	1.28	1.05	1.48
Statutory and Other Receivables	308.62	235.87	345.87
Total	595.98	648.48	536.53



AKG EXIM LIMITED
CIN: L00063DL2005PLC139045

Notes to Consolidated financial statements for the year ended 31st March, 2021

12. EQUITY SHARE CAPITAL

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Authorised Share Capital			
1,00,00,000 (Previous year 1,00,00,000) Equity Shares of Rs. 10/- each	1,000	1,000	1,000
	1,000	1,000	1,000
Issued , Subscribed and Paid-up Share Capital			
1,05,92,192 (Previous year 66,20,120) Equity Share of Rs. 10/- each fully paid up	1,059.22	662.01	662.01
	1,059.22	662.01	662.01

12.1 Reconciliation of the number of shares at the beginning and at the end of the year

There has been no charge/ movements in number of shares outstanding at the beginning and at the end of the year.

12.2 Terms/ Rights attached to Equity Shares :

The Company has only one class of issued shares i.e., Ordinary Shares having par value of `10 per share. Each holder of the Ordinary Shares is entitled to one vote per share . In the event of liquidation, the ordinary shareholders are eligible to receive the remaining assets of the Company after payment of all preferential amounts, in proportion to their shareholding.

12.3 Shareholding Pattern with respect of Holding or Ultimate Holding Company

The Company does not have any Holding Company or Ultimate Holding Company.

12.4 Details of Equity Shareholders holding more than 5% shares in the Company.

Name of the Shareholder	As at March 31, 2021		As at March 31, 2020		As at April 1, 2019	
	No. of Shares	% Holding	No. of Shares	% Holding	No. of Shares	% Holding
RAJEEV GOEL	1,87,072	1.76%	30,80,920	46.54%	30,80,920	63.65%
MAHIMA GOEL	69,90,400	65.89%	15,29,000	23.10%	15,29,000	31.59%
MULTIPLEX CAPITAL LIMITED	3,47,498	3.28%	6,28,000	9.49%	-	-

13. OTHER EQUITY

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Securities Premium Account	381.68	778.89	778.89
General Reserve	75.33	75.33	75.33
Capital Redemption Reserve	-	-	-
Retained Earnings	593.91	452.85	344.30
Other comprehensive income			
Other Reserves	-	-	-
Item of other income that will be classified to profit and loss account	(0.11)	-	-
Total	1,050.81	1,307.07	1,198.52

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Securities Premium Account			
Balance at the beginning of the year	778.89	778.89	405.09
Add: Additions during the year	-	-	373.80
Less: Bonus Issue of Shares	(397.21)	-	-
Balance at the end of the year	381.68	778.89	778.89
General Reserve			
Balance at the beginning of the year	75.33	75.33	75.33
Add: Transferred from Retained Earnings	-	-	-
Balance at the end of the year	75.33	75.33	75.33
Capital Redemption Reserve			
Opening Balance	-	-	-
Add: Addition during the year	-	-	-
Balance at the end of the year	-	-	-



Retained Earnings			
Balances at the beginning of the year	452.85	344.30	242.70
Add: Profit for the year	141.06	108.55	108.30
Transferred from /to reserve	-	-	(6.70)
Net actuarial gain/loss on defined benefit plan, net of tax	-	-	-
Add: Reclassification of financial instruments from OCI to Retained Earnings	-	-	-
	593.91	452.85	344.30
Items of other comprehensive income recognised directly in retained earnings	-	-	-
Net actuarial gain/loss on defined benefit plan, net of tax	-	-	-
Balance at the end of the year	593.91	452.85	344.30
Other Reserves			
Equity instrument through Other Comprehensive Income			
Balance at the beginning	-	-	-
Balance at the end of the year	-	-	-
Total Reserve & Surplus	1,050.92	1,307.07	1,198.52

14. NON CURRENT FINANCIAL LIABILITIES- BORROWINGS

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
From Banks	33.57	43.81	49.12
Other Loans			
From Banks	-	-	20.70
	33.57	43.81	69.82
The above amount includes			
Secured Borrowings (Refer note 16.1)	33.57	43.81	69.82
Unsecured Borrowings	-	-	-
Net tax assets/liabilities	33.57	43.81	69.82

15. NON CURRENT LIABILITIES- DEFERRED TAX LIABILITIES (NET)

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Arising on account of :			
Accelerated Depreciation on Property, Plant & Equipment	29.64	29.22	22.44
Others	-	-	-
	29.64	29.22	22.44
Less: Deferred Tax Assets			
Arising on account of :			
Others	-	-	-
	-	-	-
Deferred Tax Liabilities (Net)	29.64	29.22	22.44

Movement in Deferred Tax Balances
31st March 2021

Particulars	Net balance 01.04.2020	Recognise in Profit & Loss	Recognised in OCI	Net balance 31.03.2021
Difference in book depreciation & tax depreciation	29.22	0.42	-	29.64
Others	-	-	-	-
Tax assets/liabilities	29.22	0.42	-	29.64
Less : Deferred assets for deferred tax liability	-	-	-	-
Net tax assets/liabilities	29.22	0.42	-	29.64

31st March 2020

Particulars	Net balance 01.04.2019	Recognise in Profit & Loss	Recognised in OCI	Net balance 31.03.2020
Difference in book depreciation & tax depreciation	22.44	6.78	-	29.22
Others	-	-	-	-
Tax (assets)/liabilities	22.44	6.78	-	29.22
Less : Deferred assets for deferred tax liability	-	-	-	-
Net tax (assets)/liabilities	22.44	6.78	-	29.22



16. CURRENT FINANCIAL LIABILITIES- BORROWINGS

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Loans Repayable on Demand			
From Banks	853.41	951.79	2,858.90
Other Loans			
From Others / Banks	118.37	-	6.05
	971.79	951.79	2,864.94
The above amount includes			
Secured Borrowings (Refer note below)	971.79	951.79	2,864.94
Unsecured Borrowings	-	-	-
Total	971.79	951.79	2,864.94

Nature of security

Note no. 20.1 Working capital borrowings are secured charge by way of hypothecation on Book debts; Floating charge; Movable property (not being pledge); Ex ch for CC, LER and LC and 2nd charge for WCTL on first pari passu basis.

17. CURRENT FINANCIAL LIABILITIES- TRADE PAYABLES

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Trade Payables for goods and services			
Total outstanding dues of micro, small and medium enterprises	-	-	-
Others- Trade Payables for goods and services	302.99	93.19	570.31
Total	302.99	93.19	570.31

18. OTHER CURRENT FINANCIAL LIABILITIES

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Expenses Payable	48.80	16.08	2.53
Total	48.80	16.08	2.53

19. CURRENT LIABILITIES- OTHER CURRENT LIABILITIES

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Statutory dues	1.58	0.65	2.72
TDS Payable	-	-	-
Others advances from customer	-	-	526.34
Total	1.58	0.65	529.06

20. CURRENT LIABILITIES- PROVISION

Particulars	As at March 31, 2021	As at March 31, 2017	As at April 1, 2016
Provision for Employee Benefits	11.28	1.47	14.43
Provision for Taxation	-	-	-
Total	11.28	1.47	14.43

21. CURRENT TAX LIABILITIES (NET)

Particulars	As at March 31, 2021	As at March 31, 2020	As at April 1, 2019
Provision For Tax Deducted At Source	37.72	36.10	30.72
Total	37.72	36.10	30.72



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Notes to Consolidated financial statements for the year ended 31st March, 2021

22. REVENUE FROM OPERATIONS

Particulars	Year Ended 31st March 2021	Year Ended 31st March 2020
Sale of traded goods (Refer Note below (i))	10,620.61	6,647.29
Less: Discount allowed/Claim Paid/Received	116.11	9.64
	10,504.51	6,637.65
Note (i)		
Traded goods	10,339.12	6,351.96
Comission	-	86.52
Domestic Consultancy Services	58.55	199.16
Export Consultancy Services	40.51	-
	10,438.18	6,637.65
Total	10,438.18	6,637.65

23. OTHER INCOME

Particulars	Year Ended 31st March 2021	Year Ended 31st March 2020
Interest Income		
On Banks Deposits	1.79	32.43
On Other	-	-
Dividend Income		
On Long-term investment	-	-
On Current investment	-	-
(Gain)/ Loss on fair valuation of investment through FVTPL	-	-
Other Non Operating Income		
Gain on sale/ discard of Fixed Assets (Net)	-	-
Excess Provision written back	-	-
Net Gain/(Loss) on Foreign currency transaction and translation *	-	-
Excess Depreciation written back	-	-
Miscellaneous Income	17.93	290.35
Sundry Balance Written Off	-	-
Total	19.72	322.78

24. Purchases of stock-in-trade

Particulars	Year Ended 31st March 2021	Year Ended 31st March 2020
Purchase of Traded Goods	9,808.93	5,197.61
Less: Discount received	-	(5.47)
	9,808.93	5,192.14



Notes to the financial statements for the year ended 31st March, 2021 (Contd.)

25. (INCREASE)/ DECREASE IN INVENTORIES OF FINISHED GOODS, WORK-IN-PROGRESS

Particulars	Year Ended 31st March 2021	Year Ended 31st March 2020
Inventories at the beginning of the year Finished Goods	304.64	1,089.50
Inventories at the end of the year Finished Goods	317.83	304.64
Total	(13.20)	784.86

26. EMPLOYEE BENEFITS EXPENSE

Particulars	Year Ended 31st March 2021	Year Ended 31st March 2020
Salaries & Wages	55.31	87.60
Contribution to Provident and Other Funds	2.17	3.93
Staff Welfare Expenses	0.60	1.80
Total	58.08	93.33

27. FINANCE COST

Particulars	Year Ended 31st March 2021	Year Ended 31st March 2020
Interest Expenses To Banks on Working Capital Loans	89.30	125.55
On Deposits and Others	-	5.83
Other Borrowing Costs Other Financial Charges	-	-
Total	89.30	131.38

28. OTHER EXPENSES

Particulars	Year Ended 31st March 2021	Year Ended 31st March 2020
Annual Listing Fee (NSE)	3.66	-
Audit fees (Refer Note (i) below)	1.30	0.80
Bank charges	4.32	26.90
Conveyance expenses	2.95	1.65
Business Promotion	2.96	8.79
Advertisement	0.53	0.36
Electricity expenses	9.66	8.44
Freight charges	7.77	106.10
Insurance expenses	1.72	2.25
Freight and Cartage Outward	1.54	10.05
Legal and professional charges	24.62	6.82
Commission on Sale	30.31	12.79
Maintenance Charges	3.41	12.46
News Papers & Periodicals Expenses	-	0.03
Miscellaneous expenses	54.19	3.33
Postage and courier charges	0.04	0.55
Festival Celebration Expenses	0.16	-
Printing and stationary	0.53	0.69
Rent	17.30	4.94
Short & Excess Amount W/o	0.02	0.02
Telephone expenses	4.35	5.26
Membership / Subscription Fees	0.87	0.35
Expenses related to Rice business	-	4.27



Notes to the financial statements for the year ended 31st March, 2021 (Contd.)

Donation	-	1.00
Travelling expenses	0.75	16.60
Vehicle repair and maintenance	4.42	5.09
Rates & Taxes	4.09	8.67
Listing Expenses (SME)	-	0.15
Shipping and Clearing Expenses	53.65	190.65
Packing Expenses	-	-
Custom Duty on Import	15.43	50.02
Preliminary Expenses W/o	7.77	7.77
Gain/Loss on Foreign Currency Transactions and Translations		
Directors Sitting Fee	30.00	10.38
Directors Remuneration	3.10	2.00
Computer & Software Expenses	24.00	37.50
Website Expenses	0.48	1.53
Filing Fee Expenses	1.16	1.49
Repair & Maintenance General	3.22	-
Repair & Maintenance General	0.10	-
Total	320.36	549.70

28.1 Details in respect of Auditors' Remuneration

Statutory Auditors

Audit Fees	1.05	0.55
Tax Audit Fees	0.25	0.25
Total	1.30	0.80



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Notes to Consolidated financial statements for the year ended 31st March, 2021

Note no. 29. Disclosure as per Ind AS 2 'Inventories'

Inventory purchased have been recognised as expense. The details are as under:

Particulars	2020-21	2019-20
Purchase of Traded Goods	9,808.93	5,192.14
Total	9,808.93	5,192.14

Note no 30. Disclosure as per Ind AS 12 'Income Tax'

a) Income Tax Expense

i) Income Tax recognised in statement of profit & loss account.

Particulars	2020-21	2019-20
Current Tax Expenses		
Current year	37.72	36.10
Adjustment for earlier year	-	-
Total current Tax expenses	37.72	36.10
Deferred Tax Expenses	0.42	6.78
Mat Credit Entitlement	-	-
Total Income tax expenses	38.14	42.88

ii) Income tax recognised in other comprehensive income

Particular	2020-21			2019-20		
	Before tax	Tax expense/ Benefit	Net of tax	Before tax	Tax expense/ Benefit	Net of tax
-Net actuarial gain/loss on defined benefit plan	-	-	-	-	-	-
- Net gain/loss on fair value of equity instrument	-	-	-	-	-	-

iii) Reconciliation of tax expense and accounting profit multiplied by india's domestic rate

Particulars	2020-21	2019-20
Profit before tax		
Tax using the domestic tax rate	176.96	151.43
Tax effect of :	27.82%	27.820%
Non deductible tax expenses	0.42	6.78
Deductable tax expenses	37.72	36.10
Total tax expenses in the statement of profit and loss account	38.14	42.88

Note no. 31. Disclosure as per Ind AS 19 'Employee Benefit'

Employee Benefits" the company paid short term benefits which fall due wholly within 12 months after the end of the period in which the employee renders the related service. Long term benefits are recorded when they are paid.

Note 32 Disclosure as per Ind AS 108-Segment Reporting

In accordance with the requirements of INDAS 108- "Segment Reporting" issued by The Institute of Chartered Accountant of India, The Company has reportable business or geographical segment.

Note no. 33. Disclosure as per Ind AS 24 'Related party Disclosures'

A) List of related party

i) Parties holding significant influence

M/s AKG Engineers Private Limited

M/s A. K Gupta & Co.

ii) Key Management Personnel

Mr. Rajeev Goel
Mrs. Mahima Goel
Mr. Rahul Bajaj
Ms. Simpal Singh (Resigned)
Ms. Pragati Parnika



iii) Relatives of the Key Management Personnel

Notes to the financial statements for the year ended 31st March, 2021 (Contd.)

Mr. Sanjeev Goel
Mr. Aakash Goel
Mrs. Renu Goel

b) The following transactions were carried out with the related parties during the year :-

i) Related Parties / Parties Holding Significant Influence

Particulars	2020-21	2019-20
(A) Expenses		
Import Purchases		
ASRI Trade Pte. Ltd.	28.71	-
Rent		
AKG Engineers Private Limited	14.20	-
Remuneration		
Mr. Rajeev Goel	9.60	24.00
Mrs. Mahima Goel	14.40	17.00
Mr. Rahul Bajaj	4.95	1.20
Directors Sitting Fee		
Mr. Rakesh Mohan	1.05	1.00
Mr. Laxman Singh Rao	1.05	1.00
Mr. Kartik Guglani	1.05	0.25
(B) Income		
Consultancy Services		
Scrap Sales Revenue		
AKG Engineers Private Limited	-	98.34
A.K Gupta & Co.	-	163.89

ii) Key Management Personnel Compensation

There is no transaction other than managerial remuneration paid as per terms of appointment duly approved by the shareholders. Following are the details of such managerial remuneration:

Particulars	2020-21	2019-20
1) Short Term Employee Benefits		
Salaries & Allowances	32.10	44.45
Contribution to Provident Fund	-	-
Others- perquisites value	-	-
Commission on Profit to the Managing Director & CFO	-	-
2) Post Employment Benefits	0.25	-
3) Other Long Term Benefits	-	-
Total	32.35	44.45

The above does not include gratuity provision as the same is on overall company basis.

Terms and conditions:

All the transactions were made on normal commercial terms and conditions and at market rates. All outstanding balances are unsecured and are repayable in cash.



Notes to the financial statements for the year ended 31st March, 2021 (Contd.)

Note no. 34. Disclosure as per Ind AS 33 'Earning Per Share'

Earning Per Share

Particulars	Units	For the year ended March 31, 2021	For the year ended March 31, 2020
Equity Shares			
Basic net earnings per share Attributable to Shareholders For BEPS/DEPS	Rs. Lakhs	138.82	108.55
Weighted average no shares for BEPS/DEPS	No.	1,05,92,192	66,20,120
Basic Earnings per share/Diluted Earning Per Share	Rs.	1.01	1.64

35 Contingent liabilities to the extent not provided for in respect of

Particulars	2020-21	2019-20
(A) Claims against company not acknowledged as Debts:-		
(i) Income Tax matters in appeals	-	-
(ii) Service Tax demand not admitted by the company and for which appeals have been filed with appropriate authorities.	-	-
(iii) Excise duty demand not admitted by the company and for which appeals have been filed with appropriate authorities.	-	-
(B) Guarantees:-		
(i) Letter of Credit against purchase of raw materials	-	-
(ii) Bonds Executed with Customs & Excise Authorities	-	-
(iii) Bank Guarantees	-	-

(iii) Commitments--NIL

Note no. 36 Disclosure as per Ind AS 107 'Financial instrument disclosure'

A) Capital management

For the purpose of Company's Capital Management, Capital includes issued equity share capital and borrowings excluding working capital loans from various financial institutions. The primary objective of Company's Capital Management is to maximize shareholder's value and to maintain an appropriate capital structure of debt and equity. The company manages its capital structure and makes adjustments in the light of changes in economic environment and the requirements of financial covenants.

Equity share capital and other equity are considered for the purpose of Company's capital management. The Company manages its capital so as to safeguard its ability to continue as a going concern and to optimise returns to shareholders. The capital structure of the Company is based on management's judgement of its strategic and day-to-day needs with a focus on total equity so as to maintain investor, creditors and market confidence. The management and the Board of Directors monitors the return on capital as well as the level of dividends to shareholders. The Company may take appropriate steps in order to maintain, or if necessary adjust, its capital structure.

Particulars	Year ended March 31, 2021	Year ended March 31, 2020	Year ended 1 April, 2019
Interest-bearing loans and borrowings	1,005.35	995.60	2,934.77
Less: cash and bank balance (including other bank balance)	9.67	336.82	279.16
Net Debt	995.68	658.78	2,655.61
Equity share capital	1,059.22	662.01	662.01
Other equity	1,050.81	1,307.07	1,198.52
Total Capital	2,110.03	1,969.08	1,860.53
Capital and Net debt	3,105.71	2,627.86	4,516.14
Gearing Ratio	32.06%	25.07%	58.80%

B) Financial risk management

The Company's Financial Risk Management is an integral part of how to plan and execute its business strategies. The Company's financial risk management is set by the Managing Board. The Company's principal financial liabilities comprise loans and borrowings, trade payables and other payables. The main purpose of these financial liabilities is to finance the company's operations. The company's principal financial assets include trade & other receivables and cash and short term deposits.



Notes to the financial statements for the year ended 31st March, 2021 (Contd.)

Risk			
Credit Risk	Trade receivables	Ageing analysis, Credit Ratings	Credit limits, Escrow Cover, letters of credit
	Financial assets measured at Amortised cost and cash & cash equivalents	Credit ratings	
Liquidity risk	Borrowing and other liabilities	Rolling cash flows forecast	Availability of committed credit lines and borrowing facilities
Market risk-Interest rate risk	Long-term Borrowings at variable rates	Sensitivity analysis, Cash Flow Analysis	Different kinds of loan arrangements with varied terms (eg. Fixed, floating, rupee, foreign currency, etc.) & swapping of high cost debts into low cost debt.

(i) Credit risk

Credit risk is the risk of financial loss to the Company if a customer or counterparty to a financial instrument fails to meet its contractual obligations resulting in a financial loss to the Company. Credit risk arises principally from trade receivables, loans & advances.

Provision for Expected Credit or Loss

(i) Financial assets for which loss allowance is measured using 12 month expected credit losses.

The Company has assets where the counter-parties have sufficient capacity to meet the obligations and where the risk of default is very low. Accordingly, no loss allowance for impairment has been recognised.

(ii) Financial assets for which loss allowance is measured using life time expected credit losses

The Company provides loss allowance on trade receivables using life time expected credit loss and as per simplified approach.

c) Ageing of trade receivables

The Ageing of trade receivables is as below:

Ageing					(Rs. In Lakhs)
	0-180 days	181-365 days	1-2 years	2-5 years	Total
Gross Carrying amount as on 31.03.2021	-	2,340.36	-	-	2,340.36
Impairment loss recognised on above	-	-	-	-	-
Gross Carrying amount as on 31.03.2020	-	1,720.07	-	-	1,720.07
Impairment loss recognised on above	-	-	-	-	-
Gross Carrying amount as on 01.04.2019	-	3,110.99	-	-	3,110.99
Impairment loss recognised on above	-	-	-	-	-

ii) 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.

The following are the contractual maturities of financial liabilities based on contractual cash flows.

Contractual Maturities of Financial Liabilities	Less than 1 Year	1-2 years	Total
As at 31.03.2021			
Borrowing	971.79	33.57	1,005.35
Trade payable	302.99	-	302.99
Other financial liabilities	48.80	-	48.80
Total	1,323.58	33.57	1,357.15



Notes to the financial statements for the year ended 31st March, 2021 (Contd.)

Contractual Maturities of Financial Liabilities As at 31.03.2020	Less than 1 Year	1-2 years	Total
Borrowing	951.79	43.81	995.60
Trade payable	93.19	-	93.19
Other financial liabilities	16.08	-	16.08
Total	1,061.06	43.81	1,104.87

Contractual Maturities of Financial Liabilities As at 01.04.2019	Less than 1 Year	1-2 years	Total
Borrowing	2,864.94	69.82	2,934.77
Trade payable	570.31	-	570.31
Other financial liabilities	2.53	-	2.53
Total	3,437.78	69.82	3,507.60

iii) Market Risk

Market Risk mainly relates to the investment & deposits. There is no regular business of company for making investment & deposits. However, company manages the cash resources, borrowings strategies and ensuring compliance of the same with the guidelines & directions of the Higher Management.

A) Foreign currency risk

The company operates business as a Importer / Exporter of various goods and domestically in which therefore there may be foreign currency risk arise.

B) Interest Rate Risk

Interest rate risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rate. In order to optimize the Company's position with regards to interest income and interest expenses and to manage the interest rate risk, treasury performs a comprehensive corporate interest rate risk management by balancing the proportion of fixed rate and floating rate financial instruments in its total portfolio.

Note no.37 Disclosure as per Ind AS 113 'Fair Value Measurement'

Fair valuation techniques

The Company maintains policies and procedures to value financial assets or financial liabilities using the best and most relevant data available. The fair values of the financial assets and liabilities are included at the amount that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.

Fair Value Hierarchy

All financial assets and liabilities for which fair value is measured in the financial statements are categorised within the fair value hierarchy, described as follows:

Level 1 - Quoted prices in active markets.

Level 2 - Inputs other than quoted prices included within Level 1 that are observable, either directly or indirectly.

Level 3 - Inputs that are not based on observable market data.

The following methods and assumptions were used to estimate the fair values:

- 1) Fair value of cash and deposits, trade receivables, trade payables, and other current financial assets and liabilities approximate their carrying amounts largely due to the short-term maturities of these instruments.
- 2) Fair value of borrowings from banks and other non-current financial liabilities, are estimated by discounting future cash flows using rates currently available for debt on similar terms and remaining maturities
- 3) Other non-current receivables are evaluated by the Company, based on parameters such as interest rates, individual creditworthiness of the counterparty etc. Based on this evaluation, allowances are taken to account for the expected losses of these receivables

A) Financial Instruments By Category

Particulars	31.03.2021		
	FVTPL	FVTOCI	Amortized cost
Financial Assets:			
Investments			
Equity instrument	-	-	-
Trade Receivables	-	-	2,340.36



Notes to the financial statements for the year ended 31st March, 2021 (Contd.)

Loan	-	-	0.00
Cash and Cash Equivalents	-	-	9.67
Bank balances other than cash and cash equivalent	-	-	-
Other Financial Assets	-	-	93.28
Total Financial Assets	-	-	2,443.32
Financial Liability:			
Borrowings	-	-	1,005.35
Trade Payables	-	-	302.99
Other Financial Liabilities	-	-	48.80
Total Financial Liability	-	-	1,357.15

Particulars	31.03.2020		
	FVTPL	FVTOCI	Amortized cost
Financial Assets:			
Investments			
Equity instrument	-	-	-
Trade Receivables	-	-	1,720.07
Loan	-	-	-
Cash and Cash Equivalents	-	-	336.82
Bank balances other than cash and cash equivalent	-	-	-
Other Financial Assets	-	-	21.39
Total Financial Assets	1,236.34	4,347.75	2,078.29
Financial Liability:			
Borrowings	-	-	995.60
Trade Payables	-	-	93.19
Other Financial Liabilities	-	-	16.08
Total Financial Liability	-	-	1,104.87

Particulars	01.04.2019		
	FVTPL	FVTOCI	Amortized cost
Financial Assets:			
Investments			
Equity instrument	-	-	-
Trade Receivables	-	-	3,110.99
Loan	-	-	-
Cash and Cash Equivalents	-	-	279.16
Bank balances other than cash and cash equivalent	-	-	-
Security deposit	-	-	-
Other Financial Assets	-	-	50.04
Total Financial Assets	-	-	3,440.19
Financial Liability:			
Borrowings	-	-	2,934.77
Trade Payables	-	-	570.31
Other Financial Liabilities	-	-	2.53
Total Financial Liability	-	-	3,507.60



Notes to the financial statements for the year ended 31st March, 2021 (Contd.)

C) Fair value of financial assets and liabilities measured at amortised cost

Particulars	As at 31 March 2021		
	Level	Carrying Value	Fair Value
Financial Assets			
Investments		-	-
Trade receivables	3	2,340.36	2,340.36
Loans	3	0.00	0.00
Cash and cash equivalent	3	9.67	9.67
Other Bank Balances	3	-	-
Other Financial Assets	3	93.28	93.28
Financial Liabilities			
Borrowings	3	1,005.35	1,005.35
Trade payables	3	302.99	302.99
Other-Financial Liabilities	3	48.80	48.80

Particulars	As at 31 March 2020		
	Level	Carrying Value	Fair Value
Financial Assets			
Trade receivables	3	1,720.07	1,720.07
Loans	3	-	-
Cash and cash equivalent	3	336.82	336.82
Other Bank Balances	3	-	-
Other Financial Assets	3	21.39	21.39
Financial Liabilities			
Borrowings	3	995.60	995.60
Trade payables	3	93.19	93.19
Other-Financial Liabilities	3	16.08	16.08

Particulars	As at 1st April 2019		
	Level	Carrying Value	Fair Value
Financial Assets			
Trade receivables	3	3,110.99	3,110.99
Loans	3	-	-
Cash and cash equivalent	3	279.16	279.16
Other Bank Balances	3	-	-
Other Financial Assets	3	50.04	50.04
Financial Liabilities			
Borrowings	3	2,934.77	2,934.77
Trade payables	3	570.31	570.31
Other-Financial Liabilities	3	2.53	2.53



Note No. 38. First Time adoption of Ind AS

These are the company's first Consolidated financial statements prepared in accordance with Ind AS for period up to and including the year ended 31 March 2021. Until 31st March 2020, the company prepared its first financial statement in accordance with previous GAAP, including accounting standards notified under the Companies (Accounting standards) Rules, 2006 (as amended). The effective date for companies Ind AS Opening Balance sheet is 1 April 2019. (The date of transition to Ind AS)

The accounting policies set out in note 1 have been applied in preparing the financial statements for the year ended 31 March 2021, the comparative information presented in these financial statements for the year ended 31 March, 2020 and in the preparation of an opening Ind AS balance sheet at 01 April, 2019. In preparing its opening Ind AS balance sheet, the Company has adjusted the amounts reported previously in financial statements prepared in accordance with the accounting standards notified under Companies (Accounting Standards) Rules, 2016 (as amended) and other relevant provisions of the Act (previous GAAP or Indian GAAP). An explanation of how the transition from previous GAAP to Ind AS has affected the company financial position, financial performance.

Any resulting differences between carrying amount of assets and liabilities, if any, according to Ind AS 101 as of April 1 2019 compared to those presented in the Indian GAAP Balance Sheet as of 31 March 2019, were recognised in the equity under retained earnings with Ind AS Balance Sheet.

Exemptions and Exceptions availed

The Company has prepared the financial statements in accordance with IND AS for the year ending 31 March 2021. In preparing such statements the opening balance sheet was prepared at 1 April 2019, the company's date of transition to IND AS. The note explain principal adjustments made in order to restate its Indian GAAP financial statements including the balance sheet as at 1 April 2019 and financial statements as at and for the year end 31 March 2020.

Set out below are the applicable Ind AS 101 optional exemptions and mandatory exceptions applied in the transition from previous GAAP to Ind AS.

EXEMPTIONS:

i) Property, Plant & Equipment

IndAS 101 permits a first time adopter to elect to continue with the carrying value for all of its property, plant and equipment as recognised in financial statement as at date on transition to IndAS, measured as the previous GAAP and use that as its deemed cost as at date of transition.

Accordingly Company has elected to measure all of its Property, Plant and Equipment at their previous GAAP carrying value.

EXCEPTIONS:

i) Estimates

An entity's estimates in accordance with Ind AS at the date of transition to Ind AS shall be consistent with estimates made for the same date in accordance with previous GAAP (after adjustments to reflect any difference in accounting policies), unless there is objective evidence that those estimates were in error.

Ind AS estimates as at 1 April 2019 are consistent with the estimates as at the same date made in conformity with previous GAAP. The company made estimates for following items in accordance with the Ind AS at date of transition as these were not required under previous GAAP.

ii) Classification and Measurement of financial assets

Ind AS 101 requires an entity to assess classification and measurement of financial assets on the basis of the facts and circumstances that exist at the date of transition to Ind AS.

Reconciliations between previous GAAP and Ind AS

Ind AS 101 requires an entity to reconcile equity, total comprehensive income and cash flows for prior periods. The following tables represent the reconciliations from previous GAAP to Ind AS.



Reconciliation of equity as at 1 April 2019 and 31 March 2020

Particulars	Note No.	31-Mar-20			01-Apr-19		
		Previous GAAP	Adjustments	Ind ASs	Previous GAAP	Adjustments	Ind ASs
ASSETS							
NON-CURRENT ASSETS							
Property, Plant and Equipment		87.08	-	87.08	860.49	-	860.49
Capital Work-In-Progress		-	-	-	-	-	-
Intangible Assets		-	-	-	-	-	-
Financial Assets		-	-	-	-	-	-
Investments		-	-	-	-	-	-
Other Financial Assets		3.71	-	3.71	15.82	-	15.82
Other Non-Current Assets		22.92	-	22.92	38.07	-	38.07
Total Non current assets		113.71	-	113.71	914.38	-	914.38
CURRENT ASSETS							
Inventories		304.64	-	304.64	1,089.50	-	1,089.50
Financial Assets		-	-	-	-	-	-
Investments		-	-	-	-	-	-
Trade Receivables		1,720.07	-	1,720.07	3,110.99	-	3,110.99
Cash and Cash Equivalents		336.82	-	336.82	279.16	-	279.16
Bank balances other than cash and cash equivalent		-	-	-	-	-	-
Other Financial Assets		17.68	-	17.68	34.23	-	34.23
Current Tax Asset (Net)		-	-	-	-	-	-
Other Current Assets		648.48	-	648.48	536.53	-	536.53
Total Current Assets		3,027.69	-	3,027.69	5,050.41	-	5,050.41
Total Assets		3,141.39	-	3,141.39	5,964.78	-	5,964.78
EQUITY AND LIABILITIES							
EQUITY							
Equity Share Capital		662.01	-	662.01	662.01	-	662.01
Other Equity	(c)	1,307.07	-	1,307.07	1,198.52	-	1,198.52
Total Equity		1,969.08	-	1,969.08	1,860.53	-	1,860.53
LIABILITIES							
NON-CURRENT LIABILITIES							
Financial Liabilities							
a) Borrowings		43.81	-	43.81	69.82	-	69.82
Deferred Tax Liabilities (Net)	(a)	29.22	-	29.22	22.44	-	22.44
Other Non Current Liabilities		-	-	-	-	-	-
Total Non Current Liabilities		73.03	-	73.03	92.27	-	92.27
CURRENT LIABILITIES							
Financial Liabilities							
Borrowings		951.79	-	951.79	2,864.94	-	2,864.94
Trade Payables		93.19	-	93.19	570.31	-	570.31
Other Financial Liabilities		16.08	-	16.08	2.53	-	2.53
Other Current Liabilities		0.65	-	0.65	529.06	-	529.06
Provisions		1.47	-	1.47	14.43	-	14.43
Current Tax Liabilities (Net)		36.10	-	36.10	30.72	-	30.72
Total current liabilities		1,099.28	-	1,099.28	4,011.99	-	4,011.99
Total Equity and Liabilities		3,141.39	-	3,141.39	5,964.78	-	5,964.78

*The previous GAAP figures have been reclassified to conform to Ind AS presentation requirement for the purpose of this note.



Reconciliation of total comprehensive income for the ended 31st March 2020

Particulars	Note No.	Previous GAAP	Adjustments	Ind ASs
REVENUE				
Revenue from Operations	(e)	6,647.29	9.64	6,637.65
Other Income		322.78	-	322.78
Total Revenue		6,970.07	9.64	6,960.43
EXPENSES				
Cost of Materials Consumed		5,192.14	-	5,192.14
Changes in Inventories of Finished Goods, Stock-In-Trade and Work-in-Progress		784.86	-	784.86
Employee Benefits Expense	(b)	93.33	-	93.33
Finance Costs		131.38	-	131.38
Depreciation and Amortisation Expense		57.60	-	57.60
Other Expenses	(e)	559.34	9.64	549.70
Total Expenses		6,818.64	9.64	6,809.00
Profit before Tax		151.43	-	151.43
(1) Current tax				
Current Year		36.10	-	36.10
Earlier years		-	-	-
(2) Deferred tax				
(3) Mat Credit Entitlement	(a)	6.78	-	6.78
Total Tax Expenses		42.88	-	42.88
Profit after Tax		108.55	-	108.55
Other Comprehensive Income				
(A) i) Items that will not be reclassified to profit or loss				
a) Remeasurement of defined benefit obligations	(b)	-	-	-
Income tax relating to these items		-	-	-
b) Change in fair value of investment in equities carried at fair value through OCI		-	-	-
Income tax relating to these items		-	-	-
Other Comprehensive Income for the Year (Net of Tax)		-	-	-
Total Comprehensive Income for the period		108.55	-	108.55

*The previous GAAP figures have been reclassified to conform to Ind AS presentation requirement for the purpose of this note.

Reconciliation of total equity as at 31 March 2020 and 1 April 2019

Particulars	31.03.2020	01.04.2019
Total equity shareholder fund as per previous GAAP	1,969.08	1,860.53
Adjustments		
Depreciation and amortisation	-	-
Fair value of Quoted investment	-	-
Tax relating on valuation of Equity instrument	-	-
Fair value of Unquoted investment	-	-
Tax relating on valuation of Mutual fund	-	-
Total Adjustment	-	-
Total equity as per Ind AS	1,969.08	1,860.53

Reconciliation of total comprehensive income for the year ended 31 March 2020

Particulars	31.03.2020
Profit after tax as per previous GAAP	108.55
Adjustment:	
Depreciation and amortisation	-
Valuation of investment through FVTPL (Marked to market)	-
Income tax relating to such item	-
Gain/Loss on sale of equity instrument transfer to OCI	-
Income tax relating to such item	-
Actuarial loss on defined benefit plan recognised in OCI (net of tax)	-
Total Adjustment	-
Profit after tax as per Ind AS	108.55
Other comprehensive income (net of tax)	
Actuarial Gain/loss on defined benefit obligation (Net of tax)	-
Fair value/ Gain on sale of investment	-
Income tax relating to fair value measurement/gain on sale of equity instrument	-
Total comprehensive income as per Ind AS	108.55



Note -1

Group Overview, Basis of Preparation and Significant Accounting Policies

1.1. Group Overview

The Group, AKG Exim Limited (Parent) and its subsidiaries as follows:

1. M/s BKS Metalics Private Limited (Neemrana, Rajasthan)
2. M/s ASRI Trade Pte. Ltd. (Singapore)

These Consolidated financial statements were approved and adopted by board of directors of the Company in their meeting held on June 29, 2021.

1.2. Statement of compliance:

The Consolidated financial statements have been prepared in accordance with Indian Accounting Standards (Ind AS) as prescribed under Section 133 of the Companies Act, 2013 read with Companies (Indian Accounting Standards) Rules, 2015 and amended and relevant provisions of the Companies Act, 2013.

1.3. Basis of preparation of Consolidated financial statements:

- a) The consolidated financial statements relate to the Group, and joint ventures. Subsidiary are those entities in which the Parent directly or indirectly, has interest more than 50% of the voting power or otherwise control the composition of the board or governing body so as to obtain economic benefits from activities. The consolidated financial statements have been prepared on the following basis:-
- b) The financial statements of the subsidiaries are combined on a line-by-line basis by adding together the like items of assets, liabilities, income and expenses after fully eliminating intra-group balances and intra-group transactions and unrealized profits or losses in accordance with IND AS 110 –'Consolidated Financial Statements' notified under Section 133 of the Act, read with Companies (Indian Accounting Standards) Rules, 2015 as amended time to time. The deferred tax to be recognised for temporary differences arises from elimination of profits and losses resulting from intra group transactions.

Name of the Company	Nature	Country of Incorporation	% of Shareholding & Voting Power
M/s BKS Metalics Private Limited	Subsidiary	India	51.00%
M/s ASRI Trade Pte. Ltd.	Subsidiary	Singapore	100.00%

- c) The difference between the cost of investment and the share of net assets at the time of acquisition of shares in the subsidiaries is identified in the financial statements as Goodwill or Capital Reserve as the case may be.
- d) In case of foreign subsidiaries, revenue items are consolidated at the average exchange rate during the year. All assets and liabilities are translated at year end exchange rate. The resulting exchange differences are recognised as Other Comprehensive Income / (loss) and disclosed accordingly.



- e) Significant Accounting Policies of the financial statements of the company and its subsidiaries are set out in their respective Financial Statements.

1.4. **Significant accounting policies:** The significant accounting policies to prepare consolidated financial statements are in uniformity with the standalone financial statements of the Company. Following are the additional policies specifically considered for preparation of consolidated financial statements:

(i) **Business Combination:**

Business Combinations are accounted for using the acquisition method. The cost of acquisition is measured at the aggregate of the fair values at the date of exchange of assets given, liabilities incurred or assumed and equity instruments issued by the Company in exchange for control of the acquiree. The acquiree's identifiable assets, liabilities and contingent liabilities that meet the recognition criteria are stated at their fair values at the acquisition date except certain assets and liabilities required to be measured as per the applicable standard.

(ii) **Goodwill**

Goodwill is an asset representing the future economic benefits arising from other assets acquired in a business combination that are not individually identified and separately recognized. Goodwill is initially measured at cost, being the excess of the consideration transferred over the net identifiable assets acquired and liabilities assumed, measured in accordance with Ind AS 103 – Business Combinations. An impairment loss is recognized whenever the carrying amount of an asset or its cash generating unit (CGU) exceeds its recoverable amount.



Notes to Reconciliation

a) Deferred Tax

Under Previous GAAP, deferred tax is calculated using the income statement approach, which focuses on differences between accounting profits and taxable profits for the period. Under Ind AS, deferred tax is accounted using the balance sheet approach, which focuses on temporary differences between the carrying amount of the assets or liabilities in the balance sheet and its tax base. The resulting changes in the amount of deferred tax is recognised in deferred tax liability on the date of transition and subsequently in Statement of Profit and loss for those items relating to Profit & loss and in other comprehensive income for those which are classified through FVTOCI.

b) Employee Benefits

Both under Indian GAAP and IND AS, the company recognized costs related to its post employment defined benefits plan on an actuarial basis. Under Indian GAAP the entire cost including actuarial gain/loss are charged to profit or loss. Under IND AS, Remeasurements are recognized in Other Comprehensive Income.

c) Other Equity

Retained Earnings as at 1 April 2019 has been adjusted to the above IND AS transition adjustments. Refer 'Reconciliation of Total Equity' as at 31 march 2020 and 1 April 2019' as given above .

d) Other Comprehensive Income

Under Indian GAAP the company has not presented Other Comprehensive Income separately. Hence Indian GAAP profit or loss is reconciled to total comprehensive income.

e) Trade discount and Volume rebate

Under Previous GAAP, Trade discounts and volume rebates received are not encompassed within the definition of revenue, since they represent a reduction of cost. Under IND AS, Trade discount and volume rebate cover in definition of Revenue so it is deducted from sales.

As per our report of even date
For Sharma Sharma & Co.

Chartered Accountants
F.R.N.: 009462N


CA Suvir Sharma
Partner
M.No.: 088272
Place : Gurugram
Date: 29-06-2021



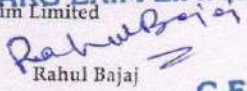
For AKG EXIM LIMITED


Managing Director
Mahima Gera
(Managing Director)
DIN: 02205003

For AKG EXIM LIMITED


Pragati Parnika
Company Secretary
Membership No. A58202

For and on behalf of the Board of Directors
AKG Exim Limited


Rahul Bajaj
(Executive Director & CFO)
DIN: 03408766

C.F.O.



DHARAM TANEJA ASSOCIATES
CHARTERED ACCOUNTANTS

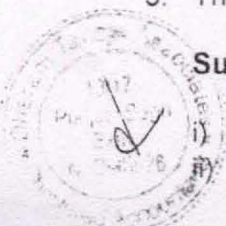
Independent Auditor's Review Report on the Quarterly Unaudited Consolidated Financial Results of the Company Pursuant to the Regulation 33 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended.

TO
THE BOARD OF DIRECTORS OF
AKG EXIM LIMITED

1. We have reviewed the accompanying Statement of unaudited Consolidated Financial Results of **AKG EXIM LIMITED** ("the Holding Company") and its subsidiaries (the Holding and its subsidiaries together referred to as "the Group") for the quarter ended 31st December, 2021 ("the statement") attached herewith being submitted by the Holding pursuant to the requirement of Regulation 33 of the SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 as amended ("the Listing Regulations").
2. This Statement, which is the responsibility of the Holding's management and approved by the Holding's Board of Directors, has been prepared in accordance with the recognition and measurement principles laid down in the Indian Accounting Standard 34 "Interim Financial Reporting" ("Ind AS 34"), prescribed under section 133 of the Companies Act, 2013 as amended, read with relevant rules issued thereunder and other accounting principles generally accepted in India. Our responsibility is to express a conclusion on the Statement based on our review.
3. We conducted our review of the statement in accordance with the Standard on Review Engagements (SRE) 2410, "Review of Interim Financial Information Performed by the Independent Auditor of the Entity", issued by the Institute of Chartered Accountants of India. A review of interim financial information consists of making inquiries, primarily of persons responsible for financial and accounting matters, and applying analytical and other review procedures. A review is substantially less in scope than an audit conducted in accordance with Standards on Auditing and consequently does not enable us to obtain assurance that we would become aware of all significant matters that might be identified in an audit. We have not performed an audit and accordingly, we do not express an audit opinion.
4. We also performed procedures in accordance with the Circular issued by the Securities and Exchange Board of India under Regulation 33(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended, to the extent applicable.
5. The Statement includes the results of the following entities:

Subsidiaries

- i) BKS Metalics Private Limited
- ii) ASRI Trade Pte. Ltd



6. Based on our review conducted and procedures performed as stated in paragraph 3 and 4 above, nothing has come to our attention that causes us to believe that the accompanying statement, prepared in accordance with the recognition and measurement principles laid down in the aforesaid Indian Accounting Standard specified under Section 133 of the Companies Act, 2013, as amended, read with relevant rules issued thereunder and other accounting principles generally accepted in India, has not disclosed the information required to be disclosed in terms of the Listing Regulations, read with the Circular, including the manner in which it is to be disclosed, or that it contains any material misstatement.

FOR DHARAM TANEJA ASSOCIATES
Chartered Accountants
FRN 003563N

Varun Taneja

CA Varun Taneja
Partner

M. No.:095325

UDIN: 22095325AAHGME7292

Place: Delhi

Dated: 03-02-2022





DHARAM TANEJA ASSOCIATES

CHARTERED ACCOUNTANTS

Independent Auditor's Review Report on the Quarterly Unaudited Standalone Financial Results of the Company Pursuant to the Regulation 33 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended

TO
THE BOARD OF DIRECTORS OF
AKG EXIM LIMITED

1. We have reviewed the accompanying Statement of Unaudited Standalone Financial Results of **AKG EXIM LIMITED** ("the Company") for the quarter ended December 31, 2021 ("the Statement") attached herewith, being submitted by the Company pursuant to the requirement of Regulation 33 of the SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015, as amended ("the Listing Regulations").
2. This statement, which is the responsibility of the Company's management and approved by the Company's Board of Directors, has been prepared in accordance with the recognition and measurement principles laid down in Indian Accounting Standard 34 (Ind AS), "Interim Financial Reporting" as prescribed under section 133 of the Companies Act, 2013 as amended, read with relevant rules issued thereunder and other accounting principles generally accepted in India. Our responsibility is to express a conclusion on the Statement based on our review
3. We conducted our review of the statement in accordance with the Standard on Review Engagements (SRE) 2410, "Review of Interim Financial Information Performed by the Independent Auditor of the Entity", issued by the Institute of Chartered Accountants of India. A review of interim financial information consists of making inquiries, primarily of persons responsible for financial and accounting matters, and applying analytical and other review procedures. A review is substantially less in scope than an audit conducted in accordance with Standards on Auditing and consequently does not enable us to obtain assurance that we would become aware of all significant matters that might be identified in an audit. We have not performed an audit and accordingly, we do not express an audit opinion.
4. Based on our review conducted as stated in paragraph 3 above, nothing has come to our attention that causes us to believe that the accompanying statement, prepared in accordance with the recognition and measurement principles laid down in the aforesaid Indian Accounting Standard ('Ind-AS') specified under section 133 of the Companies Act, 2013 as amended, read with relevant rules issued thereunder and other recognized accounting practices and policies generally accepted in India, has not disclosed the information required to be disclosed in terms of the Listing Regulations, read with the Circular, including the manner in which it is to be disclosed, or that it contains any material misstatement.

FOR DHARAM TANEJA ASSOCIATES
Chartered Accountants
FRN 003563N

Varun Taneja
CA Varun Taneja
Partner
M. No. 095325



AKG EXIM LIMITED

Regd. Off.: H.B. Twin Tower, 07th Floor, Max Hospital Building, Netaji Subhash Place, Pitampura, Delhi-110034
Corp. Off.: Unit No. 237, 02nd Floor, Tower-B, Spazedge, Sector-47, Sohna Road, Gurugram-122018, Haryana
CIN: L00063DL2005PLC139045

E-Mail Id: csakg@akg-global.com, Tel. No. +91-124-4267873

Statement of Unaudited Standalone Financial Results for the quarter and nine months ended 31st December, 2021

(Rs in Lakhs except as stated)

S No.	Particulars	STANDALONE					
		Quarter Ended			Nine Months Ended		Year Ended
		December 31, 2021 (Unaudited) 3 Months	September 30, 2021 (Unaudited) 3 Months	December 31, 2020 (Unaudited) 3 Months	December 31, 2021 (Unaudited) 9 Months	December 31, 2020 (Unaudited) 9 Months	March 31, 2021 (Audited) 12 Months
1	Income						
	a) Revenue from operations	3,521.12	2,299.10	2,270.33	7,332.79	5,172.16	7,867.77
	b) Other operating income	-	-	-	-	-	-
	Total revenue from operations	3,521.12	2,299.10	2,270.33	7,332.79	5,172.16	7,867.77
2	Other income	-	0.05	1.13	26.79	19.70	19.72
3	Total income (1+2)	3,521.12	2,299.15	2,271.46	7,359.58	5,191.86	7,887.49
4	Expenses						
	a) Cost of materials consumed	-	-	-	-	-	-
	b) Purchases of stock-in-trade	3,366.58	2,369.71	2,247.96	7,055.45	4,730.79	7,245.26
	c) Change in inventories of finished goods and work-in-progress & Stock In Trade	-157.50	-272.50	-155.24	-383.12	52.65	-9.31
	d) Employee benefits expense	23.03	18.66	19.19	59.62	56.53	56.15
	e) Finance costs	18.44	24.37	21.80	63.62	60.06	89.30
	f) Depreciation and amortisation expense	3.62	3.62	0.59	10.20	16.90	17.46
	g) Other expenses:						
	- Power & Fuel	0.98	1.64	3.50	4.07	8.06	-
	- Other expenses	219.79	110.70	92.29	441.36	193.29	343.54
	Total Expenses	3,474.94	2,256.21	2,230.09	7,251.20	5,118.28	7,742.40
5	Profit/(Loss) before exceptional items and tax (3-4)	46.18	42.94	41.37	108.38	73.58	145.09
6	Exceptional items	-	-	-	-	-	-
7	Profit/(Loss) before tax (5 + 6)	46.18	42.94	41.37	108.38	73.58	145.09
8	Tax expense						
	- Current tax	12.01	11.16	10.76	28.18	19.13	37.72
	- Taxes in respect of earlier years	-	-	-	-	-	-
	- Mat Credit Entitlement	-	-	-	-	-	-
	- Deferred Tax Charge/ (Credit)	-0.03	-0.03	-1.30	-0.25	0.87	0.45
9	Net Profit/(Loss) for the period (7 - 8)	34.20	31.80	31.91	80.45	53.57	106.92
10	Other Comprehensive Income (OCI)						
	i) a) items that will not be reclassified to profit or loss	-	-	-	-	-	-
	b) Income tax relating to items that will not be reclassified to profit or loss	-	-	-	-	-	-
	ii) a) items that will be reclassified to profit or loss	-	-	-	-	-	-
	b) Income tax relating to items that will be reclassified to profit or loss	-	-	-	-	-	-
11	Total Comprehensive Income for the period (9 + 10)	34.20	31.80	31.91	80.45	53.57	106.92
12	Paid-up Equity share capital (Face value per share Rs 10 each)	1,059.22	1,059.22	1,059.22	1,059.22	1,059.22	1,059.22
13	Other Equity						
14	Earnings per share of Rs 10 each						
	(a) Basic (Rs)	0.32	0.30	0.30	0.76	0.51	1.01
	(b) Diluted (Rs)	0.32	0.30	0.30	0.76	0.51	1.01

- The above standalone and consolidated financial results have been prepared in accordance with the Indian Accounting Standards ("Ind AS") as prescribed under Section 133 of the Companies Act, 2013 read with relevant rules issued thereunder.
- The above standalone and consolidated financial results have been reviewed by the Audit Committee and approved by the Board of Directors in their respective meetings held on February 03, 2022 and have been reviewed by the Statutory Auditors of the Company.
- The Company's/ Group's operations and revenue were impacted on account of disruption in economic activity due to COVID 19. The management believes that the overall impact of the pandemic is short term and temporary in nature and is not likely to have any significant impact on the recoverability of the carrying value of its assets and the future operations. The management is closely monitoring the developments and possible effects that may result from the pandemic on its financial condition, liquidity and operations and is actively working to minimize the impact of this unprecedented situation.
- The figures of the previous period/year have been regrouped/reclassified, wherever necessary, to conform to current period's/year's classification.

By the Order of the Board

For AKG EXIM LIMITED

For AKG Exim Limited

Mahima Goel
Managing Director
DIN: 02205003

For AKG EXIM LIMITED

Rahul Baja

Rahul Baja
Executive Director & CFO
DIN: 03408766

C.F.O.

Place : Gurugram
Date : 03-02-2022

AKG EXIM LIMITED

Regd. Off.: H.B. Twin Tower, 07th Floor, Max Hospital Building, Netaji Subhash Place, Pitampura, Delhi-110034
Corp. Off.: Unit No. 237, 02nd Floor, Tower-B, Spazedge, Sector-47, Sohna Road, Gurugram-122018, Haryana

CIN: L00063DL2005PLC139045

E-Mail Id: csagk@akg-global.com, Tel. No. +91-124-4267873

Statement of Unaudited Consolidated Financial Results for the quarter and nine months ended 31st December, 2021

(Rs in Lakhs except as stated)

S. No.	Particulars	CONSOLIDATED					
		Quarter Ended			Nine Months Ended		Year Ended
		December 31, 2021 (Unaudited) 3 Months	September 30, 2021 (Unaudited) 3 Months	December 31, 2020 (Unaudited) 3 Months	December 31, 2021 (Unaudited) 9 Months	December 31, 2020 (Unaudited) 9 Months	March 31, 2021 (Audited) 12 Months
1	Income						
	a) Revenue from operations	5,418.68	3,519.72	3,243.92	11,240.21	7,076.68	10,649.32
	b) Other operating income	-	-	-	-	-	-
	Total revenue from operations	5,418.68	3,519.72	3,243.92	11,240.21	7,076.68	10,649.32
2	Other income (Refer Note No 4)	-	5.73	3.65	47.25	19.70	19.72
3	Total income (1+2)	5,418.68	3,525.45	3,247.57	11,287.46	7,096.39	10,669.04
4	Expenses						
	a) Cost of materials consumed	-	-	-	-	-	-
	b) Purchases of stock-in-trade	5,170.00	3,497.10	3,125.15	10,731.38	6,492.05	9,837.65
	c) Change in inventories of finished goods & work-in-progress	-157.50	-272.50	-155.24	-380.80	52.65	-13.20
	d) Excise duty on sales	-	-	-	-	-	-
	e) Employee benefits expense	26.40	23.27	22.62	72.47	62.75	87.71
	f) Finance costs	18.44	24.37	30.55	63.62	68.81	92.64
	g) Depreciation and amortisation expense	3.62	3.62	0.59	10.20	16.90	17.46
	h) Other expenses:						
	- Power & Fuel	0.98	4.83	3.50	5.81	8.06	10.28
	- Other expenses	293.58	182.03	137.87	629.36	291.72	458.88
	Total Expenses	5,355.52	3,462.73	3,165.05	11,132.04	6,992.93	10,491.42
5	Profit/(Loss) before exceptional items and tax (3-4)	63.16	62.72	82.52	155.42	103.46	177.63
6	Exceptional items	-	-	-	-	-	-
7	Profit/(Loss) before tax (5 + 6)	63.16	62.72	82.52	155.42	103.46	177.63
8	Tax expense:						
	- Current tax	16.42	16.31	21.46	40.41	26.90	46.18
	- Deferred tax charge/(credit)	-0.03	-0.03	-1.30	-0.25	0.87	0.45
9	Net Profit/(Loss) for the period/year (7 - 8)	46.76	46.44	62.36	115.26	75.69	130.99
10	Other Comprehensive Income (OCI)						
	i) a) items that will not be reclassified to profit or loss	-	-	-	-	-	-
	b) Income tax relating to items that will not be reclassified to profit or loss	-	-	-	-	-	-
	ii) a) items that will be reclassified to profit or loss	-	-	-	-	-	-
	b) Income tax relating to items that will be reclassified to profit or loss	-	-	-	-	-	-
11	Total Comprehensive Income for the period/year (9 + 10)	46.76	46.44	62.36	115.26	75.69	130.99
	Profit attributable to:						
	Owners of the Company						
	Non-controlling interests						
	Other Comprehensive income attributable to:						
	Owners of the Company						
	Non-controlling interests						
	Total Comprehensive income attributable to:						
	Owners of the Company						
	Non-controlling interests						
12	Paid-up Equity share capital (Face value of Rs 10 each)	1,059.22	1,059.22	1,059.22	1,059.22	1,059.22	1,059.22
13	Other Equity	-	-	-	-	-	-
14	Earnings per share of Rs 10 each - Not annualised (in Rs.)						
	(a) Basic (Rs)	0.44	0.44	0.59	1.09	0.71	1.24
	(b) Diluted (Rs)	0.44	0.44	0.59	1.09	0.71	1.24

By the Order of the Board
For AKG Exim Limited

For AKG EXIM LIMITED

Mahima Goel
Managing Director

Managing Director

For AKG EXIM LIMITED

Rahul Bajaj
Executive Director & CFO
DIN: 03408766

C.F.O.

Place : Gurugram
Date : 03-02-2022

AKG EXIM LIMITED

Regd. Off.: H.B. Twin Tower, 07th Floor, Max Hospital Building, Netaji Subhash Place, Pitampura, Delhi-110034

Website: www.akg-global.com, E-mail Id: csakg@akg-global.com, Ph: +91-124-4267873

Corp. Off.: Unit No. 237, 02nd Floor, Tower-B, Spazedge, Sector-47, Sohna Road, Gurugram-122018, Haryana

CIN: L00063DL2005PLC139045

CONSOLIDATED SEGMENT WISE REVENUE, RESULTS AND CAPITAL EMPLOYED

(Rs. In Lacs)

Particulars	QUARTER ENDED			NINE MONTHS ENDED		YEAR ENDED
	31.12.2021	30.09.2021	31.12.2020	31.12.2021	31.12.2020	31.03.2021
	Unaudited	Unaudited	Unaudited	Unaudited	Unaudited	Audited
1	2	3	4			5
1 Segment Revenue						
a. Segment A- Manufacturing	-	-	-	-	-	-
b. Segment B- Trading	5,418.68	3,528.60	3,243.92	11,240.21	6,145.75	10,649.32
Total Segment Revenue	5,418.68	3,528.60	3,243.92	11,240.21	6,145.75	10,649.32
Less: Inter Segment Revenue	22.49	22.01	-	59.44	-	66.33
Net Sales/Income from Operations	5,396.19	3,506.59	3,243.92	11,180.77	6,145.75	10,582.99
2 Segment Results						
Profit(+)/Loss(-) before Tax and Interest						
a. Segment A- Manufacturing	-9.07	-1.52	-3.29	-18.01	-3.30	-4.80
b. Segment B- Trading	90.67	88.61	116.35	218.61	145.17	275.07
Total Profit before Tax	81.60	87.09	113.06	200.60	141.87	270.27
Less: i. Finance Cost	18.44	24.37	30.55	45.18	38.41	92.64
ii. Other unallocable expenditure net off unallocable income	-	-	-	-	-	-
Profit Before Tax	63.16	62.72	82.51	155.42	103.46	177.63
3 Segment Assets						
a. Segment A- Manufacturing	190.78	190.86	73.26	190.78	73.26	125.13
b. Segment B- Trading	4,182.24	3,861.86	3,690.05	4,182.24	3,690.05	3,188.29
Total	4,373.01	4,052.72	3,763.32	4,373.01	3,763.31	3,313.42
4 Segment Liabilities						
a. Segment A- Manufacturing	183.58	174.59	43.26	183.58	43.26	99.93
b. Segment B- Trading	1,847.52	1,688.24	2,594.29	1,847.52	2,594.29	1,020.75
Total	2,031.10	1,862.83	2,637.55	2,031.10	2,637.55	1,120.68
5 Capital Employed						
(Segment Assets Less Segment Liabilities)						
a. Segment A- Manufacturing	7.20	16.27	30.00	7.20	30.00	25.20
b. Segment B- Trading	2,334.71	2,173.61	1,095.76	2,334.72	1,095.76	2,167.53
Total	2,341.91	2,189.88	1,125.76	2,341.92	1,125.76	2,192.73

By the Order of the Board

For AKG EXIM LIMITED

Mahima Goel

Mahima Goel
Managing Director
DIN: 02205003

For AKG EXIM LIMITED

Rahul Baja

Rahul Baja
Executive Director & CFO
DIN: 03408766

C.F.O.

Date: 03-02-2022

Place: Gurugram

AKG EXIM LIMITED

Regd. Off.: H.B. Twin Tower, 07th Floor, Max Hospital Building, Netaji Subhash Place, Pitampura, Delhi-110034

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Corp. Off.: Unit No. 237, 02nd Floor, Tower-B, Spazedge, Sector-47, Sohna Road, Gurugram-122018, Haryana

CIN: L00063DL2005PLC139045

PART-I STATEMENT OF STANDALONE UNAUDITED FINANCIAL RESULTS FOR THE QUARTER ENDED 31ST DECEMBER, 2021

(Amount in Lacs)

Standalone Statement of Asset and Liabilities			
Particulars		Quarter Ended (31-12-2021)	Quarter Ended (30-09-2021)
	Date of start of reporting period	01/10/2021	01/07/2021
	Date of end of reporting period	31/12/2021	30/09/2021
	Whether results are audited or unaudited	Unaudited	Unaudited
	Nature of report standalone or consolidated	Standalone	Standalone
Equity and liabilities			
1	Shareholders' funds		
	Share capital	1,059.22	1,059.22
	Reserves and surplus	1,106.17	1,070.29
	Money received against share warrants	-	-
	Total shareholders' funds	2,165.39	2,129.51
2	Share application money pending allotment	-	-
3	Deferred government grants	-	-
4	Minority interest	-	-
5	Non-current liabilities		
	Long-term borrowings	20.18	37.08
	Deferred tax liabilities (net)	29.38	29.41
	Foreign currency monetary item translation difference liability account	-	-
	Other long-term liabilities	-	-
	Long-term provisions	-	-
	Total non-current liabilities	49.56	66.49
6	Current liabilities		
	Short-term borrowings	1,092.14	993.53
	Trade payables		
	a) total outstanding dues of micro enterprises and small enterprises	-	-
	b) total outstanding dues of creditors other than micro enterprises and small enterprises	210.16	381.34
	Other current liabilities	-154.46	-155.54
	Short-term provisions	286.18	139.20
	Total current liabilities	1,434.02	1,358.53
	Total equity and liabilities	3,648.96	3,554.53
Assets			
1	Non-current assets		
(i)	Fixed assets		
	Tangible assets	71.77	75.40
	Producing properties	-	-
	Intangible assets	-	-
	Preproducing properties	-	-
	Tangible assets capital work-in-progress	-	-
	Intangible assets under development or work-in-progress	-	-
	Total fixed assets	71.77	75.40
(ii)	Non-current investments	96.80	70.61
(iii)	Goodwill on consolidation	-	-
(v)	Deferred tax assets (net)	-	-
(vi)	Foreign currency monetary item translation difference asset account	-	-
(vii)	Long-term loans and advances	88.07	88.07
(viii)	Other non-current assets	4.77	4.11
	Total non-current assets	189.64	162.79

2	Current assets		
	Current investments	-	-
	Inventories	697.07	539.57
	Trade receivables	2,558.64	2,649.03
	Cash and bank balances	4.22	4.25
	Short-term loans and advances	109.03	100.76
	Other current assets	18.60	22.74
	Total current assets	3,387.55	3,316.35
	Total assets	3,648.96	3,554.53

By the Order of the Board
For AKG Exim Limited

For AKG EXIM LIMITED For AKG EXIM LIMITED

Mahima Goel
Managing Director
DIN: 02205003

Rahul Bajaj
Executive Director & CFO
DIN: 03408766

C.F.O.

Date: 03-02-2022
Place: Gurugram

AKG EXIM LIMITED

Regd. Off.: H.B. Twin Tower, 07th Floor, Max Hospital Building, Netaji Subhash Place, Pitampura, Delhi-110034

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Corp. Off.: Unit No. 237, 02nd Floor, Tower-B, Spazedge, Sector-47, Sohna Road, Gurugram-122018, Haryana

CIN: L00063DL2005PLC139045

PART-I STATEMENT OF CONSOLIDATED UNAUDITED FINANCIAL RESULTS FOR THE QUARTER ENDED 31ST DECEMBER, 2021

(Amount in Lacs)

Consolidated Statement of Asset and Liabilities			
Particulars		Quarter Ended (31-12-2021)	Quarter Ended (30-09-2021)
	Date of start of reporting period	01/10/2021	01/07/2021
	Date of end of reporting period	31/12/2021	30/09/2021
	Whether results are audited or unaudited	Unaudited	Unaudited
	Nature of report standalone or consolidated	Consolidated	Consolidated
	Equity and liabilities		
1	Shareholders' funds		
	Share capital	1,111.69	1,111.71
	Reserves and surplus	1,187.52	1,134.56
	Money received against share warrants	-	-
	Total shareholders' funds	2,299.21	2,246.27
2	Share application money pending allotment	-	-
3	Deferred government grants	-	-
4	Minority interest	14.70	14.70
5	Non-current liabilities		
	Long-term borrowings	20.18	37.08
	Deferred tax liabilities (net)	29.38	29.41
	Foreign currency monetary item translation difference liability account	-	-
	Other long-term liabilities	-	-
	Long-term provisions	-	-
	Total non-current liabilities	49.56	66.49
6	Current liabilities		
	Short-term borrowings	1,309.26	1,188.56
	Trade payables		
	a) total outstanding dues of micro enterprises and small enterprises	-	-
	b) total outstanding dues of creditors other than micro enterprises and small enterprises	564.64	630.66
	Other current liabilities	-150.54	-164.51
	Short-term provisions	286.18	139.20
	Total current liabilities	2,009.54	1,793.91
	Total equity and liabilities	4,373.01	4,121.37
	Assets		
1	Non-current assets		
(i)	Fixed assets		
	Tangible assets	250.85	254.48
	Producing properties	-	-
	Intangible assets	-	-
	Preproducing properties	-	-
	Tangible assets capital work-in-progress	-	-
	Intangible assets under development or work-in-progress	-	-
	Total fixed assets	250.85	254.48
(ii)	Non-current investments	96.80	70.61
(iii)	Goodwill on consolidation	-	-
(v)	Deferred tax assets (net)	-	-
(vi)	Foreign currency monetary item translation difference asset account	-	-
(vii)	Long-term loans and advances	88.07	88.07
(viii)	Other non-current assets	8.92	8.27
	Total non-current assets	193.79	166.94

2	Current assets		
	Current investments	-	-
	Inventories	698.64	541.14
	Trade receivables	3,045.47	2,975.63
	Cash and bank balances	17.74	20.00
	Short-term loans and advances	109.03	137.95
	Other current assets	57.50	25.22
	Total current assets	3,928.37	3,699.95
	Total assets	4,373.01	4,121.37

By the Order of the Board

For AKG Exim Limited

For AKG EXIM LIMITED For AKG EXIM LIMITED

Mahima Goel
Rahul Bajaj

Mahima Goel Managing Director

Rahul Bajaj Executive Director & CFO

C.F.O.

DIN: 02205003

DIN: 03408766

Date: 03-02-2022

Place: Gurugram

AKG EXIM LIMITED
CIN: L00063DL2005PLC139045
Standalone Statement Of Cashflow for the Quarter ended 31st December, 2021

(Rs. In Lakhs)

Particulars	As at 31st December, 2021	As at 30th September, 2021
A. CASH FLOW FROM OPERATING ACTIVITY		
Net Profit Before Tax as per Statement of Profit and Loss	46.18	42.94
Adjustments to reconcile profit before tax to net cash flows:		
Depreciation and impairment of property, plant and equipment	3.62	3.62
Preliminary Expenses W/o	1.94	1.94
Net Gain/Loss on disposal of property, plant and equipment	-	-
Foreign Exchange Difference - Expenses	-3.21	-0.34
Interest income	-	0.05
Finance costs	-18.44	-24.37
Income from sale of Investments	-	-
PPE written off	-	-
Other Inflow/(Outflow) of cash	-	-
Provision for doubtful debts, advances, deposits and others	2.91	-76.20
Cash generated from operations before working capital changes	32.99	-52.36
Working capital adjustments:		
Increase/decrease in trade receivables	-90.39	-359.11
Increase/decrease in non current financial assets	8.27	-
Increase/decrease in loan	-	68.28
Increase/decrease in non current assets	0.66	-
Increase/decrease in Investment	-	18.05
Increase/decrease in other current financial assets	-	-
Increase/decrease in other current assets	-4.14	1.17
Increase/decrease in inventory	157.50	-272.50
Increase/decrease in other current financial liabilities	-16.90	280.15
Increase/ decrease in other current liabilities	-1.08	14.95
Increase/decrease in trade payables	-171.18	213.43
Increase/ decrease in non current liabilities	-0.18	-
Increase/ decrease in current provisions	-	49.03
Cash generated from operation	-84.45	-38.91
Income tax paid	12.01	11.16
Net cash flows from operating activities (A)	-72.45	-27.75
B. CASH FLOW FROM INVESTING ACTIVITY		
Proceeds from sale of property, plant and equipment	-	-
Purchase of property, plant and equipment	-	2.74
Purchase of non current investment	-	-
Long Term Loans & Advances	-	-
Purchase/Sale of current investment	-26.19	-18.05
Interest received	-	0.05
Net cash flows used in investing activities (B)	-26.19	-15.26
C. CASH FLOW FROM FINANCING ACTIVITY		
Proceeds from Issue of Share Capital	-	-
Share premium	-	-
Proceeds from / (Repayment of) Short Term Borrowings/long term borrowing	98.61	68.28
Interest Paid	-	-24.37
Net cash flows from/(used in) financing activities (C)	98.61	43.91
Net increase in cash and cash equivalents(A+B+C)	-0.03	0.90
Cash and cash equivalents at the beginning of the year	4.25	3.35
Cash and cash equivalents at year end	4.22	4.25

Notes:

(i) The above Statement of Cash Flows has been prepared under the 'Indirect Method' as set out in Ind AS 7, 'Statement of Cash Flows'.

(ii) Previous year figures have been regrouped / rearranged to make them comparable, wherever considered necessary, with those of the current year.

By the Order of the Board

For AKG EXIM LIMITED **For AKG EXIM LIMITED**


Mahima Goyal
Managing Director
DIN: 02205003


Rahul Bajaj
Executive Director & CFO
DIN: 03408766

C.F.O.

Date: 03-02-2022

Place: Gurugram

AKG EXIM LIMITED
CIN: L00063DL2005PLC139045
Consolidated Statement Of Cashflow for the Quarter ended 31st December, 2021

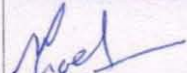
Particulars	(Rs. In Lakhs)	
	As at 31st December, 2021	As at 30th September, 2021
A. CASH FLOW FROM OPERATING ACTIVITY		
Net Profit Before Tax as per Statement of Profit and Loss	63.16	62.72
Adjustments to reconcile profit before tax to net cash flows:		
Depreciation and impairment of property, plant and equipment	3.62	3.62
Preliminary Expenses W/o	1.94	1.94
Net Gain/Loss on disposal of property, plant and equipment	-	-
Foreign Exchange Difference - Expenses	-3.21	-0.34
Interest income	-	0.05
Finance costs	-18.44	-24.37
Income from sale of Investments	-	-
PPE written off	-	-
Other Inflow/(Outflow) of cash	-142.99	15.45
Provision for doubtful debts, advances, deposits and others	-147.13	-76.20
Cash generated from operations before working capital changes	-243.05	-17.13
Working capital adjustments:		
Increase/decrease in trade receivables	69.84	-359.11
Increase/decrease in non current financial assets	-28.92	-
Increase/decrease in loan	-	202.76
Increase/decrease in non current assets	0.65	-
Increase/decrease in Investment	-	18.05
Increase/decrease in other current financial assets	-	-
Increase/decrease in other current assets	32.27	1.17
Increase/decrease in inventory	157.50	-272.50
Increase/decrease in other current financial liabilities	-16.90	261.72
Increase/ decrease in other current liabilities	-13.97	14.95
Increase/decrease in trade payables	-66.02	11.39
Increase/decrease in non current liabilities	-0.18	-
Increase/decrease in current provisions	-	49.03
Cash generated from operation	-108.78	-89.67
Income tax paid	12.01	11.16
Net cash flows from operating activities (A)	-96.78	-78.51
B. CASH FLOW FROM INVESTING ACTIVITY		
Proceeds from sale of property, plant and equipment	-	-
Purchase of property, plant and equipment	-	68.83
Purchase of non current investment	-	-
Long Term Loans & Advances	-	-
Purchase/Sale of current investment	-26.19	-18.05
Interest received	-	0.05
Net cash flows used in investing activities (B)	-26.19	50.83
C. CASH FLOW FROM FINANCING ACTIVITY		
Proceeds from Issue of Share Capital	-	-
Share premium	-	-
Proceeds from / (Repayment of) Short Term Borrowings/long term borrowing	120.70	68.28
Interest Paid	-	-24.37
Net cash flows from/(used in) financing activities (C)	120.70	43.91
Net increase in cash and cash equivalents(A+B+C)	-2.27	16.23
Cash and cash equivalents at the beginning of the year	20.00	3.77
Cash and cash equivalents at year end	17.73	20.00

Notes:

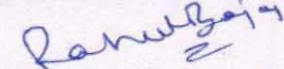
(i) The above Statement of Cash Flows has been prepared under the 'Indirect Method' as set out in Ind AS 7, 'Statement of Cash Flows'.

(ii) Previous year figures have been regrouped / rearranged to make them comparable, wherever considered necessary, with those of the current year.

By the Order of the Board
For AKG EXIM LIMITED For AKG EXIM LIMITED


Mahima Goyal
Managing Director

DIN: 02205003


Rahul Bajaj

Executive Director & CFO
DIN: 03408766

C.F.O.

Date: 03-02-2022
Place: Gurugram



AKG EXIM LIMITED
(CIN- L00063DL2005PLC139045)

STATEMENT OF ACCOUNTING RATIOS

Accounting Ratios

The following table presents certain accounting and other ratios derived from our audited standalone financial statements included in the section titled “*Financial Information*” beginning on page 101 of this Draft Letter of Offer.

Accounting Ratios (Standalone)

Particulars	Period ended December 31, 2021	Year ended March 31, 2021
Earnings Per Share		
(a) Basic Earnings Per Share (after extraordinary items) (in Rs.)	0.76	1.01
(b) Diluted Earnings Per Share (after extraordinary items) (In Rs.)	0.76	1.01
Return on Net Worth (after extraordinary items and excluding Revaluation reserves) (%)	3.72%	5.15%
Net Asset Value / Book Value per Equity Share each	20.44	19.60
EBITDA (Rs. in Lakhs)	182.20	251.85

Accounting Ratios (Consolidated)

Particulars	Period ended December 31, 2021	Year ended March 31, 2021
Earnings Per Share		
(a) Basic Earnings Per Share (after extraordinary items) (in Rs.)	1.09	1.31
(b) Diluted Earnings Per Share (after extraordinary items) (In Rs.)	1.09	1.31
Return on Net Worth (after extraordinary items and excluding Revaluation reserves) (%)	5.05%	6.62%
Net Asset Value / Book Value per Equity Share each	21.57	19.80
EBITDA (Rs. in Lakhs)	229.24	283.72

Capitalization Statement

The statement on our capitalisation is as set out below:

Standalone Capitalization statement

Particulars	(Rs. in Lakhs)	
	As at December 31, 2021 (Pre-Issue)	As adjusted for proposed Issue
Borrowings		



AKG EXIM LIMITED
(CIN- L00063DL2005PLC139045)

Particulars	As at December 31, 2021 (Pre-Issue)	As adjusted for proposed Issue
Current Borrowings	1,092.14	-
Non-Current Borrowings (including current maturity)	20.18	-
Total borrowings (A)	1,112.32	-
Total Equity		
Share capital	1,059.22	-
Reserves and surplus*	1106.17	-
Total Equity (B)	2165.39	-
Non-current Borrowings / Total Equity ratio	0.01	-
Total borrowings / Total Equity ratio (A/B)	0.51	-

*Excluding other Comprehensive Income.

Consolidated Capitalization statement

(Rs. in Lakhs)

Particulars	As at December 31, 2021 (Pre-Issue)	As adjusted for proposed Issue
Borrowings		
Current Borrowings	1309.26	-
Non-Current Borrowings (including current maturity)	20.18	-
Total borrowings (A)	1329.44	-
Total Equity		
Share capital	1111.69	-
Reserves and surplus*	1187.52	-
Total Equity (B)	2299.21	-
Non-current Borrowings / Total Equity ratio	0.01	-
Total borrowings / Total Equity ratio (A/B)	0.58	-

*Excluding other Comprehensive Income.



AKG EXIM LIMITED
(CIN- L00063DL2005PLC139045)

MARKET PRICE INFORMATION

The Equity Shares of our Company are listed on the NSE. As our Equity Shares are listed only on the NSE, stock market data for our Equity Shares has been given for NSE.

For the purpose of this section:

- Year is a Financial Year;
- Average price is the average of the daily closing prices of the Equity Shares, for the year, or the month, or the week, as the case may be;
- High price is the maximum of the daily high prices and Low price is the minimum of the daily low prices of the Equity Shares, for the year, or the month, as the case may be; and
- In case of two days with the same high/low/closing price, the date with higher volume has been considered.

Yearly Stock Market Quotation at NSE

The high, low prices and average of closing prices recorded on the NSE for the preceding three Financial Years and the number of Equity Shares traded on the days the high and low prices were recorded are stated below:

Year ended on March 31	High (in Rs)	Date of High	No. of Shares traded on date of high	Low (in Rs)	Date of Low	No. of Shares traded on date of low	Average price for the year (in Rs.)
2022*	61.30	10 th January, 2022	350960	28.45	16 th May, 2022	240431	41.42
2021	110.80	16 th March, 2021	603544	22.15	24 th August, 2021	2204	40.28
2020	80.00	31 st December, 2020	38400	32.00	24 th February, 2020	4000	47.86
2019	36.85	26 th March, 2019	56000	30.00	24 th December, 2019	4000	33.10

(Source: www.nseindia.com) * Till period ended 24th May, 2022.

Monthly Stock Market Quotation at NSE

The high and low prices and volume of the Equity Shares traded on the respective dates during the last six months is as follows:

Month	High (in Rs.)	Date of High	No. of Shares traded on date of high	Low (in Rs.)	Date of Low	No. of Shares traded on date of low	Average price for the Month (in Rs.)	Total No of Trading Days
April, 2022	43.90	29 th April, 2022	778281	34.80	25 th April, 2022	9750	38.12	19



AKG EXIM LIMITED
(CIN- L00063DL2005PLC139045)

Month	High (in Rs.)	Date of High	No. of Shares traded on date of high	Low (in Rs.)	Date of Low	No. of Shares traded on date of low	Average price for the Month (in Rs.)	Total No of Trading Days
March, 2022	41.80	2 nd March, 2022	2287	36.00	29 th March, 2022	70781	38.83	21
February, 2022	46.00	3 rd February, 2022	11289	38.40	22 nd February, 2022	7033	42.33	20
January, 2022	61.30	10 th January, 2022	350960	43.85	25 th January, 2022	25960	51.55	20
December, 2021	47.30	27 th December, 2021	541041	35.05	1 st December, 2021	20935	39.59	23
November, 2021	41.95	8 th November, 2021	117975	34.95	29 th November, 2021	26659	38.29	20

(Source: www.nseindia.com).

Weekly Stock Market Quotation at NSE

Week end closing prices of the Equity Shares for the last four weeks on the NSE are as below:

Week Ended on	Closing Price (In Rs.)	High (in Rs.)	Date of High	Low (in Rs.)	Date of Low
20 th May, 2022	33.20	33.60	19 th May, 2022	28.45	16 th May, 2022
13 th May, 2022	32.85	40.40	10 th May, 2022	32.10	12 th May, 2022
6 th May, 2022	36.45	43.35	2 nd May, 2022	36.45	6 th May, 2022
29 th April, 2022	43.90	43.90	29 th April, 2022	34.80	25 th April, 2022

(Source: www.nseindia.com).

The closing price of the Equity Shares as on 8th April, 2022 was Rs. 32.25 on the NSE, the trading day immediately preceding the day on which Board of Directors approved the Issue.



AKG EXIM LIMITED
(CIN- L00063DL2005PLC139045)

MANAGEMENT'S DISCUSSION AND ANALYSIS OF FINANCIAL CONDITION AND RESULTS OF OPERATIONS

The following discussion of our financial condition and results of operations should be read in conjunction with the "Financial Statements" beginning on page 101 of this Draft Letter of Offer.

Some of the information contained in the following discussion, including information with respect to our plans and strategies, contain forward-looking statements that involve risks and uncertainties. You should also read "Risk Factors" and "Forward Looking Statements" beginning on page 24 and 18, respectively of this Draft Letter of Offer, which discuss a number of factors and contingencies that could affect our financial condition and results of operations.

Our financial statements included in this Draft Letter of Offer are prepared in accordance with Ind AS, which differs in certain material respects from other accounting standards such as IFRS. Our financial year ends on March 31 of each year. Accordingly, all references to a particular financial year are for the 12 months ended March 31 of that year. Unless otherwise indicated or the context requires, the financial information for Fiscal 2021 included herein is based on the Audited Financial Statements included in this Draft Letter of Offer. For further information, see "Financial Statements" beginning on page 101 of this Draft Letter of Offer.

Neither we, nor any of our affiliates or advisors, nor any other person connected with the Issue has independently verified such information. For further information, see "Presentation of Financial and other Information" beginning on page 16 of this Draft Letter of Offer.

Business overview

Akg Exim Limited is a diversified merchant trading company in vast range of products & commodities with quality management system. Our Company is a merchandiser, distributor of variety of products including Non Basmati Rice, Metal Scrap, Aluminium scrap, Iron Scrap, Spices and Dry Fruits, etc. Our Company connects the seller and the markets, while ensuring lasting prosperity and sustainable supply at both ends. Our Company is catering to a large number of customers with concentration on Indian and overseas subcontinent. With a steady expansion in the market, company is consistently aiming to achieve its mission of providing world class customer services.

Our Company was originally incorporated at New Delhi as "Akg Exim Private Limited" on 26th July, 2005 under the provisions of the Companies Act, 1956 vide Certificate of Incorporation issued by the Asst. Registrar of Companies, NCT of Delhi & Haryana. Consequent upon the conversion of our Company to public limited company, the name of our Company was changed to "Akg Exim Limited" vide fresh certificate of incorporation dated 17th January, 2018 issued by the Registrar of Companies, Delhi.

AKG Exim Ltd is networked across the global continents and countries to span our growth of trading business in diversified product portfolio classified primarily in following categories:

Import / Export of Ferrous and Non-Ferrous Metal Scrap:

- Heavy Melting Steel Scrap As per ISRI, (HMS 1 & 2);
- Light Melting Scrap (Bundles, Lose);
- Cast Iron, Auto Purja;
- Aluminium Scrap; &



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- other type of scrap, etc.

Local Trading of Agro Food commodities:

- Base Oil (for refineries to further fraction in Industrial, Automobiles use);
- Other petroleum-based chemicals
- Rice, spices & Dry Fruits.
- Toluene (Chemical);

Our Company is accredited with Federation of Indian Export Organisations Certificate (FIEO) and has been designated for the Agricultural and Processed Food Products Export Development Authority Certificate (APEDA) and also registered with Food Safety and Standards Authority of India under License under Food Safety and Standards Act, 2006 as an Importer.

We have ventured in health and wellness vertical by endorsing as exclusive channel partner of Immunity bloom which are health and nutritional supplement experts to develop best quality health products based on plant science and pure plant extracts. These products are developed by Saveer Biotech Ltd with their past experience of 10 years involving research & innovation to create high quality nourishing dietary fibre supplements for building healthy and better India. Our company has launched a new E-commerce portal in the name of <https://www.akghealth.com/>. Our Company via this E Commerce platform is reselling the products related to health supplements.

We have two subsidiary Companies, namely.:

- M/s. BKS Metallics Private Limited (BKS) is Subsidiary Company of the M/s AKG Exim Limited and company was incorporated in Delhi, India as on 01st September, 2020. BKS is engaged in diversified Manufacturing / Processing / Wholesaling in Ferrous and Non-Ferrous Metal Scraps. The Manufacturing Plant of the BKS is situated at Plot No. SP2-6(B), RIICO Industrial Area, Phase-I, Neemrana, Alwar 301705, Rajasthan.
- M/s. Asri Trade Pte. Ltd. (ASRI) a wholly owned subsidiary of M/s AKG Exim Limited and incorporated in Singapore as on 19th December, 2017. The registered office of ASRI is situated at 143 CECIL STREET #25-03 GB BUILDING SINGAPORE (069542). ASRI is a diversified trading company in vast range of products & commodities as a wholesaler of Ferrous & nonferrous Metal scrap, Lead Battery Scrap and Commissioning and indenting services in Singapore as well as with the rest of the world.

For further details, refer chapter titled “*Our Business*” on page 85.

SIGNIFICANT DEVELOPMENTS SUBSEQUENT TO THE LAST FINANCIAL YEAR

To the knowledge of our Company and except as disclosed herein, since the date of the last financial statements contained in this Draft Letter of Offer, no other circumstances have arisen which would materially and adversely affect or which would be likely to affect, our operations or profitability, or the value of our assets or our ability to pay our material liabilities within the next 12 (twelve) months.



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FACTORS AFFECTING OUR RESULTS OF OPERATIONS

Our business is subjected to various risks and uncertainties, including those discussed in the section titled "*Risk Factors*" beginning on page 24 of this Draft Letter of offer. Our results of operations and financial conditions are affected by numerous factors including the following:

- Our success depends on the value, perception and quality of our product;
- Branding and marketing;
- General economic and business conditions;
- Company's inability to successfully implement its growth and expansion plans;
- Increasing competition in the Industry;
- Changes in technology;
- Any change in the laws and regulations to Industry in which we operate;
- Operational guidance and support

SIGNIFICANT ACCOUNTING POLICIES

The accounting policies have been applied consistently to the periods presented in the Limited Review Unaudited Standalone and Consolidated Financial Statements and Audited Standalone and Consolidated Financial Statements. For details of our significant accounting policies, please refer chapter titled "Financial Statements" on page 101 of this Draft Letter of Offer.

CHANGE IN ACCOUNTING POLICIES IN PREVIOUS 3 YEARS

Except as mentioned in chapter titled "Financial Statements" on page 101, There has been no change in accounting policies for the period which has been included in this Draft Letter of Offer.

RESERVATIONS, QUALIFICATIONS AND ADVERSE REMARKS

For details, please refer chapter titled "Financial Statements" on page 101 of this Draft Letter of Offer.

SUMMARY OF OPERATIONS

The following discussion on result of operations should be read in conjunction with the Unaudited Standalone and consolidated financial statements of our Company for the nine months period ended on December 31, 2021 and as on March 31, 2021.

The following table sets forth, for the fiscal years indicated, certain items derived from our Company's Audited financial statements, in each case stated in absolute terms and as a percentage of total sales and/or total revenue:



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(Rs. In Lakhs)

Particulars	For the nine months December, 2021		For the nine months December, 2020		For the financial year ended 31 st March, 2021		For the financial year ended 31 st March, 2020	
	Standalone	Consolidated	Standalone	Consolidated	Standalone	Consolidated	Standalone	Consolidated
Income:-								
Revenue from Operations	7332.79	11240.21	5172.16	7076.68	7867.77	10649.32	6647.61	6647.61
<i>As a % of Total Revenue</i>	99.63%	99.58%	99.62%	99.72%	99.75%	99.82%	95.37%	95.37%
Other Income	26.79	47.25	19.7	19.7	19.72	19.72	322.47	322.47
<i>As a % of Total Revenue</i>	0.36%	0.42%	0.38%	0.28%	0.25%	0.18%	4.63%	4.63%
Total Revenue (A)	7359.78	11287.46	5191.86	7096.38	7887.49	10669	6970.08	6970.08
Growth %								
Expenditure:-								
Cost of Material Consumed	7055.45	10731.38	4730.79	6492.05	7245.26	9837.65	5197.61	5197.61
Change in Inventory	-383.12	-380.8	52.65	52.65	-9.31	-13.2	784.86	784.86
Employees Benefit Expenses	59.62	72.47	56.53	62.75	56.15	87.71	130.83	130.83
<i>As a % of Total Revenue</i>	0.81%	0.64%	1.09%	0.88%	0.71%	0.82%	1.88%	1.88%
Depreciation and Amortization Expense	10.2	10.2	16.9	16.9	17.46	17.46	57.6	57.6
<i>As a % of Total Revenue</i>	0.14%	0.09%	0.33%	0.24%	0.22%	0.16%	0.83%	0.83%
Finance Cost	63.62	63.62	60.06	68.81	89.3	92.64	131.38	131.38
<i>As a % of Total Revenue</i>	0.86%	0.56%	1.16%	0.97%	1.13%	0.87%	1.88%	1.88%
Power and Fuel	4.07	5.81	8.06	8.06	0	10.28	8.44	8.44
<i>As a % of Total Revenue</i>	0.06%	0.05%	0.16%	0.11%	0.00%	0.10%	0.12%	0.12%
Other Expenses	441.36	629.36	193.29	291.72	343.54	458.88	507.94	507.94
<i>As a % of Total Revenue</i>	6.00%	5.58%	3.72%	4.11%	4.36%	4.30%	7.29%	7.29%



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Particulars	For the nine months December, 2021		For the nine months December, 2020		For the financial year ended 31 st March, 2021		For the financial year ended 31 st March, 2020	
	Standalone	Consolidated	Standalone	Consolidated	Standalone	Consolidated	Standalone	Consolidated
Total Expenses (B)	7251.2	11132.04	5118.28	6992.94	7742.4	10491.4	6818.66	6818.66
<i>As a % of Total Revenue</i>	98.52%	98.62%	98.58%	98.54%	98.16%	98.34%	97.83%	97.83%
Profit before extraordinary items and tax	108.38	155.42	73.58	103.44	145.09	177.62	151.42	151.42
<i>As a % of Total Revenue</i>	1.47%	1.38%	1.42%	1.46%	1.84%	1.66%	2.17%	2.17%
Extraordinary Items	-	-	0	-	-	-	-	-
Profit before Tax	108.38	155.42	73.58	103.44	145.09	177.62	151.42	151.42
PBT Margin	1.47%	1.38%	1.42%	1.46%	1.84%	1.66%	2.17%	2.17%
Tax Expense:								
i. Current Tax	28.18	40.41	19.13	26.9	37.72	46.18	36.1	36.1
ii. Deferred Tax Expenses/(Credit)	-0.25	-0.25	0.87	0.87	0.45	0.45	6.78	6.78
iii. Income tax for earlier year	-	-	-	-	-	-	-	-
PAT	80.45	115.26	53.58	75.67	106.92	130.99	108.54	108.54
PAT Margin %	1.09%	1.02%	1.03%	1.07%	1.36%	1.23%	1.56%	1.56%

COMPARISON OF PERIOD ENDED DECEMBER 31, 2021 WITH PERIOD ENDED DECEMBER 31, 2020

INCOME

Income from Operations

(Rs. In Lacs)

Particulars	31.12.2021		31.12.2020		Variance In %	
	Standalone	Consolidated	Standalone	Consolidated	Standalone	Consolidated



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Particulars	31.12.2021		31.12.2020		Variance In %	
	Standalone	Consolidated	Standalone	Consolidated	Standalone	Consolidated
Revenue from Operations	7332.79	11240.21	5172.16	7076.68	41.77	58.83

The operating income of the Company for the period ending December 31, 2021 on standalone is Rs. 7332.79 Lakhs as compared to Rs. 5172.16 lakhs for the period ended December 31, 2020 on standalone basis, showing an increase of 41.77%, and such increase is due to increase in volume of operations.

Accordingly, the operating income of the Company for the period ending December 31, 2021 on consolidated is Rs. 11240.21 Lakhs as compared to Rs. 7076.68 lakhs for the period ended December 31, 2020 on consolidated basis, showing an increase of 58.83%, and such increase is due to increase in volume of operations.

Other Income

Our other income increased from Rs. 19.70 Lacs to Rs. 26.79 lacs on standalone and Our Other Income increase from Rs. 19.70 Lakhs to Rs. 47.25 Lakhs on consolidated basis during the period ended 31st December, 2020 to 31st December, 2021. This was primarily due to sale of fixed assets.

Employee Benefit Expenses

Particulars	31.12.2021		31.12.2020		Variance In %	
	Standalone	Consolidated	Standalone	Consolidated	Standalone	Consolidated
Employee Benefit Expenses	59.62	72.47	56.53	62.75	5.47	15.49

There is 5.47% increase in employee benefit expenses from Rs. 56.53 lacs during nine months ended 31st December, 2020 to Rs. 59.62 lacs during nine months December 31, 2021 on standalone basis and there is 15.49% increase in employee benefit expenses from Rs. 62.75 lacs during nine months ended 31st December, 2020 to Rs. 72.47 lacs during nine months December 31, 2021 on consolidated basis which is due to increase in staff and salary & wages.



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Finance Cost

(Rs. In Lacs)

Particulars	31.12.2021		31.12.2020		Variance In %	
	Standalone	Consolidated	Standalone	Consolidated	Standalone	Consolidated
Finance Cost	63.62	63.62	60.06	68.81	5.93	-7.54

Our finance cost which consists of interest, processing fees and charges increased by 5.93% during the nine months ended 31st December, 2021 as compared to finance cost during the nine months ended 31st December, 2020 on standalone basis due to increase in interest expenses and Bank charges.

Also, there is decrease in finance cost by 7.54% during the during the nine months ended 31st December, 2021 as compared to finance cost during the nine months ended 31st December, 2020 on consolidated basis due to decrease in interest expenses and Bank charges of subsidiary Company.

Other Expenses

(Rs. In Lacs)

Particulars	31.12.2021		31.12.2020		Variance In %	
	Standalone	Consolidated	Standalone	Consolidated	Standalone	Consolidated
Other expenses	441.36	629.36	193.29	291.72	128.34	115.74

There is 128.34% increase in other expenses from Rs. 193.29 lacs during the nine months ended 31st December, 2020 to Rs. 441.35 lacs during the nine months ended December 31, 2021 on standalone basis which is due to increase in other expenses and accordingly, there is 115.74% increase in other expenses from Rs. 291.72 lacs during the nine months ended 31st December, 2020 to Rs. 629.36 lacs during the nine months ended December 31, 2021 on consolidated basis which is in line with increase in volume of business operations.

Depreciation

There is 39.64% decrease in Depreciation expenses during the nine months ended December 31, 2021 as compared with depreciation expenses during the nine months ended December 31, 2020 due to decrease in value of Fixed assets on standalone and consolidated basis.



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Profit Before Tax

Particulars	31.12.2021		31.12.2020		Variance In %	
	Standalone	Consolidated	Standalone	Consolidated	Standalone	Consolidated
Profit before Tax	108.38	155.42	73.58	103.44	47.30	50.25

Profit before tax increased from Rs. 73.58 lacs during the nine months ended 31st December, 2020 to Rs. 108.38 lacs during the nine months December 31, 2021 on standalone basis in line with increase in volume of business operations.

Accordingly, Profit before tax increased from Rs. 103.44 lacs during the nine months ended 31st December, 2020 to Rs. 155.42 lacs during the nine months December 31, 2021 on consolidated basis in line with increase in volume of business operations.

Net Profit

Particulars	31.12.2021		31.12.2020		Variance In %	
	Standalone	Consolidated	Standalone	Consolidated	Standalone	Consolidated
Net Profit	80.45	115.26	53.58	75.67	50.15	52.32

Profit after tax increased from Rs. 53.58 lacs during the nine months ended 31st December, 2020 to Rs. 80.45 lacs during the nine months December 31, 2021 on standalone basis in line with increase in volume of business operations.

Accordingly, Profit before tax increased from Rs. 75.67 lacs during the nine months ended 31st December, 2020 to Rs. 115.26 lacs during the nine months December 31, 2021 on consolidated basis in line with increase in volume of business operations.

COMPARISON OF FINANCIAL YEAR ENDED MARCH 31, 2021 WITH FINANCIAL YEAR ENDED MARCH 31, 2020

INCOME

Income from Operations

Particulars	31.03.2021		31.03.2020		Variance In %	
	Standalone	Consolidated	Standalone	Consolidated	Standalone	Consolidated



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	Standalone	Consolidated	Standalone	Consolidated	Standalone	Consolidated
Revenue from Operations	7867.77	10649.32	6647.61	6647.61	18.35	60.20

The operating income of the Company for the year ending March 31, 2021 on standalone is Rs. 7867.77 Lakhs as compared to Rs. 6647.61 lakhs for the year ended March 31, 2020 on standalone basis, showing an increase of 18.35%, and such increase is due to increase in volume of operations.

Accordingly, the operating income of the Company for the year ending March 31, 2021 on consolidated is Rs. 10649.32 Lakhs as compared to Rs. 6647.61 lakhs for the year ended March 31, 2020 on consolidated basis, showing an increase of 60.20%, and such increase is due to increase in volume of operations.

Other Income

Our other income decreased from Rs. 322.47 Lacs to Rs. 19.72 lacs on standalone basis and Our Other Income decreased from Rs. 322.47 Lakhs to Rs. 19.72 Lakhs on consolidated basis during the year ended 31st March, 2020 to 31st March, 2021. This was primarily due to sale of fixed assets.

Employee Benefit Expenses

(Rs. In Lacs)

Particulars	31.03.2021		31.03.2020		Variance In %	
	Standalone	Consolidated	Standalone	Consolidated	Standalone	Consolidated
Employee Benefit Expenses	56.15	87.71	130.83	130.83	-57.08	-32.96

There is 57.08% decrease in employee benefit expenses from Rs. 130.83 lacs during year ended 31st March, 2020 to Rs. 56.15 lacs during year March 31, 2021 on standalone basis and there is 32.96% decrease in employee benefit expenses from Rs. 130.83 lacs during year ended 31st March, 2020 to Rs. 87.71 lacs during year March 31, 2021 on consolidated basis which is due to decrease in staff and salary & wages.

Finance Cost

(Rs. In Lacs)

Particulars	31.03.2021		31.03.2020		Variance In %	
	Standalone	Consolidated	Standalone	Consolidated	Standalone	Consolidated
Finance Cost	89.3	92.64	131.38	131.38	-32.03	-29.49



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Our finance cost which consists of interest, processing fees and charges decreased by 32.03% during the year ended 31st March, 2021 as compared to finance cost during the year ended 31st March, 2020 on standalone basis due to decrease in interest expenses and Bank charges.

Accordingly, Our finance cost which consists of interest, processing fees and charges decreased by 29.49% during the year ended 31st March, 2021 as compared to finance cost during the year ended 31st March, 2020 on standalone basis due to decrease in interest expenses and Bank charges.

Other Expenses

Particulars	31.03.2021		31.03.2020		Variance In %	
	Standalone	Consolidated	Standalone	Consolidated	Standalone	Consolidated
Other expenses	343.54	458.88	507.94	507.94	-32.37	-9.66

There is 32.37% decrease in other expenses from Rs. 507.94 lacs during the year ended 31st March, 2020 to Rs. 343.54 lacs during the year ended March 31, 2021 on standalone basis which is due to decrease in other expenses and accordingly, there is 9.66% decrease in other expenses from Rs. 507.94 lacs during the year ended 31st March, 2020 to Rs. 458.88 lacs during the year ended March 31, 2021 on consolidated basis which is in line with volume of business operations.

Depreciation

There is 69.69% decrease in Depreciation expenses during the year ended March 31, 2021 as compared with depreciation expenses during the year ended March 31, 2020 due to decrease in value of Fixed assets on standalone and consolidated basis.

Profit Before Tax

Particulars	31.03.2021		31.03.2020		Variance In %	
	Standalone	Consolidated	Standalone	Consolidated	Standalone	Consolidated
Profit before Tax	145.09	177.62	151.42	151.42	-4.18	17.30

Profit before tax slightly decreased from Rs. 151.42 lacs during the year ended 31st March, 2020 to Rs. 145.09 lacs during the year March 31, 2021 on standalone basis in line with volume of business operations.



Also, Profit before tax increased from Rs. 151.42 lacs during the year ended 31st March, 2020 to Rs. 177.62 lacs during the year ended March 31, 2021 on consolidated basis due to increase in volume of business operations of subsidiary company.

Net Profit

Particulars	(Rs. In Lacs)					
	31.03.2021		31.03.2020		Variance In %	
	Standalone	Consolidated	Standalone	Consolidated	Standalone	Consolidated
Net Profit	106.92	130.99	108.54	108.54	-1.49	20.68

Profit after tax decreased from Rs. 108.54 lacs during the year ended 31st March, 2020 to Rs. 106.92 lacs during the year March 31, 2021 on standalone basis in line with the volume of business operations.

Also, Profit before tax increased from Rs. 108.54 lacs during the year ended 31st March, 2020 to Rs. 130.99 lacs during the year ended March 31, 2021 on consolidated basis due to increase in volume of business operations by subsidiary Company.

Known trends or uncertainties that have had or are expected to have a material adverse impact on sales, revenue or income from continuing operations

Other than as described in the chapter titled “*Risk Factors*” and chapter titled “*Management’s Discussion and Analysis of Financial Conditions and Results of Operations*” beginning on pages 24 and 106, respectively, of this Draft Letter of Offer, to our knowledge there are no known trends or uncertainties that have or are expected to have a material adverse impact on our income from continuing operations.

Unusual or Infrequent Events or Transactions

Except as described elsewhere in this Draft Letter of Offer, there have been no events or transactions to our knowledge which may be described as “unusual” or “infrequent”.

Significant economic/regulatory changes

Government policies governing the sector in which we operate as well as the overall growth of the Indian economy has a significant bearing on our operations. Major changes in these factors can significantly impact income from continuing operations.



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There are no significant economic changes that materially affected our Company's operations or are likely to affect income except as mentioned in the chapter titled "*Risk Factors*" on page 24 of this Draft Letter of Offer.

Expected future changes in relationship between costs and revenues, in case of events such as future increase in labour or material costs or prices that will cause a material change are known

Other than as described in the chapter titled "*Risk Factors*" and chapter titled "*Management's Discussion and Analysis of Financial Conditions and Results of Operations*" beginning on pages 24 and 106, respectively, and elsewhere in this Draft Letter of Offer, there are no known factors to our knowledge which would have a material adverse impact on the relationship between costs and income of our Company. Our Company's future costs and revenues will be determined by demand/supply situation and government policies.

The extent to which material increases in net sales or revenue are due to increased sales volume or increased sales prices

Increase in revenues is by and large linked to increase in sale of units of our existing products and increasing output volume of our products.

Competitive Conditions

We expect competition in the sector from existing and potential competitors to intensify. However, on account of cost reduction and cost control, consistently delivering quality products, expansion into new markets and backward integration into production of key raw materials, we are able to stay competitive. For further details, kindly refer the chapter titled "*Our Business*" beginning on page 85 of this Draft Letter of Offer.



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SECTION VII - LEGAL AND OTHER INFORMATION

OUTSTANDING LITIGATIONS AND OTHER DEFAULTS

Our Company is subject to various legal proceedings from time to time, primarily arising in the ordinary course of business. There is no outstanding litigation which has been considered material in accordance with our Company's 'Policy for Determination of Materiality', framed in accordance with Regulation 30 of the SEBI Listing Regulations, and accordingly, there is no such outstanding litigation involving our Company that requires disclosure in this Draft Letter of Offer. However, solely for the purpose of the Issue, the following outstanding litigations have been disclosed in this section of this Draft Letter of Offer, to the extent applicable: any outstanding civil litigation, including tax litigation, involving our Company, where the amount involved is where the amount involved is 20% of Turnover or Net Worth of the Company for the immediately preceding financial year ("Materiality Threshold") or above.

Except as disclosed below, there are no outstanding litigation with respect to (i) issues of moral turpitude or criminal liability on the part of our Company; (ii) material violations of statutory regulations by our Company; (iii) economic offences where proceedings have been initiated against our Company; (iv) any pending matters, which if they result in an adverse outcome, would materially and adversely affect our operations or our financial position.

Pre-litigation notices received by our Company from third-parties (excluding notices pertaining to any offence involving issues of moral turpitude, criminal liability, material violations of statutory regulations or proceedings related to economic offences) shall not be evaluated for materiality until such time our Company are impleaded as defendants in litigation proceedings before any judicial forum.

LITIGATIONS INVOLVING OUR COMPANY

LITIGATIONS AGAINST OUR COMPANY

Criminal proceeding against our Company

Nil

Action and Proceeding initiated by Statutory / Regulatory Authority including economic offences against our Company

Nil

Other Proceeding against our Company including matters which are considered material as per Materiality Policy

Nil

LITIGATIONS BY OUR COMPANY

Criminal proceeding by our Company

Nil



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Other Proceeding by our Company including matters which are considered material as per Materiality Policy

S. No.	Defendant Name	Plaintiff Name	Case Number	Address	Amount	Status
1	Kingston Peptech Pvt Ltd.	AKG Exim Limited	9086/2016	Survey o 172, Katwad Sonasan Road, Sonasan, Talprantij District Sabarkantha, Gujrat-383210	35,68,285.00	Pending, Rohini Courts, Delhi
			9088/2016			
			9089/2016			
			9090/2016			
			9091/2016			
2	Sidhant Timbers Pvt Ltd.	AKG Exim Limited	8094/2016	Plot No. 3-4, Pocket-20, Sector-24, Rohini-110085	25,24,776.00	Pending, Rohini Courts, Delhi
			8095/2016			
			8096/2016			
			12534/2016			
			13019/2016			
			10782/2016			
3	Aarush Extrusion Pvt Ltd.	AKG Exim Limited	11126/2016	Plot No- 613, Q-2, Riico Industrial Area Khush Khara, Alwar Rajasthan	74,28,328.00	Pending, Rohini Courts, Delhi
			11533/2016			
4	Om Brothers	AKG Exim Limited	11152/2016	204582, Gali No - 06, Chunamandi, Pahar Ganj, New Delhi-110055	72,78,042.00	Pending, Rohini Courts, Delhi
5	Ashirwad Timbers	AKG Exim Limited	1089/2018	Plot No 13 Surey No. 49, Meghpu, Borichi Gandhidham (Kutuch), 370201	34,39,394.00	Pending, Rohini Courts, Delhi
			1090/2018			
6	Santogen Natural Resources Ltd.	AKG Exim Limited	4765/2018	GALA NO. 155, 1ST FLOOR, BUILDING NO. 5/B, MITTAL INDUSTRIAL ESTATE, ANDHERI KURLA ROAD,	10,94,118.61	Pending, Rohini Courts, Delhi



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S. No.	Defendant Name	Plaintiff Name	Case Number	Address	Amount	Status
				MUMBAI Mumbai City MH 400059		
7	R & N Metal	AKG Exim Limited	3331, 3332/2019	-	37,80,294.00	Pending, Rohini Courts, Delhi
8	Customs GOA	AKG Exim Limited	CUSTOMS/85512/2019	-	-	Customs Goa, Appeal (GLOBAL ISPAAT PVT LTD)
9	Surender Singh	AKG Exim Limited	DLNT020013782021	B-88, Village Bhattikalan, New Delhi - 110074	50,000.00	Pending, Rohini Courts, Delhi

LITIGATIONS INVOLVING SUBSIDIARY COMPANIES

LITIGATIONS AGAINST SUBSIDIARY COMPANIES

Criminal proceeding against our Subsidiary Companies

Nil

Action and Proceeding initiated by Statutory/Regulatory Authority against of our Subsidiary Companies

Nil

Other Proceeding against our Subsidiary Companies

Nil

LITIGATIONS BY SUBSIDIARY COMPANIES

Criminal proceeding by our Subsidiary Companies

Nil

Other Proceeding by our Subsidiary Companies

Nil



• Import • Export

AKG EXIM LIMITED
(CIN- L00063DL2005PLC139045)

REVENUE MATTERS:

Nil

DISCLOSURES PERTAINING TO WILFUL DEFAULTERS OR FRAUDULENT BORROWERS

Neither our Company, our Promoters, our Directors are or have been classified as a willful defaulter or fraudulent borrower by a bank or financial institution or a consortium thereof in accordance with the guidelines on willful defaulters or fraudulent borrower issued by RBI.

AMOUNT DUE TO MSME

There is no pending dues to one MSME supplier for more than 30 (thirty) days.



• Import • Export

AKG EXIM LIMITED
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GOVERNMENT AND OTHER STATUTORY APPROVALS

Our Company requires various consents, licenses, permissions and approvals from various central and state authorities under various rules and regulations for carrying on its present business activities. We have received the necessary consents, licenses, permissions and approvals from the Government of India and various governmental agencies required for our present business and to undertake the Issue. Such consents, licenses, permissions and approvals may be required to be renewed periodically and applications for the same are made at the appropriate stage.

Since, our Company intends to utilize the proceeds of the Issue to meet the incremental working capital requirement, no government and regulatory approval pertaining to the Object of the Issue will be required.



• Import • Export

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MATERIAL DEVELOPMENTS

There have not arisen, since the date of the last financial statements disclosed in this Draft Letter of Offer, any circumstances which materially and adversely affect or are likely to affect our profitability taken as a whole or the value of our consolidated assets or our ability to pay our liabilities within the next 12 months.

For further details, please refer to the chapter titled "Management's Discussion and Analysis of Financial Condition and Results of Operations" beginning on page 106 of this Draft Letter of Offer.

OTHER REGULATORY AND STATUTORY DISCLOSURES

Authority for the Issue

This Issue has been authorized by the resolution passed by our Board at its meeting held on April 09, 2022 pursuant to Section 62 (1) (a) of the Companies Act, 2013 and other applicable provisions. The Rights Issue Committee has approved the Record Date for the Issue at its meeting held on [●] and this Draft Letter of Offer at its meeting held on May 24, 2022.

Our Board, in its meeting held on 9th April, 2022 has resolved to issue the Equity Shares to the Eligible Equity Shareholders, at Rs. [●] per Equity Share aggregating up to Rs. [●] Lakhs. The Issue Price is Rs. [●] per Equity Share has been arrived at by our Company prior to determination of the Record Date.

Our Company has received in-principle approval from NSE in accordance with Regulation 28(1) of the SEBI Listing Regulations for listing of the Equity Shares to be Allotted in this Issue pursuant to their respective letters each dated [●]. Our Company will also make application to NSE to obtain its trading approval for the Rights Entitlements as required under the SEBI Rights Issue Circulars.

Our Company has been allotted the ISIN [●] for the Rights Entitlements to be credited to the respective demat accounts of the Equity Shareholders of our Company. For details, see "*Terms of the Issue*" beginning on page 132 of this Draft Letter of Offer.

Prohibition by SEBI

Our Company, our Promoter, our Directors, the members of our Promoter Group and persons in control of our Company have not been prohibited from accessing the capital market or debarred from buying or selling or dealing in securities under any order or direction passed by SEBI or any securities market regulator in any jurisdiction or any authority/court as on date of this Draft Letter of Offer.

Further, our Promoter and our Directors are not promoter or director of any other company which is debarred from accessing or operating in the capital markets or restrained from buying, selling or dealing in securities under any order or direction passed by SEBI. None our Directors or Promoter is associated with the securities market in any manner. Further, there is no outstanding action initiated against any of our Directors or Promoters by SEBI in the five years preceding the date of filing of this Draft Letter of Offer.

Neither our Promoter nor our Directors have been declared as fugitive economic offender under Section 12 of Fugitive Economic Offenders Act, 2018 (17 of 2018).

Prohibition by RBI

Neither our Company, nor our Promoter, and Directors have been categorized or identified as wilful defaulters or fraudulent borrower by any bank or financial institution or consortium thereof, in accordance with the guidelines on willful defaulters issued by the Reserve Bank of India. There are no violations of securities laws committed by them in the past or are currently pending against any of them.

Eligibility for this Issue

Our Company is a listed company and has been incorporated under the Companies Act, 1956. Our Equity Shares are presently listed on the NSE. Our Company is eligible to offer Equity Shares pursuant to this Issue in terms of Chapter III and other applicable provisions of the SEBI ICDR Regulations. Further, our Company is undertaking this Issue in compliance with Part B of Schedule VI of the SEBI ICDR Regulations.

Compliance with Regulations 61 and 62 of the SEBI ICDR Regulations

Our Company is in compliance with the conditions specified in Regulations 61 and 62 of the SEBI ICDR Regulations, to the extent applicable. Further, in relation to compliance with Regulation 62(1)(a) of the SEBI ICDR Regulations, our Company has made application to the Stock Exchange and has received its in-principle approval for listing of the Equity Shares to be issued pursuant to this Issue. NSE is the Designated Stock Exchange for the Issue.

Compliance with Part B of Schedule VI of the SEBI ICDR Regulations

Our Company is in compliance with the provisions specified in Clause (1) of Part B of Schedule VI of the SEBI ICDR Regulations as explained below:

1. Our Company has been filing periodic reports, statements and information in compliance with the SEBI Listing Regulations, as applicable for the last one year immediately preceding the date of filing of this Draft Letter of Offer with the Designated Stock Exchange;
2. The reports, statements and information referred to above are available on the websites of NSE; and
3. Our Company has an investor grievance-handling mechanism which includes meeting of the Stakeholders' Relationship Committee at frequent intervals, appropriate delegation of power by our Board as regards share transfer and clearly laid down systems and procedures for timely and satisfactory redressal of investor grievances.

As our Company satisfies the conditions specified in Clause (1) of Part B of Schedule VI of SEBI ICDR Regulations, and given that the conditions specified in Clause (3) of Part B of Schedule VI of SEBI ICDR Regulations are not applicable to our Company, the disclosures in this Draft Letter of Offer are in terms of Clause (4) of Part B of Schedule VI of the SEBI ICDR Regulations.

Disclaimer Clause of SEBI

The Draft Letter of Offer has not been filed with SEBI in terms of SEBI ICDR Regulations as the size of issue is up to Rs. 2800.00 lakhs. The present Issue being of less than Rs. 5,000 lakhs, our Company is in compliance with first proviso to Regulation 3 of the SEBI ICDR Regulations and our Company shall file the copy of the Letter of Offer prepared in accordance with the SEBI ICDR Regulations with SEBI for information and dissemination on the website of SEBI i.e. www.sebi.gov.in.

Disclaimer from our Company, our Director(s)

Our Company accept no responsibility for statements made otherwise than in this Draft Letter of Offer or in any advertisement or other material issued by our Company or by any other persons at the instance of our Company and anyone placing reliance on any other source of information would be doing so at their own risk.

Investors who invest in the Issue will be deemed to have represented to our Company and its officers, agents, affiliates and representatives that they are eligible under all applicable laws, rules, regulations, guidelines and approvals to acquire Equity Shares, and are relying on independent advice / evaluation as to their ability and quantum of investment in the Issue.

Caution

Our Company shall make all relevant information available to the Eligible Equity Shareholders in accordance with SEBI ICDR Regulations and no selective or additional information would be available for a section of the Eligible Equity Shareholders in any manner whatsoever including at presentations, in research or sales reports etc. after filing of this Draft Letter of Offer.

No dealer, salesperson or other person is authorized to give any information or to represent anything not contained in this Draft Letter of Offer. You must not rely on any unauthorized information or representations. This Draft Letter of Offer is an offer to sell only the Equity Shares and rights to purchase the Equity Shares offered hereby, but only under circumstances and in jurisdictions where it is lawful to do so. The information contained in this Draft Letter of Offer is current only as of its date.

Disclaimer with respect to jurisdiction

This Draft Letter of Offer has been prepared under the provisions of Indian laws and the applicable rules and regulations thereunder. Any disputes arising out of the Issue will be subject to the jurisdiction of the appropriate court(s) in Delhi, India only.

Designated Stock Exchange

The Designated Stock Exchange for the purpose of the Issue is NSE.

Listing

Our Company will apply to NSE for final approval for the listing and trading of the Rights Equity Shares subsequent to their Allotment. No assurance can be given regarding the active or sustained trading in the Rights Equity Shares or the price at which the Rights Equity Shares offered under the Issue will trade after the listing thereof.

Disclaimer Clause of NSE

As required, a copy of this Draft Letter of Offer has been submitted to the NSE. The Disclaimer Clause as intimated by NSE to us, post scrutiny of this Draft Letter of Offer is set out below:



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"National Stock Exchange of India Limited ("the Exchange") has given, vide its letter dated [●] permission to this Company to use the Exchange's name in this Draft Letter of Offer as one of the stock exchanges on which this Company's securities are proposed to be listed. The Exchange has scrutinized this Draft Letter of Offer for its limited internal purpose of deciding on the matter of granting the aforesaid permission to this Company. The Exchange does not in any manner:

- Warrant, certify or endorse the correctness or completeness of any of the contents of this Draft Letter of Offer; or
- Warrant that this Company's securities will be listed or will continue to be listed on the Exchange; or
- Take any responsibility for the financial or other soundness of this Company, its promoters, its management or any scheme or project of this Company;

and it should not for any reason be deemed or construed that this Draft Letter of Offer has been cleared or approved by the Exchange. Every person who desires to apply for or otherwise acquires any securities of this Company may do so pursuant to independent inquiry, investigation and analysis and shall not have any claim against the Exchange whatsoever by reason of any loss which may be suffered by such person consequent to or in connection with such subscription/acquisition whether by reason of anything stated or omitted to be stated herein or for any other reason whatsoever.

NO OFFER IN THE UNITED STATES

THE RIGHTS ENTITLEMENTS AND THE EQUITY SHARES HAVE NOT BEEN AND WILL NOT BE REGISTERED UNDER THE UNITED STATES SECURITIES ACT OF 1933, AS AMENDED (THE "SECURITIES ACT"), OR ANY U.S. STATE SECURITIES LAWS AND MAY NOT BE OFFERED, SOLD, RESOLD OR OTHERWISE TRANSFERRED WITHIN THE UNITED STATES, EXCEPT IN A TRANSACTION EXEMPT FROM THE REGISTRATION REQUIREMENTS OF THE SECURITIES ACT. THE RIGHTS ENTITLEMENTS AND EQUITY SHARES REFERRED TO IN THE DRAFT LETTER OF OFFER ARE BEING OFFERED IN INDIA, BUT NOT IN THE UNITED STATES. THE OFFERING TO WHICH THE DRAFT LETTER OF OFFER RELATES IS NOT, AND UNDER NO CIRCUMSTANCES IS TO BE CONSTRUED AS, AN OFFERING OF ANY EQUITY SHARES OR RIGHTS ENTITLEMENTS FOR SALE IN THE UNITED STATES OR AS A SOLICITATION THEREIN OF AN OFFER TO BUY ANY OF THE SAID SECURITIES. ACCORDINGLY, DRAFT LETTER OF OFFER SHOULD NOT BE FORWARDED TO OR TRANSMITTED IN OR INTO THE UNITED STATES AT ANY TIME.

Neither our Company, nor any person acting on behalf of our Company, will accept a subscription or renunciation from any person, or the agent of any person, who appears to be, or who our Company, or any person acting on behalf of our Company, has reason to believe is, in the United States when the buy order is made. Envelopes containing an Application Form should not be postmarked in the United States or otherwise dispatched from the United States or any other jurisdiction where it would be illegal to make an offer under this Draft Letter of Offer. Our Company is making this Issue on a rights basis to the Eligible Equity Shareholders and this Draft Letter of Offer, Letter of Offer/ Abridged Letter of Offer, Application Form and the Rights Entitlement Letter will be dispatched to the Eligible Equity Shareholders who have provided an Indian address to our Company. Any person who acquires the Rights Entitlements and the Equity Shares will be deemed to have declared, represented, warranted and agreed, by accepting the delivery of the Draft Letter of Offer, (i) that it is not and that, at the time of subscribing for the Equity Shares or the Rights Entitlements, it will not be, in the United States when the buy order is made; and (ii) is authorised to acquire the Rights Entitlements and the Equity Shares in compliance with all applicable laws, rules and regulations.

Our Company reserves the right to treat as invalid any Application Form which: (i) appears to our Company or its agents to have been executed in or dispatched from the United States of America; (ii) does not include the relevant certification set out in the Application Form headed “Overseas Shareholders” to the effect that the person accepting and/or renouncing the Application Form does not have a registered address (and is not otherwise located) in the United States, and such person is complying with laws of the jurisdictions applicable to such person in connection with the Issue, among others; (iii) where our Company believes acceptance of such Application Form may infringe applicable legal or regulatory requirements; or (iv) where a registered Indian address is not provided, and our Company shall not be bound to allot or issue any Equity Shares or Rights Entitlement in respect of any such Application Form.

None of the Rights Entitlements or the Equity Shares have been, or will be, registered under the United States Securities Act of 1933, as amended (the “**Securities Act**”), or any state securities laws in the United States. Accordingly, the Rights Entitlements and Equity Shares are being offered and sold only outside the United States in compliance with Regulation S under the Securities Act and the applicable laws of the jurisdictions where those offers and sales are made.

NO OFFER IN ANY JURISDICTION OUTSIDE INDIA

NO OFFER OR INVITATION TO PURCHASE RIGHTS ENTITLEMENTS OR RIGHTS EQUITY SHARES IS BEING MADE IN ANY JURISDICTION OUTSIDE OF INDIA, INCLUDING, BUT NOT LIMITED TO AUSTRALIA, BAHRAIN, CANADA, THE EUROPEAN ECONOMIC AREA, GHANA, HONG KONG, INDONESIA, JAPAN, KENYA, KUWAIT, MALAYSIA, NEW ZEALAND, SULTANATE OF OMAN, PEOPLE'S REPUBLIC OF CHINA, QATAR, SINGAPORE, SOUTH AFRICA, SWITZERLAND, THAILAND, THE UNITED ARAB EMIRATES, THE UNITED KINGDOM AND THE UNITED STATES. THE OFFERING TO WHICH THIS DRAFT LETTER OF OFFER RELATES IS NOT, AND UNDER NO CIRCUMSTANCES IS TO BE CONSTRUED AS, AN OFFERING OF ANY RIGHTS EQUITY SHARES OR RIGHTS ENTITLEMENT FOR SALE IN ANY JURISDICTION OUTSIDE INDIA OR AS A SOLICITATION THEREIN OF AN OFFER TO BUY ANY OF THE SAID SECURITIES. ACCORDINGLY, THIS DRAFT LETTER OF OFFER SHOULD NOT BE FORWARDED TO OR TRANSMITTED IN OR INTO ANY OTHER JURISDICTION AT ANY TIME.

Consents

Consents in writing of our Directors, Legal Advisor, the Registrar to the Issue and the Bankers to the Issue/ Refund Bank to act in their respective capacities, have been obtained and such consents have not been withdrawn up to the date of this Draft Letter of Offer.

Our Company has received written consent dated 23rd May, 2022 from our Statutory Auditor, for inclusion of their report on the Financial Information in this Draft Letter of Offer and to include their name in this Draft Letter of Offer and as an ‘expert’ as defined under Section 2(38) of the Companies Act, 2013 in relation to the Statement of Tax Benefits dated 23rd May, 2022 in the form and context in which it appears in this Draft Letter of Offer. Such consent has not been withdrawn up to the date of this Draft Letter of Offer.

Expert Opinion

Our Company has received written consent dated 23rd May, 2022 from our Statutory Auditor to include their name as required in this Draft Letter of Offer and as an ‘expert’ as defined under Section 2(38) of

the Companies Act, 2013 dated 23rd May, 2022 on the Financial Information and the Statement of Tax Benefits dated 23rd May, 2022 and such consent has not been withdrawn as of the date of this Draft Letter of Offer. The term 'expert' and consent thereof, does not represent an expert or consent within the meaning under the U.S. Securities Act.

Except for the abovementioned documents, provided by our Auditors, our Company has not obtained any expert opinions.

Performance vis-à-vis objects - Public/Rights Issue of our Company

Our Company has not made any rights issues, However, Our Company has made a public issues during the five years immediately preceding the date of this Draft Letter of Offer. There have been no instances in the past, wherein our Company has failed to achieve the objects in its previous issues.

Filing

SEBI *vide* the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) (Fourth Amendment) Regulations, 2020 has amended Regulation 3(b) of the SEBI ICDR Regulations as per which the threshold of filing of Draft Letter of Offer with SEBI for rights issues has been increased. The threshold of the rights issue size under Regulation 3 (b) of the SEBI ICDR Regulations has been increased from Rupees ten crores to Rupees fifty crores. Since the size of this Issue falls below this threshold, the Draft Letter of Offer has been filed with the Stock Exchanges and not with SEBI. However, the Draft Letter of Offer will be submitted with SEBI for information and dissemination and will be filed with the Stock Exchanges.

Mechanism for Redressal of Investor Grievances

Our Company has adequate arrangements for redressal of investor grievances in compliance with the SEBI Listing Regulations. We have been registered with the SEBI Complaints Redress System (SCORES) as required by the SEBI Circular no. CIR/ OIAE/ 2/ 2011 dated June 3, 2011. Consequently, investor grievances are tracked online by our Company.

Our Company has a Stakeholders Relationship Committee which meets at least once a year and as and when required. Its terms of reference include considering and resolving grievances of Shareholders in relation to transfer of shares and effective exercise of voting rights Our Registrar and Share Transfer Agent. All investor grievances received by us have been handled by the Registrar and Share Transfer Agent in consultation with the Company Secretary and Compliance Officer.

Investor complaints received by our Company are typically disposed of within 15 days from the receipt of the complaint.

Investors may contact the Registrar or our Company Secretary and Compliance Officer for any pre Issue or post Issue related matter. All grievances relating to the ASBA process may be addressed to the Registrar, with a copy to the SCSBs (in case of ASBA process), giving full details such as name, address of the Applicant, contact number(s), e mail address of the sole/ first holder, folio number or demat account number, number of Equity Shares applied for, amount blocked (in case of ASBA process), ASBA Account number and the Designated Branch of the SCSBs where the Application Form or the plain paper application, as the case may be, was submitted by the Investors along with



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a photocopy of the acknowledgement slip (in case of ASBA process). For details on the ASBA process, see "*Terms of the Issue*" beginning on page 132. The contact details of Registrar to the Issue and our Company Secretary and Compliance Officer are as follows:

Investor Grievances arising out of this Issue

Investors may contact the Registrar to the Issue at:

Registrar to the Issue
MAS SERVICES LIMITED
T-34, 2nd Floor,
Okhla Industrial Area Phase - II,
New Delhi - 110020
Tel No.: +91-11-26387281/82/83
Fax No.: +91-11-26387384
Website: www.masserv.com
E-mail ID: info@masserv.com
Contact Person: Mr. Sharwan Mangla
SEBI Registration No: INR000000049

Investors may contact the Registrar to the Issue or our Company Secretary and Compliance Officer for any pre-Issue/post- Issue related matter such as non-receipt of letter of Allotment, credit of Rights Equity Shares, refund and such other matters. The contact details of the Compliance Officer are as follows:

Company Secretary and Compliance Officer
Ms. Mahak
Unit No. 237, 2nd Floor, Tower-B, Spazedge,
Sector 47, Sohna Road,
Gurugram-122018
Email: info@akg-global.com
Website: www.akg-global.com
Tel: 0124-4267873

Investors may contact the Company Secretary and Compliance Officer at the below mentioned address for any pre-Issue/ post-Issue related matters such as non-receipt of Letters of Allotment / share certificates/ demat credit/ Refund Orders etc.

EXEMPTION FROM COMPLYING WITH ANY PROVISIONS OF SECURITIES LAWS, IF ANY, GRANTED BY SEBI

Our Company has not submitted any application to SEBI for exemption from complying with any provisions of Securities.

Status of Complaints

- i. Total number of complaints received during Fiscal 2020: Nil
- ii. Total number of complaints received during Fiscal 2021: Nil



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- iii. Total number of complaints received during Fiscal 2022: Nil
- iv. Time normally taken for disposal of various types of investor complaints: 15 days
 - (a) Share transfer process: Within 15 days after receiving full set of documents
 - (b) Share transmission process: Within 21 days after receiving full set of documents
 - (c) Other Complaints: Within 15 days from the receipt of the complaint

Status of outstanding investor complaints

As on the date of the DLOF, there were Nil outstanding investor complaints.

Changes in Auditor during the last three years

There has been change in the Auditors of the Company during the last three years as follows:

From	To	Date of change
M/s. Sharma Sharma & Co.	M/s. Dharam Taneja Associates	07.12.2021

Minimum Subscription

The objects of the Issue are meeting the Working Capital Requirements and General Corporate Purpose, and do not involve financing of capital expenditure for a project.

Further, our Promoters and Promoter Group have undertaken that they will subscribe to the full extent of their Rights Entitlements and that they shall not renounce their Rights Entitlements (except to the extent of renunciation by any of them in favour of any other Promoter or member of the Promoter Group) subject to the aggregate shareholding of our Promoters and Promoter Group being compliant with the minimum public shareholding requirements under the SCRR and the SEBI Listing Regulations.

Accordingly, in terms of Regulation 86(1) of the SEBI ICDR Regulations, the requirement of minimum subscription is not applicable to the Issue.



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SECTION VIII - ISSUE INFORMATION

TERMS OF THE ISSUE

This section is for the information of the Investors proposing to apply in this Issue. Investors should carefully read the provisions contained in this Letter of Offer, the Abridged Letter of Offer, the Rights Entitlement Letter and the Application Form, before submitting the Application Form. Our Company and the Lead Manager are not liable for any amendments or modifications or changes in applicable laws or regulations, which may occur after the date of this Letter of Offer. Investors are advised to make their independent investigation and ensure that the Application Form is correctly filled up. Unless otherwise permitted under the SEBI ICDR Regulations read with SEBI Rights Issue Circular, Investors proposing to apply in this Issue can apply only through ASBA.

The Eligible Equity Shareholders are requested to note that application in this issue can only be made through ASBA.

This Issue is proposed to be undertaken on a rights basis and is subject to the terms and conditions contained in this *Draft* Letter of Offer, the Abridged Letter of Offer, the Rights Entitlement Letter, the Application Form, and the Memorandum of Association and the Articles of Association of our Company, the provisions of the Companies Act, 2013, the FEMA, the FEMA Rules, the SEBI ICDR Regulations, the SEBI Listing Regulations and the guidelines, notifications, circulars and regulations issued by SEBI, the Government of India and other statutory and regulatory authorities from time to time, approvals, if any, from RBI or other regulatory authorities, the terms of the Listing Agreements entered into by our Company with Stock Exchanges and the terms and conditions as stipulated in the Allotment Advice.

DISPATCH AND AVAILABILITY OF ISSUE MATERIALS

In accordance with the SEBI ICDR Regulations, the SEBI Right issue Circulars, the Abridged Letter of Offer, the Application Form, the Rights Entitlement Letter and other Issue material will be sent/ dispatched only to the Eligible Equity Shareholders who have provided Indian address. In case such Eligible Equity Shareholders have provided their valid e-mail address, the Abridged Letter of Offer, the Application Form, the Rights Entitlement Letter and other Issue material will be sent only to their valid e-mail address and in case such Eligible Equity Shareholders have not provided their e-mail address, then the Abridged Letter of Offer, the Application Form, the Rights Entitlement Letter and other Issue material will be dispatched, on a reasonable effort basis, to the Indian addresses provided by them.

Further, this Draft Letter of Offer will be sent/ dispatched to the Eligible Equity Shareholders who have provided Indian address and who have made a request in this regard. In case such Eligible Equity Shareholders have provided their valid e-mail address, the Letter of Offer will be sent only to their valid e-mail address and in case such Eligible Equity Shareholders have not provided their e-mail address, then the Draft Letter of Offer will be dispatched, on a reasonable effort basis, to the Indian addresses provided by them.

Shareholders can access this Draft Letter of Offer, the Abridged Letter of Offer and the Application Form (provided that the Eligible Equity Shareholder is eligible to subscribe for the Equity Shares under applicable laws) on the websites of:

- (ii) Our Company at www.akg-global.com;
- (iii) The Registrar at www.masserv.com;

(iv) The Stock Exchanges at www.nseindia.com;

Eligible Equity Shareholders can also obtain the details of their respective Rights Entitlements from the website of the Registrar (*i.e.*, www.masserv.com) by entering their DP ID and Client ID or Folio Number (for Eligible Equity Shareholders who hold Equity Shares in physical form as on Record Date) and PAN. The link for the same shall also be available on the website of our Company (*i.e.*, www.akg-global.com).

Please note that neither our Company nor the Registrar shall be responsible for non-dispatch of physical copies of Issue materials, including this Draft Letter of Offer, the Abridged Letter of Offer, the Rights Entitlement Letter and the Application Form or delay in the receipt of this Letter of Offer, the Abridged Letter of Offer, the Rights Entitlement Letter or the Application Form attributable to non-availability of the e-mail addresses of Eligible Equity Shareholders or electronic transmission delays or failures, or if the Application Forms or the Rights Entitlement Letters are delayed or misplaced in the transit.

The distribution of this Draft Letter of Offer, Abridged Letter of Offer, the Rights Entitlement Letter and the issue of Equity Shares on a rights basis to persons in certain jurisdictions outside India is restricted by legal requirements prevailing in those jurisdictions. No action has been, or will be, taken to permit this Issue in any jurisdiction where action would be required for that purpose, except that this Draft Letter of Offer is being filed with the Stock Exchanges. Accordingly, the Rights Entitlements and Equity Shares may not be offered or sold, directly or indirectly, and this Draft Letter of Offer, the Abridged Letter of Offer, the Rights Entitlement Letter, the Application Form or any Issue related materials or advertisements in connection with this Issue may not be distributed, in any jurisdiction, except in accordance with and as permitted under the legal requirements applicable in such jurisdiction. Receipt of this Letter of Offer, the Abridged Letter of Offer, the Rights Entitlement Letter or the Application Form (including by way of electronic means) will not constitute an offer, invitation to or solicitation by anyone in any jurisdiction or in any circumstances in which such an offer, invitation or solicitation is unlawful or not authorised or to any person to whom it is unlawful to make such an offer, invitation or solicitation. In those circumstances, this Draft Letter of Offer, the Abridged Letter of Offer, the Rights Entitlement Letter or the Application Form must be treated as sent for information only and should not be acted upon for making an Application and should not be copied or re-distributed.

Accordingly, persons receiving a copy of this Draft Letter of Offer, the Abridged Letter of Offer, the Rights Entitlement Letter or the Application Form should not, in connection with the issue of the Equity Shares or the Rights Entitlements, distribute or send this Draft Letter of offer, the Abridged Letter of Offer, the Rights Entitlement Letter or the Application Form in or into any jurisdiction where to do so, would, or might, contravene local securities laws or regulations or would subject our Company or its affiliates to any filing or registration requirement (other than in India). If this Draft Letter of offer, the Abridged Letter of Offer, the Rights Entitlement Letter or the Application Form is received by any person in any such jurisdiction, or by their agent or nominee, they must not seek to make an Application or acquire the Rights Entitlements referred to in this Draft Letter of offer, the Abridged Letter of Offer, the Rights Entitlement Letter or the Application Form. Any person who makes an application to acquire Rights Entitlements and the Equity Shares offered in the Issue will be deemed to have declared, represented and warranted that such person is authorized to acquire the Rights Entitlements and the Equity Shares in compliance with all applicable laws and regulations prevailing in

such person's jurisdiction and India, without requirement for our Company or our affiliates to make any filing or registration (other than in India).

PROCESS OF MAKING AN APPLICATION IN THE ISSUE

In accordance with Regulation 76 of the SEBI ICDR Regulations, the SEBI Rights Issue Circulars and the ASBA Circulars, all Shareholders desiring to make an Application in this Issue are mandatorily required to use the ASBA process. Shareholders should carefully read the provisions applicable to such Applications before making their Application through ASBA.

Investors can submit either the Application Form in physical mode to the Designated Branches of the SCSBs or online/ electronic Application through the website of the SCSBs (if made available by such SCSB) authorizing the SCSB to block the Application Money in an ASBA Account maintained with the SCSB. Application through ASBA facility in electronic mode will only be available with such SCSBs who provide such facility.

Investors applying through the ASBA facility should carefully read the provisions applicable to such Applications before making their Application through the ASBA process. For details, titled "Procedure for Application through the ASBA Process" on page 135.

Please note that subject to SCSBs complying with the requirements of SEBI Circular CIR/CFD/DIL/13/2012 dated September 25, 2012, within the periods stipulated therein, Applications may be submitted at the Designated Branches of the SCSBs.

Further, in terms of the SEBI Circular CIR/CFD/DIL/1/2013 dated January 2, 2013, it is clarified that for making Applications by SCSBs on their own account using ASBA facility, each such SCSB should have a separate account in its own name with any other SEBI registered SCSB(s). Such account shall be used solely for the purpose of making an Application in this Issue and clear demarcated funds should be available in such account for such an Application.

Applicants should note that they should very carefully fill-in their depository account details and PAN in the Application Form or while submitting application through online/electronic Application through the website of the SCSBs (if made available by such SCSB). Please note that incorrect depository account details or PAN or Application Forms without depository account details shall be treated as incomplete and shall be rejected. For details refer "Grounds for Technical Rejection" 131. Our Company, the Lead Manager, the Registrar and the SCSBs shall not be liable for any incomplete or incorrect demat details provided by the Applicants.

Additionally, in terms of Regulation 78 of the SEBI ICDR Regulations, Investors may choose to accept the offer to participate in this Issue by making plain paper Applications. Please note that Eligible Equity Shareholders making an application in this Issue by way of plain paper applications shall not be permitted to renounce any portion of their Rights Entitlements. For details, refer chapter titled "Application on Plain Paper under ASBA process".

Options available to the Eligible Equity Shareholders

The Rights Entitlement Letter will clearly indicate the number of Equity Shares that the Eligible Equity Shareholder is entitled to.

If the Eligible Equity Shareholder applies in this Issue, then such Eligible Equity Shareholder can:

- a) apply for its Equity Shares to the full extent of its Rights Entitlements; or
- b) apply for its Equity Shares to the extent of part of its Rights Entitlements (without renouncing the other part); or
- c) apply for Equity Shares to the extent of part of its Rights Entitlements and renounce the other part of its Rights Entitlements; or
- d) apply for its Equity Shares to the full extent of its Rights Entitlements and apply for additional Equity Shares; or
- e) renounce its Rights Entitlements in full.

Procedure for Application through the ASBA process

A Shareholders, wishing to participate in this Issue through the ASBA facility, is required to have an ASBA enabled bank account with an SCSB, prior to making the Application. Shareholders desiring to make an Application in this Issue through ASBA process, may submit the Application Form in physical mode to the Designated Branches of the SCSB or online/ electronic Application through the website of the SCSBs (if made available by such SCSB) for authorizing such SCSB to block Application Money payable on the Application in their respective ASBA Accounts.

Shareholders should ensure that they have correctly submitted the Application Form and have provided an authorisation to the SCSB, *via* the electronic mode, for blocking funds in the ASBA Account equivalent to the Application Money mentioned in the Application Form, as the case may be, at the time of submission of the Application.

For the list of banks which have been notified by SEBI to act as SCSBs for the ASBA process, please refer to <https://www.sebi.gov.in/sebiweb/other/OtherAction.do?doRecognisedFpi=yes&intmlid=34>.

Please note that subject to SCSBs complying with the requirements of the SEBI circular bearing reference number CIR/CFD/DIL/13/2012 dated September 25, 2012, within the periods stipulated therein, Applications may be submitted at the Designated Branches of the SCSBs. Further, in terms of the SEBI circular bearing reference number CIR/CFD/DIL/1/2013 dated January 2, 2013, it is clarified that for making Applications by SCSBs on their own account using ASBA facility, each such SCSB should have a separate account in its own name with any other SEBI registered SCSB(s). Such account shall be used solely for the purpose of making an Application in this Issue and clear demarcated funds should be available in such account for such an Application.

Our Company, its directors, its employees, affiliates, associates and their respective directors and officers and the Registrar shall not take any responsibility for acts, mistakes, errors, omissions and commissions etc., in relation to Applications accepted by SCSBs, Applications uploaded by SCSBs, Applications accepted but not uploaded by SCSBs or Applications accepted and uploaded without blocking funds in the ASBA Accounts.



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Do's for Shareholders applying through ASBA:

- a) Ensure that the details about your Depository Participant, PAN and beneficiary account are correct and the beneficiary account is activated as the Equity Shares will be allotted in the dematerialized form only.
- b) Ensure that the Applications are submitted with the Designated Branch of the SCSBs and details of the correct bank account have been provided in the Application.
- c) Ensure that there are sufficient funds (equal to {number of Equity Shares (including additional Equity Shares) applied for} X {Application Money of Equity Shares}) available in ASBA Account mentioned in the Application Form before submitting the Application to the respective Designated Branch of the SCSB.
- d) Ensure that you have authorised the SCSB for blocking funds equivalent to the total amount payable on application mentioned in the Application Form, in the ASBA Account, of which details are provided in the Application Form and have signed the same.
- e) Ensure that you have a bank account with an SCSB providing ASBA facility in your location and the Application is made through that SCSB providing ASBA facility in such location.
- f) Ensure that you receive an acknowledgement from the Designated Branch of the SCSB for your submission of the Application Form in physical form or plain paper Application.
- g) Ensure that the name(s) given in the Application Form is exactly the same as the name(s) in which the beneficiary account is held with the Depository Participant. In case the Application Form is submitted in joint names, ensure that the beneficiary account is also held in same joint names and such names are in the same sequence in which they appear in the Application Form and the Rights Entitlement Letter.

Don'ts for Shareholders applying through ASBA:

- a) Do not submit the Application Form after you have submitted a plain paper Application to a Designated Branch of the SCSB or vice versa.
- b) Do not send your physical Application to the Registrar, the Escrow Collection Bank(s) (assuming that such Escrow Collection Bank is not an SCSB), a branch of the SCSB which is not a Designated Branch of the SCSB or our Company; instead submit the same to a Designated Branch of the SCSB only.
- c) Do not instruct the SCSBs to unblock the funds blocked under the ASBA process upon making the Application.
- d) Do not submit Application Form using third party ASBA account.

Making of an Application by Eligible Equity Shareholders on Plain Paper under ASBA process

An Eligible Equity Shareholder in India who is eligible to apply under the ASBA process may make an Application to subscribe to this Issue on plain paper in case of non-receipt of Application Form as detailed above. In such cases of non-receipt of the Application Form through e-mail or physical delivery (where applicable) and the Eligible Equity Shareholder not being in a position to obtain it from any other source may make an Application to subscribe to this Issue on plain paper with the same details as per the Application Form that is available on the website of the Registrar, Stock Exchanges. An Eligible Equity Shareholder shall submit the plain paper Application to the Designated Branch of the SCSB for authorising such SCSB to block Application Money in the said bank account maintained with the same



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SCSB. Applications on plain paper will not be accepted from any Eligible Equity Shareholder who has not provided an Indian address or is a U.S. Person or in the United States.

Please note that the Eligible Equity Shareholders who are making the Application on plain paper shall not be entitled to renounce their Rights Entitlements and should not utilize the Application Form for any purpose including renunciation even if it is received subsequently.

The Application on plain paper, duly signed by the Eligible Equity Shareholder including joint holders, in the same order and as per specimen recorded with his/her bank, must reach the office of the Designated Branch of the SCSB before the Issue Closing Date and should contain the following particulars:

- (a) Name of our Company, being Akg Exim Limited;
- (b) Name and address of the Eligible Equity Shareholder including joint holders (in the same order and as per specimen recorded with our Company or the Depository);
- (c) Folio Number (in case of Eligible Equity Shareholders who hold Equity Shares in physical form as on Record Date)/DP and Client ID;
- (d) Except for Applications on behalf of the Central or State Government, the residents of Sikkim and the officials appointed by the courts, PAN of the Eligible Equity Shareholder and for each Eligible Equity Shareholder in case of joint names, irrespective of the total value of the Equity Shares applied for pursuant to this Issue
- (e) Number of Equity Shares held as on Record Date;
- (f) Allotment option - only dematerialised form;
- (g) Number of Equity Shares entitled to;
- (h) Number of Equity Shares applied for within the Rights Entitlements;
- (i) Number of additional Equity Shares applied for, if any (applicable only if entire Rights Entitlements have been applied for);
- (j) Total number of Equity Shares applied for;
- (k) Total amount paid at the rate of Rs. [●] per Equity Share;
- (l) Details of the ASBA Account such as the SCSB account number, name, address and branch of the relevant SCSB;
- (m) In case of non-resident Eligible Equity Shareholders making an application with an Indian address, details of the NRE/FCNR/NRO account such as the account number, name, address and branch of the SCSB with which the account is maintained;
- (n) Authorisation to the Designated Branch of the SCSB to block an amount equivalent to the Application Money in the ASBA Account;
- (o) Signature of the Eligible Equity Shareholder (in case of joint holders, to appear in the same sequence and order as they appear in the records of the SCSB); and
- (p) All such Eligible Equity Shareholders are deemed to have accepted the following:

"// We will not offer, sell or otherwise transfer any of the Rights Equity Shares which may be acquired by us in any jurisdiction or under any circumstances in which such offer or sale is not authorized or to any person to whom it is unlawful to make such offer, sale or invitation except under circumstances that will result in compliance with any applicable laws or regulations. We satisfy, and each account for which we are acting satisfies, all suitability standards for Shareholders in investments of the type subscribed for herein imposed by the jurisdiction of our residence.



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I/ We understand and agree that the Rights Entitlement and Rights Equity Shares may not be reoffered, resold, pledged or otherwise transferred except in an offshore transaction in compliance with Regulation S, or otherwise pursuant to an exemption from, or in a transaction not subject to, the registration requirements of the US Securities Act.

I/ We (i) am/ are, and the person, if any, for whose account I/ we am/ are acquiring such Rights Entitlement and/ or the Rights Equity Shares is/ are, outside the U.S., (ii) am/ are not a "U.S. Person" as defined in ("Regulations"), and (iii) is/ are acquiring the Rights Entitlement and/ or the Rights Equity Shares in an offshore transaction meeting the requirements of Regulations.

I/ We acknowledge that the Company, our affiliates and others will rely upon the truth and accuracy of the foregoing representations and agreements. "

In cases where Multiple Application Forms are submitted for Applications pertaining to Rights Entitlements credited to the same demat account or in demat suspense escrow account, as applicable, including cases where a Shareholders submits Application Forms along with a plain paper Application, such Applications shall be liable to be rejected.

Shareholders are requested to strictly adhere to these instructions. Failure to do so could result in an Application being rejected, with our Company and the Registrar not having any liability to the Shareholders. The plain paper Application format will be available on the website of the Registrar at www.masserv.com.

Our Company and the Registrar shall not be responsible if the Applications are not uploaded by the SCSB or funds are not blocked in the Shareholders' ASBA Accounts on or before the Issue Closing Date.

Making of an Application by Eligible Equity Shareholders holding Equity Shares in physical form

Please note that in accordance with Regulation 77A of the SEBI ICDR Regulations read with the SEBI Rights Issue Circulars, the credit of Rights Entitlements and Allotment of Equity Shares shall be made in dematerialised form only. Accordingly, Eligible Equity Shareholders holding Equity Shares in physical form as on Record Date and desirous of subscribing to Equity Shares in this Issue are advised to furnish the details of their demat account to the Registrar or our Company at least two Working Days prior to the Issue Closing Date, to enable the credit of their Rights Entitlements in their respective demat accounts at least one day before the Issue Closing Date.

Prior to the Issue Opening Date, the Rights Entitlements of those Eligible Equity Shareholders, among others, who hold Equity Shares in physical form, and whose demat account details are not available with our Company or the Registrar, shall be credited in a demat suspense escrow account opened by our Company.

Eligible Equity Shareholders, who hold Equity Shares in physical form as on Record Date and who have opened their demat accounts after the Record Date, shall adhere to following procedure for participating in this Issue:

- a) The Eligible Equity Shareholders shall send a letter to the Registrar containing the name(s), address, e-mail address, contact details and the details of their demat account along with copy of self-attested PAN and self-attested client master sheet of their demat account either by e-



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- mail, post, speed post, courier, or hand delivery so as to reach to the Registrar no later than two Working Days prior to the Issue Closing Date;
- b) The Registrar shall, after verifying the details of such demat account, transfer the Rights Entitlements of such Eligible Equity Shareholders to their demat accounts at least one day before the Issue Closing Date;
 - c) The remaining procedure for Application shall be same as set out in "- *Making of an Application by Eligible Equity Shareholders on Plain Paper under ASBA process*" mentioned above.

Resident Eligible Equity Shareholders who hold Equity Shares in physical form as on the Record Date will not be allowed renounce their Rights Entitlements in the Issue. However, such Eligible Equity Shareholders, where the dematerialized Rights Entitlements are transferred from the suspense escrow demat account to the respective demat accounts within prescribed timelines, can apply for additional Equity Shares while submitting the Application through ASBA process.

Application for Additional Equity Shares

Shareholders are eligible to apply for additional Equity Shares over and above their Rights Entitlements, provided that they are eligible to apply for Equity Shares under applicable law and they have applied for all the Equity Shares forming part of their Rights Entitlements without renouncing them in whole or in part. Where the number of additional Equity Shares applied for exceeds the number available for Allotment, the Allotment would be made as per the Basis of Allotment finalised in consultation with the Designated Stock Exchange. Applications for additional Equity Shares shall be considered and Allotment shall be made in accordance with the SEBI ICDR Regulations and in the manner as set out in "- *Basis of Allotment*" mentioned below.

Eligible Equity Shareholders who renounce their Rights Entitlements cannot apply for additional Equity Shares. Non-resident Renounees who are not Eligible Equity Shareholders cannot apply for additional Equity Shares.

Additional general instructions for Shareholders in relation to making of an application

- i) Please read this Draft Letter of offer carefully to understand the Application process and applicable settlement process.
- ii) Please read the instructions on the Application Form sent to you. Application should be complete in all respects. The Application Form found incomplete with regard to any of the particulars required to be given therein, and/or which are not completed in conformity with the terms of this Draft Letter of offer, the Abridged Letter of Offer, the Rights Entitlement Letter and the Application Form are liable to be rejected. The Application Form must be filled in English.
- iii) In case of non-receipt of Application Form, Application can be made on plain paper mentioning all necessary details as mentioned under the section "*Making of an Application by Eligible Equity Shareholders on Plain Paper under ASBA process*" mentioned above.
- iv) Applications should be (i) submitted to the Designated Branch of the SCSB or made online/electronic through the website of the SCSBs (if made available by such SCSB) for authorising such SCSB to block Application Money payable on the Application in their respective ASBA Accounts. Please note that on the Issue Closing Date, (i) Applications through ASBA process will be uploaded until 5.00 p.m. (Indian Standard Time) or such extended time as permitted by the Stock Exchanges.



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- v) Applications should not be submitted to the Banker(s) to the Issue or Escrow Collection Bank(s) (assuming that such Escrow Collection Bank is not an SCSB), our Company or the Registrar.
- vi) All Applicants, and in the case of Application in joint names, each of the joint Applicants, should mention their PAN allotted under the Income-tax Act, irrespective of the amount of the Application. Except for Applications on behalf of the Central or the State Government, the residents of Sikkim and the officials appointed by the courts, Applications without PAN will be considered incomplete and are liable to be rejected. With effect from August 16, 2010, the demat accounts for Shareholders for which PAN details have not been verified shall be "suspended for credit" and no Allotment and credit of Equity Shares pursuant to this Issue shall be made into the accounts of such Shareholders.
- vii) Ensure that the demographic details such as address, PAN, DP ID, Client ID, bank account details and occupation ("**Demographic Details**") are updated, true and correct, in all respects. Shareholders applying under this Issue should note that on the basis of name of the Shareholders, DP ID and Client ID provided by them in the Application Form or the plain paper Applications, as the case may be, the Registrar will obtain Demographic Details from the Depository. Therefore, Shareholders applying under this Issue should carefully fill in their Depository Account details in the Application. These Demographic Details would be used for all correspondence with such Shareholders including mailing of the letters intimating unblocking of bank account of the respective Shareholders and/or refund. The Demographic Details given by the Shareholders in the Application Form would not be used for any other purposes by the Registrar. Hence, Shareholders are advised to update their Demographic Details as provided to their Depository Participants. **The Allotment Advice and the e-mail intimating unblocking of ASBA Account or refund (if any) would be e-mailed to the address of the Shareholders as per the e-mail address provided to our Company or the Registrar or Demographic Details received from the Depositories. The Registrar will give instructions to the SCSBs for unblocking funds in the ASBA Account to the extent Equity Shares are not allotted to such Shareholders. Please note that any such delay shall be at the sole risk of the Shareholders and none of our Company, the SCSBs, Registrar shall be liable to compensate the Shareholders for any losses caused due to any such delay or be liable to pay any interest for such delay. In case no corresponding record is available with the Depositories that match three parameters, (a) names of the Shareholders (including the order of names of joint holders), (b) DP ID, and (c) Client ID, then such Application Forms are liable to be rejected.**
- viii) By signing the Application Forms, Shareholders would be deemed to have authorised the Depositories to provide, upon request, to the Registrar, the required Demographic Details as available on its records.
- ix) For physical Applications through ASBA at Designated Branches of SCSB, signatures should be either in English or Hindi or in any other language specified in the Eighth Schedule to the Constitution of India. Signatures other than in any such language or thumb impression must be attested by a Notary Public or a Special Executive Magistrate under his/her official seal. The Shareholders must sign the Application as per the specimen signature recorded with the SCSB.
- x) Shareholders should provide correct DP ID and Client ID/ Folio number (for Eligible Equity Shareholders who hold Equity Shares in physical form as on Record Date) while submitting the Application. Such DP ID and Client ID/ Folio number should match the demat account details in the records available with Company and/or Registrar, failing which such Application is liable to be rejected. Shareholders will be solely responsible for any error or inaccurate detail provided in the Application. Our Company, SCSBs or the Registrar will not be liable for any such rejections.



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- xi) In case of joint holders and physical Applications through ASBA process, all joint holders must sign the relevant part of the Application Form in the same order and as per the specimen signature(s) recorded with the SCSB. In case of joint Applicants, reference, if any, will be made in the first Applicant's name and all communication will be addressed to the first Applicant.
- xii) All communication in connection with Application for the Equity Shares, including any change in contact details of the Eligible Equity Shareholders should be addressed to the Registrar prior to the date of Allotment in this Issue quoting the name of the first/sole Applicant, Folio number (for Eligible Equity Shareholders who hold Equity Shares in physical form as on Record Date)/DP ID and Client ID and Application Form number, as applicable. In case of any change in contact details of the Eligible Equity Shareholders, the Eligible Equity Shareholders should also send the intimation for such change to the respective depository participant, or to our Company or the Registrar in case of Eligible Equity Shareholders holding Equity Shares in physical form.
- xiii) Shareholders are required to ensure that the number of Equity Shares applied for by them do not exceed the prescribed limits under the applicable law.
- xiv) Do not apply if you are ineligible to participate in this Issue under the securities laws applicable to your jurisdiction.
- xv) Do not submit the GIR number instead of the PAN as the application is liable to be rejected on this ground.
- xvi) Avoid applying on the Issue Closing Date due to risk of delay/ restrictions in making any physical Application.
- xvii) Do not pay the Application Money in cash, by money order, pay order or postal order.
- xviii) Do not submit multiple Applications.
- xix) No investment under the FDI route (i.e any investment which would result in the Shareholders holding 10% or more of the fully diluted paid-up equity share capital of the Company or any FDI investment for which an approval from the government was taken in the past) will be allowed in the Issue unless such application is accompanied with necessary approval or covered under a pre-existing approval from the government. It will be the sole responsibility of the Shareholders to ensure that the necessary approval or the pre-existing approval from the government is valid in order to make any investment in the Issue. Our Company will not be responsible for any allotments made by relying on such approvals.
- xx) An Applicant being an OCB is required not to be under the adverse notice of RBI and in order to apply for this issue as a incorporated non-resident must do so in accordance with the FDI Circular 2020 and Foreign Exchange Management (Non-Debt Instrument) Rules, 2019.

Grounds for Technical Rejection

Applications made in this Issue are liable to be rejected on the following grounds:

- i) DP ID and Client ID mentioned in Application does not match with the DP ID and Client ID records available with the Registrar.
- ii) Details of PAN mentioned in the Application does not match with the PAN records available with the Registrar.
- iii) Sending an Application to our Company, Registrar, Escrow Collection Bank(s) (assuming that such Escrow Collection Bank is not a SCSB), to a branch of a SCSB which is not a Designated Branch of the SCSB.



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- iv) Insufficient funds are available in the ASBA Account with the SCSB for blocking the Application Money.
- v) Funds in the ASBA Account whose details are mentioned in the Application Form having been frozen pursuant to regulatory orders.
- vi) Account holder not signing the Application or declaration mentioned therein.
- vii) Submission of more than one Application Form for Rights Entitlements available in a particular demat account.
- viii) Multiple Application Forms, including cases where an Shareholders submits Application Forms along with a plain paper Application.
- ix) Submitting the GIR number instead of the PAN (except for Applications on behalf of the Central or State Government, the residents of Sikkim and the officials appointed by the courts).
- x) Applications by persons not competent to contract under the Indian Contract Act, 1872, except Applications by minors having valid demat accounts as per the Demographic Details provided by the Depositories.
- xi) Applications by SCSB on own account, other than through an ASBA Account in its own name with any other SCSB.
- xii) Application Forms which are not submitted by the Shareholders within the time periods prescribed in the Application Form and this Draft Letter of offer.
- xiii) Physical Application Forms not duly signed by the sole or joint Shareholders, as applicable.
- xiv) Application Forms accompanied by stock invest, outstation cheques, post-dated cheques, money order, postal order or outstation demand s.
- xv) If an Shareholders is (a) debarred by SEBI; or (b) if SEBI has revoked the order or has provided any interim relief then failure to attach a copy of such SEBI order allowing the Shareholders to subscribe to their Rights Entitlements.
- xvi) Applications which: (i) appears to our Company or its agents to have been executed in, electronically transmitted from or dispatched from the United States (other than from persons in the United States who are U.S. QIBs and QPs) or other jurisdictions where the offer and sale of the Equity Shares is not permitted under laws of such jurisdictions; (ii) does not include the relevant certifications set out in the Application Form, including to the effect that the person submitting and/or renouncing the Application Form is (a) both a U.S. QIB and a QP, if in the United States or a U.S. Person or (b) outside the United States and is a non-U.S. Person, and in each case such person is eligible to subscribe for the Equity Shares under applicable securities laws and is complying with laws of jurisdictions applicable to such person in connection with this Issue; and our Company shall not be bound to issue or allot any Equity Shares in respect of any such Application Form.
- xvii) Applications which have evidence of being executed or made in contravention of applicable securities laws.
- xviii) Application from Shareholders that are residing in U.S. address as per the depository records (other than from persons in the United States who are U.S. QIBs and QPs).

Applications by non-resident Shareholders.

- a. Payment from third party bank accounts.



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Multiple Applications

In case where multiple Applications are made using same demat account, such Applications shall be liable to be rejected. A separate Application can be made in respect of Rights Entitlements in each demat account of the Shareholders and such Applications shall not be treated as multiple applications. Similarly, a separate Application can be made against Equity Shares held in dematerialized form and Equity Shares held in physical form, and such Applications shall not be treated as multiple applications. Further supplementary Applications in relation to further Equity Shares with/without using additional Rights Entitlement will not be treated as multiple application. A separate Application can be made in respect of each scheme of a mutual fund registered with SEBI and such Applications shall not be treated as multiple applications. For details, see "- *Procedure for Applications by Mutual Funds*" mentioned below.

In cases where Multiple Application Forms are submitted, including cases where (a) a Shareholders submits Application Forms along with a plain paper Application or (b) multiple plain paper Applications (c) or multiple applications through ASBA, such Applications shall be treated as multiple applications and are liable to be rejected.

Procedure for Applications by certain categories of Shareholders

Procedure for Applications by FPIs

In terms of applicable FEMA Rules and the SEBI FPI Regulations, investments by FPIs in the Equity Shares is subject to certain limits, *i.e.*, the individual holding of an FPI (including its Shareholders group (which means multiple entities registered as foreign portfolio Shareholders and directly and indirectly having common ownership of more than 50% of common control)) shall be below 10% of our post-Issue Equity Share capital. In case the total holding of an FPI or Shareholders group increases beyond 10% of the total paid-up Equity Share capital of our Company, on a fully diluted basis or 10% or more of the paid-up value of any series of debentures or preference shares or share warrants that may be issued by our Company, the total investment made by the FPI or Shareholders group will be re-classified as FDI subject to the conditions as specified by SEBI and RBI in this regard and our Company and the Shareholders will also be required to comply with applicable reporting requirements.

FPIs are permitted to participate in this Issue subject to compliance with conditions and restrictions which may be specified by the Government from time to time. FPIs who wish to participate in the Issue are advised to use the Application Form for non-residents. Subject to compliance with all applicable Indian laws, rules, regulations, guidelines and approvals in terms of Regulation 21 of the SEBI FPI Regulations, an FPI may issue, subscribe to or otherwise deal in offshore derivative instruments (as defined under the SEBI FPI Regulations as any instrument, by whatever name called, which is issued overseas by an FPI against securities held by it that are listed or proposed to be listed on any recognised stock exchange in India, as its underlying) directly or indirectly, only in the event (i) such offshore derivative instruments are issued only to persons registered as Category I FPI under the SEBI FPI Regulations; (ii) such offshore derivative instruments are issued only to persons who are eligible for registration as Category I FPIs (where an entity has an investment manager who is from the Financial Action Task Force member country, the investment manager shall not be required to be registered as a Category I FPI); (iii) such offshore derivative instruments are issued after compliance with 'know your client' norms; and (iii) compliance with other conditions as may be prescribed by SEBI.



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An FPI issuing offshore derivative instruments is also required to ensure that any transfer of offshore derivative instruments issued by or on its behalf, is carried out subject to *inter alia* the following conditions:

1. Such offshore derivative instruments are transferred only to persons in accordance with the SEBI FPI Regulations; and
2. prior consent of the FPI is obtained for such transfer, except when the persons to whom the offshore derivative instruments are to be transferred to are pre - approved by the FPI.

No investment under the FDI route will be allowed in the Issue unless such application is accompanied with necessary approval or covered under a pre-existing approval.

Procedure for Applications by AIFs, FVCIs, VCFs and FDI route

The SEBI VCF Regulations and the SEBI FVCI Regulations prescribe, among other things, the investment restrictions on VCFs and FVCIs registered with SEBI. Further, the SEBI AIF Regulations prescribe, among other things, the investment restrictions on AIFs.

As per the SEBI VCF Regulations and SEBI FVCI Regulations, VCFs and FVCIs are not permitted to invest in listed companies pursuant to rights issues. Accordingly, applications by VCFs or FVCIs will not be accepted in this Issue. Further, venture capital funds registered as Category I AIFs, as defined in the SEBI AIF Regulations, are not permitted to invest in listed companies pursuant to rights issues. Accordingly, applications by venture capital funds registered as category I AIFs, as defined in the SEBI AIF Regulations, will not be accepted in this Issue. Other categories of AIFs are permitted to apply in this Issue subject to compliance with the SEBI AIF Regulations. Such AIFs having bank accounts with SCSBs that are providing ASBA in cities / centres where such AIFs are located are mandatorily required to make use of the ASBA facility. Otherwise, applications of such AIFs are liable for rejection.

No investment under the FDI route (i.e any investment which would result in the Shareholders holding 10% or more of the fully diluted paid-up equity share capital of the Company or any FDI investment for which an approval from the government was taken in the past) will be allowed in the Issue unless such application is accompanied with necessary approval or covered under a pre-existing approval from the government. It will be the sole responsibility of the Shareholders to ensure that the necessary approval or the pre-existing approval from the government is valid in order to make any investment in the Issue. Our Company will not be responsible for any allotments made by relying on such approvals.

Procedure for Applications by NRIs

Investments by NRIs are governed by the FEMA Rules. Applications will not be accepted from NRIs that are ineligible to participate in this Issue under applicable securities laws.

As per the FEMA Rules, an NRI or Overseas Citizen of India ("OCI") may purchase or sell capital instruments of a listed Indian company on repatriation basis, on a recognised stock exchange in India, subject to the conditions, *inter alia*, that the total holding by any individual NRI or OCI will not exceed 5% of the total paid-up equity capital on a fully diluted basis or should not exceed 5% of the paid-up value of each series of debentures or preference shares or share warrants issued by an Indian company and the total holdings of all NRIs and OCIs put together will not exceed 10% of the total paid-up equity capital on a fully diluted basis or shall not exceed 10% of the paid-up value of each series of



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debentures or preference shares or share warrants. The aggregate ceiling of 10% may be raised to 24%, if a special resolution to that effect is passed by the general body of the Indian company.

Further, in accordance with press note 3 of 2020, the FDI Policy has been recently amended to state that all investments by entities incorporate in a country which shares land border with India or where beneficial owner of an investment into India is situated in or is a citizen of any such country ("**Restricted Shareholders**"), will require prior approval of the Government of India. It is not clear from the press note whether or not an issue of the Rights Equity Shares to Restricted Shareholders will also require prior approval of the Government of India and each Shareholders should seek independent legal advice about its ability to participate in the Issue. In the event such prior approval has been obtained, the Shareholders shall intimate our Company and the Registrar about such approval within the Issue Period.

Procedure for Applications by Mutual Funds

A separate application can be made in respect of each scheme of an Indian mutual fund registered with SEBI and such applications shall not be treated as multiple applications. The applications made by asset management companies or custodians of a mutual fund should clearly indicate the name of the concerned scheme for which the application is being made.

Procedure for Applications by Systemically Important Non-Banking Financial Companies ("NBFC-SI")

In case of an application made by NBFC-SI registered with RBI, (a) the certificate of registration issued by RBI under Section 45IA of RBI Act, 1934 and (b) net worth certificate from its statutory auditors or any independent chartered accountant based on the last audited financial statements is required to be attached to the application.

Last date for Application

The last date for submission of the duly filled in the Application Form or a plain paper Application is [●], 2022, *i.e.*, Issue Closing Date. Our Board or any committee thereof may extend the said date for such period as it may determine from time to time, subject to the Issue Period not exceeding 30 days from the Issue Opening Date (inclusive of the Issue Opening Date).

If the Application Form is not submitted with an SCSB, uploaded with the Stock Exchanges and the Application Money is not blocked with the SCSB on or before the Issue Closing Date or such date as may be extended by our Board or any committee thereof, the invitation to offer contained in this Draft Letter of offer shall be deemed to have been declined and our Board or any committee thereof shall be at liberty to dispose of the Equity Shares hereby offered, as set out in "*Basis of Allotment*" mentioned below.

Please note that on the Issue Closing Date, (Applications through ASBA process will be uploaded until 5.00 p.m. (Indian Standard Time) or such extended time as permitted by the Stock Exchanges.

Please ensure that the Application Form and necessary details are filled in. In place of Application number, Shareholders can mention the reference number of the e-mail received from Registrar

informing about their Rights Entitlement or last eight digits of the demat account. Alternatively, SCSBs may mention their internal reference number in place of application number.

Withdrawal of Application

An Investor who has applied in this Issue may withdraw their Application at any time during Issue Period by approaching the SCSB where application is submitted. However, no Investor, may withdraw their Application post the Issue Closing Date.

Disposal of Application and Application Money

No acknowledgment will be issued for the Application Money received by our Company. However, the Designated Branches of the SCSBs receiving the Application Form will acknowledge its receipt by stamping and returning the acknowledgment slip at the bottom of each Application Form to the Eligible Equity Shareholders upon submission of the Application.

Our Board reserves its full, unqualified and absolute right to accept or reject any Application, in whole or in part, and in either case without assigning any reason thereto.

In case an Application is rejected in full, the whole of the Application Money will be unblocked in the respective ASBA Accounts, in case of Applications through ASBA. Wherever an Application is rejected in part, the balance of Application Money, if any, after adjusting any money due on Equity Shares Allotted, will be refunded / unblocked in the respective bank accounts from which Application Money was received / ASBA Accounts of the Shareholders within a period of 4 days from the Issue Closing Date. In case of failure to do so, our Company shall pay interest at such rate and within such time as specified under applicable law.

For further instructions, please read the Application Form carefully.

CREDIT OF RIGHTS ENTITLEMENTS IN DEMAT ACCOUNTS OF ELIGIBLE EQUITY SHAREHOLDERS

Rights Entitlements

As your name appears as a beneficial owner in respect of the issued and paid-up Equity Shares held in dematerialised form or appears in the register of members of our Company as an Eligible Equity Shareholder in respect of our Equity Shares held in physical form, as on the Record Date, you may be entitled to subscribe to the number of Equity Shares as set out in the Rights Entitlement Letter.

Eligible Equity Shareholders can also obtain the details of their respective Rights Entitlements from the website of the Registrar (*i.e.*, www.masserv.com) by entering their DP ID and Client ID or Folio Number (for Eligible Equity Shareholders who hold Equity Shares in physical form as on Record Date) and PAN. The link for the same shall also be available on the website of our Company (*i.e.*, www.akg-global.com).

In this regard, our Company has made necessary arrangements with NSDL and CDSL for crediting of the Rights Entitlements to the demat accounts of the Eligible Equity Shareholders in a dematerialized form. A separate ISIN for the Rights Entitlements has also been generated which is [●]. The said ISIN shall



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remain frozen (for debit) until the Issue Opening Date. The said ISIN shall be suspended for transfer by the Depositories post the Issue Closing Date.

Additionally, our Company will submit the details of the total Rights Entitlements credited to the demat accounts of the Eligible Equity Shareholders and the demat suspense escrow account to the Stock Exchanges after completing the corporate action. The details of the Rights Entitlements with respect to each Eligible Equity Shareholders can be accessed by such respective Eligible Equity Shareholders on the website of the Registrar after keying in their respective details along with other security control measures implemented thereat.

Rights Entitlements shall be credited to the respective demat accounts of Eligible Equity Shareholders before the Issue Opening Date only in dematerialised form. Further, if no Application is made by the Eligible Equity Shareholders of Rights Entitlements on or before Issue Closing Date, such Rights Entitlements shall get lapsed and shall be extinguished after the Issue Closing Date. No Equity Shares for such lapsed Rights Entitlements will be credited, even if such Rights Entitlements were purchased from market and purchaser will lose the premium paid to acquire the Rights Entitlements. Persons who are credited the Rights Entitlements are required to make an Application to apply for Equity Shares offered under Rights Issue for subscribing to the Equity Shares offered under Issue.

If Eligible Equity Shareholders holding Equity Shares in physical form as on Record Date, have not provided the details of their demat accounts to our Company or to the Registrar, they are required to provide their demat account details to our Company or the Registrar not later than two Working Days prior to the Issue Closing Date, to enable the credit of the Rights Entitlements by way of transfer from the demat suspense escrow account to their respective demat accounts, at least one day before the Issue Closing Date. Such Eligible Equity Shareholders holding shares in physical form can update the details of their respective demat accounts on the website of the Registrar (*i.e* www.masserv.com). Such Eligible Equity Shareholders can make an Application only after the Rights Entitlements is credited to their respective demat accounts.

In accordance with Regulation 77A of the SEBI ICDR Regulations read with the SEBI Rights Issue Circulars, the credit of Rights Entitlements and Allotment of Equity Shares shall be made in dematerialized form only. Prior to the Issue Opening Date, our Company shall credit the Rights Entitlements to (i) the demat accounts of the Eligible Equity Shareholders holding the Equity Shares in dematerialised form; and (ii) a demat suspense escrow account (namely, [●]) opened by our Company, for the Eligible Equity Shareholders which would comprise Rights Entitlements relating to (a) Equity Shares held in the account of the IEPF authority; or (b) the demat accounts of the Eligible Equity Shareholder which are frozen or the Equity Shares which are lying in the unclaimed suspense account (including those pursuant to Regulation 39 of the SEBI Listing Regulations) or details of which are unavailable with our Company or with the Registrar on the Record Date; or (c) Equity Shares held by Eligible Equity Shareholders holding Equity Shares in physical form as on Record Date where details of demat accounts are not provided by Eligible Equity Shareholders to our Company or Registrar; or (d) credit of the Rights Entitlements returned/reversed/failed; or (e) the ownership of the Equity Shares currently under dispute, including any court proceedings, if any; or (f) non-institutional equity shareholders in the United States.

Eligible Equity Shareholders are requested to provide relevant details (such as copies of self-attested PAN and client master sheet of demat account etc., details/ records confirming the legal and beneficial ownership of their respective Equity Shares) to our Company or the Registrar not later than



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two Working Days prior to the Issue Closing Date, i.e., by [●], 2022 to enable the credit of their Rights Entitlements by way of transfer from the demat suspense escrow account to their demat account at least one day before the Issue Closing Date, to enable such Eligible Equity Shareholders to make an application in this Issue, and this communication shall serve as an intimation to such Eligible Equity Shareholders in this regard. Such Eligible Equity Shareholders are also requested to ensure that their demat account, details of which have been provided to our Company or the Registrar account is active to facilitate the aforementioned transfer.

RENUNCIATION AND TRADING OF RIGHTS ENTITLEMENT

Renounees

All rights and obligations of the Eligible Equity Shareholders in relation to Applications and refunds pertaining to this Issue shall apply to the Renounee(s) as well.

Renunciation of Rights Entitlements

This Issue includes a right exercisable by Eligible Equity Shareholders to renounce the Rights Entitlements credited to their respective demat account either in full or in part.

The renunciation from non-resident Eligible Equity Shareholder(s) to resident Indian(s) and *vice versa* shall be subject to provisions of FEMA Rules and other circular, directions, or guidelines issued by RBI or the Ministry of Finance from time to time. However, the facility of renunciation shall not be available to or operate in favor of an Eligible Equity Shareholders being an erstwhile OCB unless the same is in compliance with the FEMA Rules and other circular, directions, or guidelines issued by RBI or the Ministry of Finance from time to time.

The renunciation of Rights Entitlements credited in your demat account can be made either by sale of such Rights Entitlements, using the secondary market platform of the Stock Exchanges or through an off-market transfer.

Procedure for Renunciation of Rights Entitlements

The Eligible Equity Shareholders may renounce the Rights Entitlements, credited to their respective demat accounts, either in full or in part (a) by using the secondary market platform of the Stock Exchanges (the "**On Market Renunciation**"); or (b) through an off-market transfer (the "**Off Market Renunciation**"), during the Renunciation Period. The Shareholders should have the demat Rights Entitlements credited/lying in his/her own demat account prior to the renunciation. The trades through On Market Renunciation and Off Market Renunciation will be settled by transferring the Rights Entitlements through the depository mechanism.

Shareholders may be subject to adverse foreign, state or local tax or legal consequences as a result of trading in the Rights Entitlements. Shareholders who intend to trade in the Rights Entitlements should consult their tax advisor or stock-broker regarding any cost, applicable taxes, charges and expenses (including brokerage) that may be levied for trading in Rights Entitlements.

Please note that the Rights Entitlements which are neither renounced nor subscribed by the Shareholders on or before the Issue Closing Date shall lapse and shall be extinguished after the Issue Closing Date.

Our Company accept no responsibility to bear or pay any cost, applicable taxes, charges and expenses (including brokerage), and such costs will be incurred solely by the Shareholders.

On Market Renunciation

The Eligible Equity Shareholders may renounce the Rights Entitlements, credited to their respective demat accounts by trading/selling them on the secondary market platform of the Stock Exchanges through a registered stock-broker in the same manner as the existing Equity Shares of our Company.

In this regard, in terms of provisions of the SEBI ICDR Regulations and the SEBI Rights Issue Circulars, the Rights Entitlements credited to the respective demat accounts of the Eligible Equity Shareholders shall be admitted for trading on the Stock Exchanges under ISIN [●] subject to requisite approvals. Prior to the Issue Opening Date, our Company will obtain the approval from the Stock Exchanges for trading of Rights Entitlements. No assurance can be given regarding the active or sustained On Market Renunciation or the price at which the Rights Entitlements will trade. The details for trading in Rights Entitlements will be as specified by the Stock Exchanges from time to time.

The Rights Entitlements are tradable in dematerialized form only. The market lot for trading of Rights Entitlements is one Rights Entitlements.

The On Market Renunciation shall take place only during the Renunciation Period for On Market Renunciation, *i.e.*, from [●] to [●], 2022 (both days inclusive).

The Shareholders holding the Rights Entitlements who desire to sell their Rights Entitlements will have to do so through their registered stock-brokers by quoting the ISIN [●] and indicating the details of the Rights Entitlements they intend to trade.

The Shareholders can place order for sale of Rights Entitlements only to the extent of Rights Entitlements available in their demat account.

The On Market Renunciation shall take place electronically on secondary market platform of NSE under automatic order matching mechanism and on 'T+2 rolling settlement basis', where 'T' refers to the date of trading. The transactions will be settled on trade-for-trade basis. Upon execution of the order, the stock-broker will issue a contract note in accordance with the requirements of the Stock Exchange and the SEBI.

Off Market Renunciation

The Eligible Equity Shareholders may renounce the Rights Entitlements, credited to their respective demat accounts by way of an off-market transfer through a depository participant. The Rights Entitlements can be transferred in dematerialised form only.

Eligible Equity Shareholders are requested to ensure that renunciation through off-market transfer is completed in such a manner that the Rights Entitlements are credited to the demat accounts of the Renounees on or prior to the Issue Closing Date to enable Renounees to subscribe to the Equity Shares in the Issue.



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The Shareholders holding the Rights Entitlements who desire to transfer their Rights Entitlements will have to do so through their depository participant by issuing a delivery instruction slip quoting the ISIN [●], the details of the buyer and the details of the Rights Entitlements they intend to transfer. The buyer of the Rights Entitlements (unless already having given a standing receipt instruction) has to issue a receipt instruction slip to their depository participant. The Shareholders can transfer Rights Entitlements only to the extent of Rights Entitlements available in their demat account.

The instructions for transfer of Rights Entitlements can be issued during the working hours of the depository participants.

The detailed rules for transfer of Rights Entitlements through off-market transfer shall be as specified by the NSDL and CDSL from time to time.

MODE OF PAYMENT

All payments against the Application Forms shall be made only through ASBA facility. The Registrar will not accept any payments against the Application Forms, if such payments are not made through ASBA facility.

In case of Application through the ASBA facility, the Shareholders agrees to block the entire amount payable on Application with the submission of the Application Form, by authorizing the SCSB to block an amount, equivalent to the amount payable on Application, in the Shareholder's ASBA Account. The SCSB may reject the application at the time of acceptance of Application Form if the ASBA Account, details of which have been provided by the Shareholders in the Application Form does not have sufficient funds equivalent to the amount payable on Application mentioned in the Application Form. Subsequent to the acceptance of the Application by the SCSB, our Company would have a right to reject the Application on technical grounds as set forth in this Draft Letter of offer.

After verifying that sufficient funds are available in the ASBA Account details of which are provided in the Application Form, the SCSB shall block an amount equivalent to the Application Money mentioned in the Application Form until the Transfer Date. On the Transfer Date, upon receipt of intimation from the Registrar, and pursuant to the finalization of the Basis of Allotment as approved by the Designated Stock Exchange, the SCSBs shall transfer such amount as per the Registrar's instruction from the ASBA Account into the Allotment Account(s) which shall be a separate bank account maintained by our Company, other than the bank account referred to in sub-section (3) of Section 40 of the Companies Act, 2013. The balance amount remaining after the finalisation of the Basis of Allotment on the Transfer Date shall be unblocked by the SCSBs on the basis of the instructions issued in this regard by the Registrar to the respective SCSB.

In terms of RBI Circular DBOD No. FSC BC 42/24.47.00/2003- 04 dated November 5, 2003, the stock invest scheme has been withdrawn. Hence, payment through stock invest would not be accepted in this Issue.

Mode of payment for Resident Shareholders

All payments on the Application Forms shall be made only through ASBA facility. Applicants are requested to strictly adhere to these instructions.



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Mode of payment for Non-Resident Shareholders

As regards the Application by non-resident Shareholders, payment must be made only through ASBA facility and using permissible accounts in accordance with FEMA, FEMA Rules and requirements prescribed by RBI and subject to the following:

1. In case where repatriation benefit is available, interest, dividend, sales proceeds derived from the investment in Equity Shares can be remitted outside India, subject to tax, as applicable according to the Income-tax Act. However, please note that conditions applicable at the time of original investment in our Company by the Eligible Equity Shareholder including repatriation shall not change and remain the same for subscription in the Issue or subscription pursuant to renunciation in the Issue.
2. Subject to the above, in case Equity Shares are Allotted on a non-repatriation basis, the dividend and sale proceeds of the Equity Shares cannot be remitted outside India.
3. In case of an Application Form received from non-residents, Allotment, refunds and other distribution, if any, will be made in accordance with the guidelines and rules prescribed by RBI as applicable at the time of making such Allotment, remittance and subject to necessary approvals.
4. Application Forms received from non-residents/ NRIs, or persons of Indian origin residing abroad for Allotment of Equity Shares shall, amongst other things, be subject to conditions, as may be imposed from time to time by RBI under FEMA, in respect of matters including Refund of Application Money and Allotment.
5. In the case of NRIs who remit their Application Money from funds held in FCNR/NRE Accounts, refunds and other disbursements, if any shall be credited to such account.
6. Non-resident Renouncees who are not Eligible Equity Shareholders must submit regulatory approval for applying for additional Equity Shares.

BASIS FOR THIS ISSUE AND TERMS OF THIS ISSUE

The Equity Shares are being offered for subscription to the Eligible Equity Shareholders whose names appear as beneficial owners as per the list to be furnished by the Depositories in respect of our Equity Shares held in dematerialised form and on the register of members of our Company in respect of our Equity Shares held in physical form at the close of business hours on the Record Date.

For principal terms of Issue such as face value, Issue Price, Rights Entitlement ratio, see "*The Issue*" beginning on mentioned above.

Fractional Entitlements

The Equity Shares are being offered on a rights basis to existing Eligible Equity Shareholders in the ratio of [●]:[●] ([●] ([●]) fully paid up Equity Shares for every [●] ([●]) fully paid up Equity Shares held as on the Record Date). As per SEBI Rights Issue Circulars, the fractional entitlements are to be ignored. In terms of present ratio, there will no fractional shares.

Ranking

The Equity Shares to be issued and Allotted pursuant to this Issue shall be subject to the provisions of this Draft Letter of offer, the Abridged Letter of Offer, the Rights Entitlement Letter, the Application Form, and the Memorandum of Association and the Articles of Association, the provisions of the Companies Act, 2013, FEMA, the SEBI ICDR Regulations, the SEBI Listing Regulations, and the guidelines, notifications and regulations issued by SEBI, the Government of India and other statutory and regulatory authorities from time to time, the terms of the Listing Agreements entered into by our Company with the Stock Exchanges and the terms and conditions as stipulated in the Allotment advice. The Equity Shares to be issued and Allotted under this Issue shall rank *pari passu* with the existing Equity Shares, in all respects including dividends.

Listing and trading of the Equity Shares to be issued pursuant to this Issue

Subject to receipt of the listing and trading approvals, the Equity Shares proposed to be issued on a rights basis shall be listed and admitted for trading on the Stock Exchange. Unless otherwise permitted by the SEBI ICDR Regulations, the Equity Shares Allotted pursuant to this Issue will be listed as soon as practicable and all steps for completion of necessary formalities for listing and commencement of trading in the Equity Shares will be taken within such period prescribed under the SEBI ICDR Regulations. Our Company has received in-principle approval from the NSE through letter bearing reference number [●] dated [●]. Our Company will apply to the Stock Exchange for final approvals for the listing and trading of the Equity Shares subsequent to their Allotment. No assurance can be given regarding the active or sustained trading in the Equity Shares or the price at which the Equity Shares offered under this Issue will trade after the listing thereof.

The existing Equity Shares are listed and traded on NSE (Scrip Symbol: AKG) under the ISIN: INE00Y801016. The Equity Shares shall be credited to a temporary ISIN which will be frozen until the receipt of the final listing/ trading approvals from the Stock Exchange. Upon receipt of such listing and trading approvals, the Equity Shares shall be debited from such temporary ISIN and credited to the new ISIN for the Equity Shares and thereafter be available for trading and the temporary ISIN shall be permanently deactivated in the depository system of CDSL and NSDL.

The listing and trading of the Equity Shares issued pursuant to this Issue shall be based on the current regulatory framework then applicable. Accordingly, any change in the regulatory regime would affect the listing and trading schedule.

In case our Company fails to obtain listing or trading permission from the Stock Exchange, our Company shall refund through verifiable means/unblock the respective ASBA Accounts, the entire monies received/locked within four days of receipt of intimation from the Stock Exchanges, rejecting the application for listing of the Equity Shares, and if any such money is not refunded/ unblocked within four days after our Company becomes liable to repay it, our Company and every director of our Company who is an officer-in-default shall, on and from the expiry of the fourth day, be jointly and severally liable to repay that money with interest at rates prescribed under applicable law.

Subscription to this Issue by our Promoter and members of the Promoter Group

For details of the intent and extent of subscription by our Promoter and members of the Promoter Group, see "*Capital Structure - Intention and extent of participation by our Promoter*" mentioned above.

Rights of the Rights Equity Shareholder

Subject to applicable laws, the Rights Equity Shareholders shall have the following rights:

- The right to receive dividend, if declared;
- The right to attend general meetings and exercise voting powers, unless prohibited by law;
- The right to vote in person or by proxy;
- The right to receive offers for rights shares and be allotted bonus shares, if announced;
- The right to receive surplus on liquidation;
- The right to free transferability of Rights Equity Shares; and
- Such other rights as may be available to a shareholder of a listed public company under the Companies Act and Memorandum of Association and Articles of Association.

General Terms of the Issue

Market Lot

The Equity Shares of our Company are tradable only in dematerialised form. The market lot for Rights Equity Shares in dematerialised mode is one Equity Share.

Joint Holders

Where two or more persons are registered as the holders of any Equity Shares, they shall be deemed to hold the same as the joint holders with the benefit of survivorship subject to the provisions contained in our Articles of Association. In case of Equity Shares held by joint holders, the Application submitted in physical mode to the Designated Branch of the SCSBs would be required to be signed by all the joint holders (in the same order as appearing in the records of the Depository) to be considered as valid for allotment of Equity Shares offered in this Issue.

Nomination

Nomination facility is available in respect of the Equity Shares in accordance with the provisions of the Section 72 of the Companies Act, 2013 read with Rule 19 of the Companies (Share Capital and Debenture) Rules, 2014.

Since the Allotment is in dematerialised form, there is no need to make a separate nomination for the Equity Shares to be allotted in this Issue. Nominations registered with the respective DPs of the Shareholders would prevail. Any Shareholders holding Equity Shares in dematerialised form and desirous of changing the existing nomination is requested to inform its Depository Participant.

Arrangements for Disposal of Odd Lots

The Equity Shares shall be traded in dematerialised form only and, therefore, the marketable lot shall be One Equity Share and hence, no arrangements for disposal of odd lots are required.

Notices

In accordance with the SEBI ICDR Regulations and the SEBI Relaxation Circulars, the Abridged Letter of Offer, the Application Form, the Rights Entitlement Letter and other Issue material will be sent/ dispatched only to the Eligible Equity Shareholders who have provided Indian address. In case such Eligible Equity Shareholders have provided their valid e-mail address, the Abridged Letter of Offer, the Application Form, the Rights Entitlement Letter and other Issue material will be sent only to their valid e-mail address and in case such Eligible Equity Shareholders have not provided their e-mail address, then the Abridged Letter of Offer, the Application Form, the Rights Entitlement Letter and other Issue material will be dispatched, on a reasonable effort basis, to the Indian addresses provided by them.

Further, this Draft Letter of offer will be sent/ dispatched to the Eligible Equity Shareholders who have provided Indian address and who have made a request in this regard. In case such Eligible Equity Shareholders have provided their valid e-mail address, the Draft Letter of offer will be sent only to their valid e-mail address and in case such Eligible Equity Shareholders have not provided their e-mail address, then the Draft Letter of offer will be dispatched, on a reasonable effort basis, to the Indian addresses provided by them.

All notices to the Eligible Equity Shareholders required to be given by our Company shall be published in one English language national daily newspaper with wide circulation and one **Hindi language national daily** newspaper with wide circulation being the **regional language of Delhi, where our Registered Office is situated.**

This Letter of offer, the Abridged Letter of Offer and the Application Form shall also be submitted with the Stock Exchanges for making the same available on their websites.

Offer to Non-Resident Eligible Equity Shareholders/Shareholders

As per Rule 7 of the FEMA Rules, RBI has given general permission to Indian companies to issue Equity Shares to non-resident Equity Shareholders including additional Equity Shares. Further, as per the Master Direction on Foreign Investment in India dated January 4, 2018 issued by RBI, non-residents may, amongst other things, (i) subscribe for additional shares over and above their Rights Entitlements; (ii) renounce the shares offered to them either in full or part thereof in favour of a person named by them; or (iii) apply for the shares renounced in their favour. Applications received from NRIs and non-residents for allotment of Equity Shares shall be, amongst other things, subject to the conditions imposed from time to time by RBI under FEMA in the matter of Application, refund of Application Money, Allotment of Equity Shares and issue of Rights Entitlement Letters/ letters of Allotment/Allotment advice. If a non-resident or NRI Shareholders has specific approval from RBI or any other governmental authority, in connection with his shareholding in our Company, such person should enclose a copy of such approval with the Application details and send it to the Registrar at info@masserv.com. It will be the sole responsibility of the Shareholders to ensure that the necessary approval from the RBI or the governmental authority is valid in order to make any investment in the



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Issue and Our Company will not be responsible for any such allotments made by relying on such approvals.

The Abridged Letter of Offer, the Rights Entitlement Letter and Application Form shall be sent only to the Indian addresses of the non-resident Eligible Equity Shareholders on a reasonable efforts basis, who have provided an Indian address to our Company and located in jurisdictions where the offer and sale of the Equity Shares may be permitted under laws of such jurisdictions, Eligible Equity Shareholders can access this Letter Offer, the Abridged Letter of Offer and the Application Form (provided that the Eligible Equity Shareholder is eligible to subscribe for the Equity Shares under applicable securities laws) from the websites of the Registrar, our Company and the Stock Exchanges. Further, Application Forms will be made available at Registered and Corporate Office of our Company for the non-resident Indian Applicants. Our Board may at its absolute discretion, agree to such terms and conditions as may be stipulated by RBI while approving the Allotment. The Equity Shares purchased by non-residents shall be subject to the same conditions including restrictions in regard to the repatriation as are applicable to the original Equity Shares against which Equity Shares are issued on rights basis.

In case of change of status of holders, *i.e.*, from resident to non-resident, a new demat account must be opened. Any Application from a demat account which does not reflect the accurate status of the Applicant is liable to be rejected at the sole discretion of our Company.

Please also note that pursuant to Circular No. 14 dated September 16, 2003 issued by RBI, Overseas Corporate Bodies ("OCBs") have been derecognized as an eligible class of Shareholders and RBI has subsequently issued the Foreign Exchange Management (Withdrawal of General Permission to Overseas Corporate Bodies (OCBs)) Regulations, 2003. Any Shareholders being an OCB is required not to be under the adverse notice of RBI and in order to apply for this issue as an incorporated non-resident must do so in accordance with the FDI Circular 2020 and Foreign Exchange Management (Non-Debt Instrument) Rules, 2019.

The non-resident Eligible Equity Shareholders can update their Indian address in the records maintained by the Registrar and our Company by submitting their respective copies of self-attested proof of address, passport, etc. at info@masserv.com.

ALLOTMENT OF THE EQUITY SHARES IN DEMATERIALIZED FORM

PLEASE NOTE THAT THE EQUITY SHARES APPLIED FOR IN THIS ISSUE CAN BE ALLOTTED ONLY IN DEMATERIALIZED FORM AND TO THE SAME DEPOSITORY ACCOUNT IN WHICH OUR EQUITY SHARES ARE HELD BY SUCH SHAREHOLDERS ON THE RECORD DATE. FOR DETAILS, SEE "ALLOTMENT ADVICE OR REFUND/ UNBLOCKING OF ASBA ACCOUNTS" AS MENTIONED ABOVE

Issue Schedule

Last date for credit of Rights entitlements	[•]
Issue opening date	[•]
Last Date on Market Renunciation Of Rights Entitlements #	[•]
Issue Closing Date*	[•]
Finalisation Of Basis Of Allotment (On Or About)	[•]
Date Of Allotment (On Or About)	[•]
Date Of Credit (On Or About)	[•]



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Date Of Listing (On Or About)	[●]
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Eligible Equity Shareholders are requested to ensure that renunciation through off-market transfer is completed in such a manner that the Rights Entitlements are credited to the demat account of the Renouncees on or prior to the Issue Closing Date.

** Our Board or a duly authorized committee thereof will have the right to extend the Issue Period as it may determine from time to time but not exceeding 30 days from the Issue Opening Date (inclusive of the Issue Opening Date). Further, no withdrawal of Application shall be permitted by any Applicant after the Issue Closing Date.*

Please note that if Eligible Equity Shareholders holding Equity Shares in physical form as on Record Date, have not provided the details of their demat accounts to our Company or to the Registrar, they are required to provide their demat account details to our Company or the Registrar not later than two Working Days prior to the Issue Closing Date, *i.e.*, [●], 2022 to enable the credit of the Rights Entitlements by way of transfer from the demat suspense escrow account to their respective demat accounts, at least one day before the Issue Closing Date, *i.e.*, [●], 2022.

Basis of Allotment

Subject to the provisions contained in this Draft Letter of offer, the Abridged Letter of Offer, the Rights Entitlement Letter, the Application Form, the Articles of Association and the approval of the Designated Stock Exchange, our Board will proceed to allot the Equity Shares in the following order of priority:

- (a) Full Allotment to those Eligible Equity Shareholders who have applied for their Rights Entitlements of Equity Shares either in full or in part and also to the Renouncee(s) who has or have applied for Equity Shares renounced in their favour, in full or in part.
- (b) Eligible Equity Shareholders whose fractional entitlements are being ignored and Eligible Equity Shareholders with zero entitlement, would be given preference in allotment of one additional Equity Share each if they apply for additional Equity Shares. Allotment under this head shall be considered if there are any unsubscribed Equity Shares after allotment under (a) above. If number of Equity Shares required for Allotment under this head are more than the number of Equity Shares available after Allotment under (a) above, the Allotment would be made on a fair and equitable basis in consultation with the Designated Stock Exchange and will not be a preferential allotment.
- (c) Allotment to the Eligible Equity Shareholders who having applied for all the Equity Shares offered to them as part of this Issue, have also applied for additional Equity Shares. The Allotment of such additional Equity Shares will be made as far as possible on an equitable basis having due regard to the number of Equity Shares held by them on the Record Date, provided there are any unsubscribed Equity Shares after making full Allotment in (a) and (b) above. The Allotment of such Equity Shares will be at the sole discretion of our Board in consultation with the Designated Stock Exchange, as a part of this Issue and will not be a preferential allotment.
- (d) Allotment to Renouncees who having applied for all the Equity Shares renounced in their favour, have applied for additional Equity Shares provided there is surplus available after making full Allotment under (a), (b) and (c) above. The Allotment of such Equity Shares will be

made on a proportionate basis in consultation with the Designated Stock Exchange, as a part of this Issue and will not be a preferential allotment.

- (e) Allotment to any other person, subject to applicable laws, that our Board may deem fit, provided there is surplus available after making Allotment under (a), (b), (c) and (d) above, and the decision of our Board in this regard shall be final and binding.

After taking into account Allotment to be made under (a) to (d) above, if there is any unsubscribed portion, the same shall be deemed to be 'unsubscribed'.

Upon approval of the Basis of Allotment by the Designated Stock Exchange, the Registrar shall send to the Controlling Branches, a list of the Shareholders who have been allocated Equity Shares in this Issue, along with:

- i) The amount to be transferred from the ASBA Account to the separate bank account opened by our Company for this Issue, for each successful Application;
- ii) The date by which the funds referred to above, shall be transferred to the aforesaid bank account; and
- iii) The details of rejected ASBA applications, if any, to enable the SCSBs to unblock the respective ASBA Accounts.

Further, the list of Applicants eligible for refund with corresponding amount will also be shared with Escrow Collection Bank(s) to refund such Applicants.

ALLOTMENT ADVICE OR REFUND/ UNBLOCKING OF ASBA ACCOUNTS

Our Company will send/ dispatch Allotment advice, refund intimations or demat credit of securities and/or letters of regret, only to the Eligible Equity Shareholders who have provided Indian address. In case such Eligible Equity Shareholders have provided their valid e-mail address, Allotment advice, refund intimations or demat credit of securities and/or letters of regret will be sent only to their valid e-mail address and in case such Eligible Equity Shareholders have not provided their e-mail address, then the Allotment advice, refund intimations or demat credit of securities and/or letters of regret will be dispatched, on a reasonable effort basis, to the Indian addresses provided by them; along with crediting the Allotted Equity Shares to the respective beneficiary accounts (only in dematerialised mode) or in a demat suspense account (in respect of Eligible Equity Shareholders holding Equity Shares in physical form on the Allotment Date) or issue instructions for unblocking the funds in the respective ASBA Accounts, if any, within a period of 4 days from the Issue Closing Date. In case of failure to do so, our Company and our Directors who are "officers in default" shall pay interest at 15% p.a. and such other rate as specified under applicable law from the expiry of such 4 days' period.

The Rights Entitlements will be credited in the dematerialized form using electronic credit under the depository system and the Allotment advice shall be sent, through an e-mail, to the e-mail address provided to our Company or at the address recorded with the Depository.

In the case of non-resident Shareholders who remit their Application Money from funds held in the NRE or the FCNR Accounts, unblocking and/or payment of interest or dividend and other disbursements, if any, shall be credited to such accounts.

Where an Applicant has applied for additional Equity Shares in the Issue and is allotted a lesser number of Equity Shares than applied for, the excess Application Money paid/blocked shall be refunded/unblocked. The unblocking of ASBA funds / refund of monies shall be completed within such period as prescribed under the SEBI ICDR Regulations. In the event that there is a delay in making refunds beyond such period as prescribed under applicable law, our Company shall pay the requisite interest at such rate as prescribed under applicable law.

PAYMENT OF REFUND

Mode of making refunds

The payment of refund, if any, including in the event of oversubscription or failure to list or otherwise would be done through any of the following modes.

Unblocking amounts blocked using ASBA facility.

NACH - National Automated Clearing House is a consolidated system of electronic clearing service. Payment of refund would be done through NACH for Applicants having an account at one of the centres specified by RBI, where such facility has been made available. This would be subject to availability of complete bank account details including MICR code wherever applicable from the depository. The payment of refund through NACH is mandatory for Applicants having a bank account at any of the centres where NACH facility has been made available by RBI (subject to availability of all information for crediting the refund through NACH including the MICR code as appearing on a cheque leaf, from the depositories), except where Applicant is otherwise disclosed as eligible to get refunds through NEFT or Direct Credit or RTGS.

National Electronic Fund Transfer ("NEFT") - Payment of refund shall be undertaken through NEFT wherever the Shareholders' bank has been assigned the Indian Financial System Code ("**IFSC Code**"), which can be linked to a MICR, allotted to that particular bank branch. IFSC Code will be obtained from the website of RBI as on a date immediately prior to the date of payment of refund, duly mapped with MICR numbers. Wherever the Shareholders have registered their nine digit MICR number and their bank account number with the Registrar to our Company or with the Depository Participant while opening and operating the demat account, the same will be duly mapped with the IFSC Code of that particular bank branch and the payment of refund will be made to the Shareholders through this method.

Direct Credit - Shareholders having bank accounts with the Banker(s) to the Issue shall be eligible to receive refunds through direct credit. Charges, if any, levied by the relevant bank(s) for the same would be borne by our Company

RTGS - If the refund amount exceeds Rs. 2,00,000, the Shareholders have the option to receive refund through RTGS. Such eligible Shareholders who indicate their preference to receive refund through RTGS are required to provide the IFSC Code in the Application Form. In the event the same is not provided, refund shall be made through NACH or any other eligible mode. Charges, if any, levied by the Refund Bank(s) for the same would be borne by our Company. Charges, if any, levied by the Shareholder's bank receiving the credit would be borne by the Shareholders.



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For all other Shareholders, the refund orders will be dispatched through speed post or registered post subject to applicable laws. Such refunds will be made by cheques, pay orders or demands drawn in favour of the sole/first Shareholders and payable at par.

Credit of refunds to Shareholders in any other electronic manner, permissible by SEBI from time to time.

Refund payment to non-residents

The Application Money will be unblocked in the ASBA Account of the non-resident Applicants, details of which were provided in the Application Form.

ALLOTMENT ADVICE OR DEMAT CREDIT OF SECURITIES

Receipt of the Equity Shares in Dematerialized Form

The demat credit of securities to the respective beneficiary accounts will be credited within 15 days from the Issue Closing Date or such other timeline in accordance with applicable laws.

PLEASE NOTE THAT THE EQUITY SHARES APPLIED FOR UNDER THIS ISSUE CAN BE ALLOTTED ONLY IN DEMATERIALIZED FORM AND TO (A) THE SAME DEPOSITORY ACCOUNT/ CORRESPONDING PAN IN WHICH THE EQUITY SHARES ARE HELD BY SUCH SHAREHOLDERS ON THE RECORD DATE, OR (B) THE DEPOSITORY ACCOUNT, DETAILS OF WHICH HAVE BEEN PROVIDED TO OUR COMPANY OR THE REGISTRAR AT LEAST TWO WORKING DAYS PRIOR TO THE ISSUE CLOSING DATE BY THE ELIGIBLE EQUITY SHAREHOLDER HOLDING EQUITY SHARES IN PHYSICAL FORM AS ON THE RECORD DATE.

Shareholders shall be allotted the Equity Shares in dematerialized (electronic) form. Our Company has signed an agreement with NSDL and with CDSL which enables the Shareholders to hold and trade in the securities issued by our Company in a dematerialized form, instead of holding the Equity Shares in the form of physical certificates.

SHAREHOLDERS MAY PLEASE NOTE THAT THE EQUITY SHARES CAN BE TRADED ON THE STOCK EXCHANGES ONLY IN DEMATERIALIZED FORM.

The procedure for availing the facility for Allotment of Equity Shares in this Issue in the dematerialized form is as under:

- i) Open a beneficiary account with any depository participant (care should be taken that the beneficiary account should carry the name of the holder in the same manner as is registered in the records of our Company. In the case of joint holding, the beneficiary account should be opened carrying the names of the holders in the same order as registered in the records of our Company). In case of Shareholders having various folios in our Company with different joint holders, the Shareholders will have to open separate accounts for such holdings. Those Shareholders who have already opened such beneficiary account(s) need not adhere to this step.
- ii) It should be ensured that the depository account is in the name(s) of the Shareholders and the names are in the same order as in the records of our Company or the Depositories.



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- iii) The responsibility for correctness of information filled in the Application Form *vis-a-vis* such information with the Shareholder's depository participant, would rest with the Shareholders. Shareholders should ensure that the names of the Shareholders and the order in which they appear in Application Form should be the same as registered with the Shareholder's depository participant.
- iv) If incomplete or incorrect beneficiary account details are given in the Application Form, the Shareholders will not get any Equity Shares and the Application Form will be rejected.
- v) The Equity Shares will be allotted to Applicants only in dematerialized form and would be directly credited to the beneficiary account as given in the Application Form after verification or demat suspense account (pending receipt of demat account details for resident Eligible Equity Shareholders holding Equity Shares in physical form/ with IEPF authority/ in suspense, etc.). Allotment advice, refund order (if any) would be sent directly to the Applicant by e-mail and, if the printing is feasible, through physical dispatch, by the Registrar but the Applicant's depository participant will provide to him the confirmation of the credit of such Equity Shares to the Applicant's depository account.
- vi) Non-transferable Allotment advice/ refund intimation will be directly sent to the Shareholders by the Registrar, by e-mail and, if the printing is feasible, through physical dispatch.
- vii) Renounees will also have to provide the necessary details about their beneficiary account for Allotment of Equity Shares in this Issue. In case these details are incomplete or incorrect, the Application is liable to be rejected.

IMPERSONATION

As a matter of abundant caution, attention of the Shareholders is specifically drawn to the provisions of Section 38 of the Companies Act, 2013 which is reproduced below:

"Any person who makes or abets making of an application in a fictitious name to a company for acquiring, or subscribing for, its securities; or makes or abets making of multiple applications to a company in different names or in different combinations of his name or surname for acquiring or subscribing for its securities; or otherwise induces directly or indirectly a company to allot, or register any transfer of, securities to him, or to any other person in a fictitious name, shall be liable for action under Section 447."

The liability prescribed under Section 447 of the Companies Act, 2013 for fraud involving an amount of at least Rs. 0.1 crore or 1% of the turnover of the company, whichever is lower, includes imprisonment for a term of not less than six months extending up to 10 years (provided that where the fraud involves public interest, such term shall not be less than three years) and fine of an amount not less than the amount involved in the fraud, extending up to three times of such amount. In case the fraud involves (i) an amount which is less than Rs. 0.1 crore or 1% of the turnover of the company, whichever is lower; and (ii) does not involve public interest, then such fraud is punishable with an imprisonment for a term extending up to five years or a fine of an amount extending up to Rs. 0.5 crore or with both.

UTILISATION OF ISSUE PROCEEDS

Our Board declares that:

- A. All monies received out of this Issue shall be transferred to a separate bank account;



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- B. Details of all monies utilized out of this Issue referred to under (A) above shall be disclosed, and continue to be disclosed till the time any part of the Issue Proceeds remains unutilised, under an appropriate separate head in the balance sheet of our Company indicating the purpose for which such monies have been utilised; and
- C. Details of all unutilized monies out of this Issue referred to under (A) above, if any, shall be disclosed under an appropriate separate head in the balance sheet of our Company indicating the form in which such unutilized monies have been invested.

UNDERTAKINGS BY OUR COMPANY

Our Company undertakes the following:

- i) The complaints received in respect of this Issue shall be attended to by our Company expeditiously and satisfactorily.
- ii) All steps for completion of the necessary formalities for listing and commencement of trading at all Stock Exchanges where the Equity Shares are to be listed will be taken by our Board within seven Working Days of finalization of Basis of Allotment.
- iii) The funds required for making refunds / unblocking to unsuccessful Applicants as per the mode(s) disclosed shall be made available to the Registrar by our Company.
- iv) Where refunds are made through electronic transfer of funds, a suitable communication shall be sent to the Shareholders within 4 days of the Issue Closing Date, giving details of the banks where refunds shall be credited along with amount and expected date of electronic credit of refund.
- v) In case of refund / unblocking of the Application Money for unsuccessful Applicants or part of the Application Money in case of proportionate Allotment, a suitable communication shall be sent to the Applicants.
- vi) Adequate arrangements shall be made to collect all ASBA Applications.
- vii) Our Company shall comply with such disclosure and accounting norms specified by SEBI from time to time.

SHAREHOLDERS GRIEVANCES, COMMUNICATION AND IMPORTANT LINKS

1. Please read this Draft Letter of offer carefully before taking any action. The instructions contained in the Application Form, Abridged Letter of Offer and the Rights Entitlement Letter are an integral part of the conditions of this Draft Letter of offer and must be carefully followed; otherwise the Application is liable to be rejected.
2. All enquiries in connection with this Draft Letter of offer, the Abridged Letter of Offer, the Rights Entitlement Letter or Application Form must be addressed (quoting the Registered Folio Number in case of Eligible Equity Shareholders who hold Equity Shares in physical form as on Record Date or the DP ID and Client ID number, the Application Form number and the name of the first Eligible Equity Shareholder as mentioned on the Application Form and super scribed "[•]")



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on the envelope and postmarked in India or in the e-mail) to the Registrar at the following address:

MAS SERVICES LIMITED

T-34, 2nd Floor,
Okhla Industrial Area Phase - II,
New Delhi - 110020
Tel No.: +91-11-26387281/82/83
Fax No.: +91-11-26387384
Website: www.masserv.com
E-mail ID: info@masserv.com
Contact Person: Mr. Sharwan Mangla
SEBI Registration No: INR000000049

3. In accordance with SEBI Rights Issue Circulars, frequently asked questions and online/ electronic dedicated Shareholders helpdesk for guidance on the Application process and resolution of difficulties faced by the Shareholders will be available on the website of the Registrar www.masserv.com. Further, helpline number provided by the Registrar for guidance on the Application process and resolution of difficulties is +91-11-26387281/82/83.

(i) The Shareholders can visit following links for the below-mentioned purposes:

4. Frequently asked questions and online/ electronic dedicated Shareholders helpdesk for guidance on the Application process and resolution of difficulties faced by the Shareholders: www.masserv.com.
5. Updation of Indian address/ e-mail address/ phone or mobile number in the records maintained by the Registrar or our Company: www.masserv.com.
6. Updation of demat account details by Eligible Equity Shareholders holding shares in physical form: www.masserv.com.
7. Submission of self-attested PAN, client master sheet and demat account details by non- resident Eligible Equity Shareholders: info@masserv.com.

a) This Issue will remain open for a minimum 7 days. However, our Board will have the right to extend the Issue Period as it may determine from time to time but not exceeding 30 days from the Issue Opening Date (inclusive of the Issue Opening Date).



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RESTRICTIONS ON FOREIGN OWNERSHIP OF INDIAN SECURITIES

Foreign investment in Indian securities is regulated through the Industrial Policy, 1991, of the Government of India and FEMA. While the Industrial Policy, 1991, of the Government of India, prescribes the limits and the conditions subject to which foreign investment can be made in different sectors of the Indian economy, FEMA regulates the precise manner in which such investment may be made. The Union Cabinet, as provided in the Cabinet Press Release dated May 24, 2017, has given its approval for phasing out the FIPB. Under the Industrial Policy, 1991, unless specifically restricted, foreign investment is freely permitted in all sectors of the Indian economy up to any extent and without any prior approvals, but the foreign investor is required to follow certain prescribed procedures for making such investment. Accordingly, the process for foreign direct investment ("FDI") and approval from the Government of India will now be handled by the concerned ministries or departments, in consultation with the Department for Promotion of Industry and Internal Trade, Ministry of Commerce and Industry, Government of India (formerly known as the Department of Industrial Policy and Promotion) ("DPIIT"), Ministry of Finance, Department of Economic Affairs, FIPB section, through a memorandum dated June 5, 2017, has notified the specific ministries handling relevant sectors.

The Government has, from time to time, made policy pronouncements on FDI through press notes and press releases. The DPIIT issued the Consolidated FDI Policy Circular of 2020 ("FDI Circular 2020"), which, with effect from October 15, 2020, consolidated and superseded all previous press notes, press releases and clarifications on FDI issued by the DPIIT that were in force and effect as on October 15, 2020. The Government proposes to update the consolidated circular on FDI policy once every year and therefore, FDI Circular 2020 will be valid until the DPIIT issues an updated circular.

The Government of India has from time to time made policy pronouncements on FDI through press notes and press releases which are notified by RBI as amendments to FEMA. In case of any conflict, the relevant notification under Foreign Exchange Management (Non-Debt Instruments) Rules, 2019 will prevail. The payment of inward remittance and reporting requirements are stipulated under the Foreign Exchange Management (Mode of Payment and Reporting of Non-Debt Instruments) Regulations, 2019 issued by RBI. The FDI Circular 2020, issued by the DPIIT, consolidates the policy framework in place as on October 15, 2020, and supersedes all previous press notes, press releases and clarifications on FDI issued by the DPIIT that were in force and effect as on October 15, 2020.

The transfer of shares between an Indian resident and a non-resident does not require the prior approval of RBI, provided that (i) the activities of the investee company falls under the automatic route as provided in the FDI Policy and FEMA and transfer does not attract the provisions of the Takeover Regulations; (ii) the non-resident shareholding is within the sectorial limits under the FDI Policy; and (iii) the pricing is in accordance with the guidelines prescribed by SEBI and RBI.

No investment under the FDI route (i.e. any investment which would result in the investor holding 10% or more of the fully diluted paid-up equity share capital of the Company or any FDI investment for which an approval from the government was taken in the past) will be allowed in the Issue unless such application is accompanied with necessary approval or covered under a pre-existing approval from the government. It will be the sole responsibility of the investors to ensure that the necessary approval or the pre-existing approval from the government is valid in order to make any investment in the Issue. Our Company will not be responsible for any allotments made by relying on such approvals.



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Please also note that pursuant to Circular no. 14 dated September 16, 2003 issued by RBI, Overseas Corporate Bodies ("OCBs") have been derecognized as an eligible class of investors and RBI has subsequently issued the Foreign Exchange Management (Withdrawal of General Permission to Overseas Corporate Bodies (OCBs)) Regulations, 2003. Any Investor being an OCB is required not to be under the adverse notice of RBI and in order to apply for this issue as a incorporated non-resident must do so in accordance with the FDI Circular 2020 and Foreign Exchange Management (Non-Debt Instrument) Rules, 2019. Further, while investing in the Issue, the Investors are deemed to have obtained the necessary approvals, as required, under applicable laws and the obligation to obtain such approvals shall be upon the Investors. Our Company shall not be under an obligation to obtain any approval under any of the applicable laws on behalf of the Investors and shall not be liable in case of failure on part of the Investors to obtain such approvals.

The above information is given for the benefit of the Applicants / Investors. Our Company is not liable for any amendments or modification or changes in applicable laws or regulations, which may occur after the date of this Draft Letter of Offer. Investors are advised to make their independent investigations and ensure that the number of Equity Shares applied for do not exceed the applicable limits under laws or regulations.



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STATUTORY AND OTHER INFORMATION

Please note that the Rights Equity Shares applied for under this Issue can be allotted only in dematerialized form and to (a) the same depository account/ corresponding pan in which the Equity Shares are held by such Investor on the Record Date, or (b) the depository account, details of which have been provided to our Company or the Registrar at least two working days prior to the Issue Closing Date by the Eligible Equity Shareholder holding Equity Shares in physical form as on the Record Date, or (c) demat suspense account where the credit of the Rights Entitlements returned/reversed/failed.

SECTION IX - OTHER INFORMATION

MATERIAL CONTRACTS AND DOCUMENTS FOR INSPECTION

The copies of the following documents and contracts referred to in para (A) have been entered or are to be entered into by our Company (not being contracts entered into in the ordinary course of business carried on by our Company or contracts entered into more than two years before the date of this Draft Letter of Offer.

Copies of the above mentioned contracts and also the documents for inspection referred to in para (B), may be inspected at the Registered Office and Corporate Office between 10 a.m. and 5 p.m. on all Working Days from the date of this Draft Letter of Offer until the closure of the subscription list.

Any of the contracts or documents mentioned in this Draft Letter of Offer may be amended or modified at any time if so required in the interest of our Company or if required by the other parties, without reference to the Shareholders, subject to compliance of the provisions contained in the Companies Act and other applicable law.

A) MATERIAL CONTRACTS

1. Agreement dated 24th May, 2022 between our Company and M/s MAS Services Limited, Registrar to the Issue.
2. Tripartite Agreement dated 25th July, 2018 between our Company, National Securities Depository Ltd. (NSDL) and Registrar to the Issue;
3. Tripartite Agreement dated 4th July, 2018 between our Company, Central Depository Services (India) Limited (CDSL) and Registrar to the Issue;
4. Banker(s) to the Issue Agreement dated [●] amongst our Company and the Registrar to the Issue and the Escrow Collection Bank(s).

(B) DOCUMENTS FOR INSPECTION

5. Certified copies of the Memorandum of Association and Articles of Association of our Company as amended from time to time.
6. Certificate of Incorporation dated 26th July, 2005.
7. Copy of the resolution of the Board of Directors under Section 62 of the Companies Act passed in its meeting dated 9th April, 2022 authorizing the Issue.
8. Copy of the resolution passed by the Right Issue Committee dated 25th May, 2022 approving the Draft letter of offer.
9. Resolution passed by the Right Issue Committee dated [●] determining the Record date.



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10. Consents of the Directors, Company Secretary and Compliance Officer, Legal Advisors to the Issue, Statutory Auditor and Registrar to the Issue to include their names in the Offer Document to act in their respective capacities;
11. Annual reports of our Company for the financial years ended March 31, 2019, 2020 and 2021 and Unaudited Standalone and Consolidated financial results for the nine months ended 31st December, 2021;
12. A statement of tax benefits dated 23rd May, 2022 received from M/s. Dharam Taneja Associates, Chartered Accountants, Statutory Auditor regarding tax benefits available to our Company and its shareholders;
13. Certificate dated 23rd May, 2022 from M/s. Dharam Taneja Associates, Chartered Accountants regarding "Sources & deployment of funds";
14. In-principle listing approval(s) dated [●] from National Stock Exchange of India Limited;

Any of the contracts or documents mentioned in the Draft Letter of Offer may be amended or modified at any time if so required in the interest of our Company or if required by the other parties, without reference to the Equity Shareholders, subject to compliance with applicable law.



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DECLARATION

We hereby declare that all relevant provisions of the Companies Act and the guidelines/regulations issued by the Government of India or the guidelines/regulations issued by the Securities and Exchange Board of India, established under section 3 of the Securities and Exchange Board of India Act, 1992, as the case may be, have been complied with and no statement made in this Draft Letter of Offer is contrary to the provisions of the Companies Act, the Securities and Exchange Board of India Act, 1992 or the rules made or guidelines or regulations issued thereunder, as the case may be. We further certify that all statements in this Draft Letter of Offer are true and correct.

Name	Signature
Mr. Rajeev Goel Non Executive Director DIN: 01507297	Sd/-
Mrs. Mahima Goel Managing Director DIN: 02205003	Sd/-
Mr. Rahul Bajaj Executive and Non Independent Director DIN: 03408766	Sd/-
Mr. Rao Laxman Singh Non Executive and Independent Director DIN: 08055192	Sd/-
Mr. Rakesh Mohan Non Executive and Independent Director DIN: 07352915	Sd/-
Mrs. Chetna Non Executive and Independent Director DIN: 08981045	Sd/-
Mr. Rahul Bajaj Chief Financial Officer PAN: AOUPB5442B	Sd/-
Ms. Mahak Company Secretary and Compliance officer PAN: FKTPM5018L	Sd/-

Place: Delhi
Date: 25th May, 2022