



MMTC LIMITED

**Regd. Office : Core-1, 'SCOPE Complex', 7 Institutional Area,
Lodhi Road, New Delhi - 110 003
CIN : L51909DL1963GOI004033**

BOARD OF DIRECTORS

CMD AND FUNCTIONAL DIRECTORS

Shri Sanjay Chadha, Chairman & Managing Director (Addl. Charge) (upto 28.2.2022)
Shri Vibhu Nayar, Chairman & Managing Director (Addl. Charge) (1.3.2022 - 31.8.2022)
Shri Hardeep Singh, Chairman & Managing Director (Addl.Charge) (w.e.f. 27.10.2022)
Shri J.Ravi Shanker, Director (Marketing)
Shri Rajiv Ranjan Sinha, Director (Personnel)
Shri Kapil Kumar Gupta, Director (Finance)

GOVERNMENT NOMINEE DIRECTORS

Shri Shashank Priya, Special Secretary & Financial Advisor, DoC
Shri Shyamal Misra, Joint Secretary, DoC (upto 07.12.2021)
Shri Vipul Bansal, Joint Secretary, DoC (w.e.f. 20.12.2021)

NON-OFFICIAL INDEPENDENT DIRECTORS

Dr.(Mrs.) Swadhinta Krishna
Dr. Pradip Kumar Varma (w.e.f.13.11.2021)

COMPANY SECRETARY

Shri G. Anandanarayanan

REGISTRAR & SHARE TRANSFER AGENT

MCS Shares Transfer Agent Limited
F-65, 1st Floor, Okhla Industrial Area,
Phase-1, New Delhi-110020
Tel: 011-41406150
E-mail: admin@mcregistrars.com

BANKERS

State Bank of India (Consortium Leader)

STATUTORY AUDITORS

M/s. M.L. Puri & Co.
Chartered Accountants
407, New Delhi House
27, Barakhamba Road
New Delhi - 110 001

SECRETARIAL AUDITORS

M/s. VAP & Associates
Company Secretaries
387, 1st Floor, Shakti Khand
Indirapuram,
Ghaziabad - 201010



Contents

● Corporate Mission/Corporate Objective.....	04
● Chairman's Statement.....	05-06
● Directors' Report.....	07-15
● Management Discussion & Analysis Report.....	16-18
● Annual Report on CSR Activities for Financial Year 2021-22.....	19-21
● Report on Corporate Governance.....	22-35
● MMTC Business Responsibility Report Financial Year 2021-22.....	36-43
● Secretarial Audit Report & Management Reply thereon.....	44-50
● Comments of C&AG of India.....	51
● Statutory Audit Report & Management Reply thereon.....	62-80
● Financial Statements of MMTC Limited.....	82-137
● Financial Statements of MMTC Transnational Pte. Ltd. Singapore.....	139-162
● Consolidated Financial Statements.....	163-236
● Auditors.....	237

Corporate Mission

As the largest trading company of India and a major trading company of Asia, MMTC aims at improving its position further by achieving sustainable and viable growth rate through excellence in all its activities, generating optimum profits through total satisfaction of shareholders, customers, suppliers, employees and society.

Corporate Objectives

- To be a leading International Trading House in India operating in the competitive global trading environment, with focus on “bulk” as core competency and to improve returns on capital employed.
- To retain the position of single largest trader in the country for product lines like minerals, metals and precious metals.
- To render high quality of service to all categories of customers with professionalism and efficiency.
- To provide support services to the medium and small scale sectors.
- To streamline system within the company for settlement of commercial disputes.
- To promote development of trade-related infrastructure.



CHAIRMAN'S STATEMENT



Dear Shareholders,

I welcome each one of you at the 59th Annual General Meeting of MMTC Limited. It is a pleasure to connect with you all, although in virtual mode. On behalf of the MMTC Board of Directors, I want to thank you for taking out the time to join us. The report of the Directors and Audited Accounts for the year ended on 31st March 2022, with the Reports of Statutory Auditors and communication from the office of Comptroller and Auditor General with NIL comments for this year have already been circulated to the shareholders, and with your permission, I shall take them as read. The past years have indeed been challenging in many ways.

Due to Government's new Public Sector Policy as per which there will be a bare minimum presence of PSEs limited to strategic sectors only as a result of which MMTC being in non-strategic sector has been directed by Deptt. of

Commerce to prepare a road map to wind down its business operations including exit from various JVs in a phased manner. Also, VRS is being introduced to downsize the manpower.

Key performance highlights

The impact of above is visible in the annual results. The company recorded a turnover of Rs. 7840.78 crores as against Rs. 26,364.50 Cr. achieved in FY 2020-21, with a net loss of Rs. 241.93 Cr. in 2021-22.

- Disinvestment of NINL (a joint venture company wherein MMTC was the Managing Promoter), through DIPAM was completed during the current financial year with the Tata Long Products taking control of NINL, MMTC received Rs. 5335 crores towards working capital loan/advance/ trade credit extended to NINL in the past along with interest upto 31.3.2021 (Rs. 3463.11 crores) and Rs. 1872.35 crores against sale of its equity valued at Rs. 459.10 crores. Pursuant

to the receipt of proceeds from sale of MMTC's stake in NINL, the company has repaid loans taken from various banks under the Loan Restructuring mechanism of RBI and final settlement is under process. However, company's liquidity position remain under stress considering payables including contingent liabilities.

- The Execution Petition No.19/2018 filed by Anglo Coal against MMTC post Hon'ble Supreme Court award in favour of Anglo Coal in respect of non-performance of coking coal contract is ongoing in Delhi High Court. MMTC deposited Rs.1088 crores approx. on 20.7.2022 as per the directions of Hon'ble Execution Court. Your company is in the process of exploring further steps as may be available to protect the interests of MMTC. Final amount may vary as per outcome of these steps.

CSR Policy, Sustainable Development & Corporate Governance

Your company's CSR Policy is in line with Section 135 of the Companies Act, 2013 and the CSR Rules as notified by the Ministry of Corporate Affairs and the CSR projects have been undertaken in terms of Section 135 of the Companies Act, 2013.

Your company incurred losses during FY 2019-20 and FY 2020-21. Accordingly, the CSR budget calculated in accordance with the Section 198 of the Companies Act, 2013 i.e. 2% of average net profit of preceding 3 years was negative. Therefore, there was no annual CSR budget approved by Board of Directors for the year 2021-22. As such, no fresh CSR project

was undertaken during FY 2021-22. However, MMTC executed ongoing CSR projects of 2019-20 which was carried forward to 2021-22.

Your company is fully committed to promoting and strengthening the principles of sound Corporate Governance norms. To this end, the company endeavours to comply fully the guidelines prescribed under SEBI, DPE and Companies Act, 2013.

Acknowledgement

I would like to express my sincere thanks and gratitude to our valued customers as well as other business partners for their continued confidence reposed in us, our employees for their engagement and perseverance, members of the Board for their guidance, and you, our esteemed shareholders for your support and trust in the company. I would like to thank various Ministries of Government of India, particularly the Department of Commerce, Ministry of Commerce & Industry for their valuable guidance and support in all our endeavours.

Hardeep Singh
Chairman & Managing Director
08/12/2022



DIRECTORS' REPORT

The Members
MMTC Limited,
New Delhi.

Ladies & Gentlemen,

On behalf of Board of Directors, I present the 59th Annual Report on your company's performance for the financial year ended 31st March 2022 along with Audited Statements of Accounts and Statutory Auditors' Report.

OPERATIONAL RESULTS

Your company has recorded a turnover of Rs.7840.78 crores during 2021-22 as against the turnover of Rs. 26,364.50 crores registered during last fiscal. This business turnover includes Exports of Rs.34.40 crores, Imports of Rs.7070.58 crores and domestic trade of Rs. 735.80 crores. The Company has reported a net loss of Rs. 241.93 crores during 2021-22 as compared to net loss of Rs. 769.69 crores reported during the previous financial year.

Company's performance during 2021-22 is given below: -

	(Rs. in crores)	(Rs. in crores)
	2021-22	2020-21
Sales of products	7,836.28	26,361.59
Sales of services	4.50	2.91
Other Trade Earnings	552.51	17.11
Total Revenue from Operations	8,393.29	26,381.61
Cost of Sales	7,799.79	26,267.23
Gross Profit from Operations	593.50	114.38
Add: Dividend and other Income	50.14	36.97
Less: Establishment & Administrative Overheads, etc.	160.56	163.33
Less: Debts/Claims Written off	0.02	5.80
Less: Provisions for Doubtful Debts/Claims/Advances/ Investments	1.05	1.06
Profit Before Interest, Depreciation and Amortization Expenses and Taxes	482.01	(18.84)
Less: Interest Paid(Net) (Interest Paid minus Interest earned)	201.64	193.26
Profit Before Depreciation and Amortization Expenses and Taxes	280.37	(212.10)
Less: Depreciation and Amortization Expenses	4.57	4.94
Less: Exceptional Items	155.20	877.17
Profit Before Taxes	120.60	(1,094.22)
Less: Provision for Current Taxes	21.50	0.07
Less: Provision for Deferred Taxes	341.03	(324.60)
Profit After Taxes	(241.93)	(769.69)
Add: Balance brought forward from the previous year	(308.86)	460.83
Balance		
Items of other comprehensive income recognized directly in retain earnings		
Items recognized directly in retain earnings	-	-
Dividend & Dividend Tax	-	-
Appropriations:		
General Reserve	-	-
Leaving a Balance to be carried forward	(550.79)	(308.86)

The performance of different business groups of your Company is highlighted in the Management Discussion and Analysis Report, which is annexed and forms part of this Report. Auditor / CAG report along with management replies and Notes to accounts contain important information affecting company financials such as Loan Re-structuring, Anglo Coal dispute, disinvestment of NINL, etc.

EQUITY SHARE CAPITAL & DIVIDEND

There is no change in equity capital of the company during the year. The paid up equity of the company stood at Rs. 150 crores comprising of 150 crores number of equity shares of the face value of Re.1/- each, as on 31.3.2022. The Board of Directors has not recommended any dividend for the year 2021-22 in view of current liquidity crunch, exhaustion of bank limits and difficulties in meeting its day-to-day working capital requirement and net loss of approx. Rs.241.93 crores incurred by the Company during the year 2021-22.

RESERVES

A sum of Rs.288.11 crores was available in the reserves and surplus of your Company as on 1st April, 2021. An amount of Rs.46.18 crores is available in "Reserves and Surplus" of your Company as on 31st March, 2022.

FOREIGN EXCHANGE EARNINGS AND OUTGO

The Foreign Exchange earnings and outgo of your Company during 2020-21 has been as under:-

	EARNINGS (Rs./Cr)		OUTGO (Rs./Cr)
Exports	116.68	Imports	5994.35
Others		Others	-
Total	116.68	Total	5994.35

SUBSIDIARY COMPANY

To tap South East Asian market for trading in commodities, MMTC Transnational Pte. Ltd. (MTPL), Singapore, the wholly owned subsidiary of your Company has been engaged in commodity trading and has established itself as a credible and reputable trading outfit in Singapore. During the financial year 2021-22 MTPL achieved sales turnover of USD 456.58 million as against USD 486.20 million recorded during last fiscal. The Net Profit of MTPL during the financial year 2021-22 amounted to USD 0.69 million as against USD 1.12 million earned during 2020-21. The net worth of MTPL stood at USD 6.17 million as on 31st March 2022. Overall dividend declared by MTPL since inception is USD 26.94 million which includes a dividend of USD 5.00 million received from MTPL during FY2021-22.

Pursuant to the provisions of Section 129 of the Companies Act, 2013, the audited financial statements of MTPL together with Directors' Report & Auditor's Report are attached herewith.

MMTC's Joint Venture - Neelachal Ispat Nigam Ltd. (NINL)

Your Company set up Neelachal Ispat Nigam Limited (NINL) – an Iron & Steel Plant of 1.1 million tonnes capacity, 0.8 million tone coke oven and by product unit with captive power plant, jointly with PSUs of Govt. of Odisha and other CPSEs.

Cabinet Committee on Economic Affairs (CCEA) on 8th Jan 2020 had given 'in principle' approval for strategic disinvestment of equity shareholding of MMTC (49.78%), NMDC (10.10%), MECON (0.68%), BHEL (0.68%), IPICOL (12.00%) and OMC (20.47%) in Neelachal Ispat Nigam Limited (NINL) to a strategic buyer, identified through a two-stage auction procedure. Accordingly, Department of Investment and Public Asset Management (DIPAM), under the aegis of Ministry of Finance carried out the due diligence process by appointing Transaction Advisor (TA), Legal Advisor (LA) & Asset Valuer (AV) and by conducting various Inter Ministerial Group (IMG), Evaluation Sub-Committee (ESC) meetings.

The Expression of Interest (EOI) for sale of NINL got completed on 29th March, 2021 and prospective bidders were shortlisted for further due diligence. The shortlisted bidders were issued Request for Proposal (RFP) on 03.12.2021 with closing date as 23.12.2021. Subsequently, evaluation of Technical bids was carried out with due diligence and thereafter, the financial bids were opened on 26.01.2022 after declaration of technically qualified bidders by DIPAM as per due diligence carried out by SBI Caps, Transaction Advisor (TA) and Luthra & Luthra, Legal Advisor (LA). M/s. Tata Steel Long Products Limited (TSLP) emerged as Highest Bidder (H-I) at Bid Enterprise Value (EV) of Rs.12,100 Crore as declared by DIPAM through its Press Release published on 30.01.2022. M/s. TSLP executed LoA acceptance letter covering payment security of Rs.1210 Crore being 10% of the purchase consideration in the form of Bank Guarantee (BG) alongwith the countersigned Letter of Acceptance (LoA) issued by DIPAM to M/s. TSLP.

Share Sale Purchase Agreement (SPA) and Escrow Agreement were executed on 10.03.2022 by and between NINL, Selling Shareholders, M/s. Tata Steel Long Products Limited (TSLP), Tata Steel Limited (TSL), Govt. of India (Represented by MoC) and Govt. of Odisha. TSLP deposited an amount of Rs.1210 crore (10% of bid value) in Escrow Account No.1 (NINL) and the balance amount (90%) was deposited by TSLP into Escrow Account on 01.07.2022. As per SPA, the completion date was scheduled for 24.04.2022.

As per the provisions of SPA & subsequent mutually agreed Long Stop Date, the divestment process of NINL got completed on 04.07.2022 by carrying out all the due diligence process involving all the stake holders, statutory auditor of NINL. In this process, MMTC recovered an amount of Rs.1872.35 Crore (net of withholding tax) through distribution of sale consideration to promoters in the form of equity on 4th July 2022. Total divestment proceeds received by MMTC is Rs.5335 crores as against in equity investment of 49.78% in NINL.



Other Projects/ Joint Ventures

To take advantage of new opportunities emerging in the free market environment, your company had promoted a number of joint ventures following the public-private partnership model in earlier years. A brief on the current status of such JVs set up in past years is given hereunder:

- (i) Your company presently holds 6% equity capital in Indian Commodity Exchange Limited (ICEX) as on 31.3.2022. As per regulation, 17 of SECC Regulations, 2018 in terms of SEBI Circular Reference no. CIR/CDMRD/DEA/03/2015 dated 26 November 2015 holding has to be reduced to 5% or less. MMTC in 2018 and 2019 appointed consultants for valuation and disinvestment of equity in ICEX. However, MMTC did not receive any bids against the RFPs for sale of stake in ICEX; the last such RFP closed on 8.11.2021. ICEX has not yet finalized its annual report for 2021-22. However, in the financial year 2020-21 operating income was Rs. 1.42 crores and ICEX net loss after tax for the year ended on 31 March 2021 was Rs. 25.67 crores. Balance of loss brought forward was Rs. 204.89 crores. SEBI passed order dated 10.05.2022 for withdrawal of recognition to Indian Commodity Exchange Ltd. and published in the official gazette of India on 18.05.2022. However, Securities Appellate Tribunal (SAT), by its order dated 13 June 2022 has Quashed SEBI order derecognizing ICEX. SAT in its order, dated 13.6.2022 has given ICEX one-year time from 13.6.2022 to complete all compliances to SEBI's satisfaction, and all trading activities would remain suspended during this period.
- (ii) Your company had participated in the equity of Currency Futures Exchange under the name and style of "United Stock Exchange of India Ltd which had been merged with "BSE Limited" (BSE) wherein your Company presently holds 116883 (post bonus issue) equity shares of Rs. 2/- each in BSE. During the year BSE earned a PAT of Rs.195.12 crores as against Rs. 97.26 crores earned during 2020-21 and paid in the current financial year a dividend of Rs.15,77,920.50 (Rs. 13.50 on equity share of Rs. 2/- each) for the Financial Year 2021-22.
- (iii) MMTC-PAMP India Pvt. Ltd., a joint venture Company between MMTC Limited and PAMP SA, Switzerland, operates a precious metals processing facility. MPIPL is India's first and only LBMA Good Delivery Refinery accredited for Gold and Silver. The Joint Venture achieved a turnover of Rs.29,263.50 crore and a profit (after tax) of Rs.44.79 crore during the period FY 2021-22. No dividend was paid by the JV Company during the last 3 years.
- (iv) The JV company – M/s SICAL Iron Ore Terminals Limited (SIOTL) could not commence commercial operations due to non availability of iron ore from Bellary-Hospet Sector in Karnataka State and banning of mining / movement of iron ore for exports by state govt. In view of uncertain future of iron ore exports and to utilize the infrastructure created, Kamarajar Port Trust (erstwhile Ennore Port Trust) decided to award the facility through bidding process for modification of the facility to handle common user coal. As coal does not have synergy with MMTC's existing line of business, In Sept'2016, MMTC Board decided to exit from the JV. MMTC invited bids through online tender for sale of its entire 26% equity in the SIOTL JV, however no response was received. Meanwhile, as per "Right of First Refusal" in Shareholders Agreement of SIOTL, SICAL Logistics Ltd; (lead promoter of SIOTL) offered to purchase MMTC's equity at reserve price fixed by MMTC which MMTC Board decided to accept. Share Purchase Agreement was signed with Sical Logistics Ltd on 31.05.2018 for sale of MMTC's equity in SIOTL and in terms of the agreement M/s Sical Logistics Ltd had deposited Rs.0.50 Cr (PY Rs.0.50 Cr) with MMTC towards performance of agreement. Time to time, the validity of the SPA was extended. Last extension was valid till 31.03.2020. On account of financial crisis, M/s Sical Logistics could not pay the sale value against SPA and therefore provision for Rs.33.80 crore was created by MMTC on 31.03.2020 towards diminution in value of investment.

In March 2021, NCLT pronounced an order as against M/s Sical Logistics Limited initiating corporate insolvency resolution process pursuant to the application preferred by MOL Toyofuji Automotive Logistics [India] Private Limited and an Insolvency Resolution Professional (IRP) was been appointed. MMTC lodged its claim for Rs.34.26 crores with CIRP (Corporate Insolvency Resolution Professional) towards unpaid share sale consideration based on the SPA.

Meanwhile, on 21.12.2020, KPL issued a Notice of Intent to Terminate to SIOTL alleging a financial default under the License Agreement dated 11.07.2016. On 22.03.2021, KPL issued a 90 days' Termination Notice to SIOTL with effect from 22.03.2021. On the same date, KPL has also issued a Transfer Information Notice calling for information from JV Co within 30 days, i.e. by 20.04.2021. As suggested by advocates, MMTC filed a writ petition on 24/06.2021 in Madras High Court for settlement of dispute through Administrative Mechanism of Resolution of Dispute (AMRD).

However, Hon'ble MHC while referring to (Administrative Mechanism for Resolution of Commercial Disputes) AMRCD has opined that "such being position of law, this court of the view that remedy available to petitioner is elsewhere and not this court". The Hon'ble Court vide its order dated 30.11.2021 held that the "writ petition filed by MMTC itself is not maintainable". MMTC has challenged the order vide WA 498 of 2022 & was listed on 28.3.2022/7.4.2022 and is still pending for admission.

The Resolution Professional (RP) in CIRP of SICAL also challenged the impugned termination notice dated 22.03.2021 passed by KPL before NCLT. MMTC moved an application to be impleaded in the said application of the RP. The application of RP was dismissed by NCLT for want of jurisdiction vide Order dated 11.03.2022. As a result, MMTC application was also dismissed.

MMTC has taken opinion of ASG whether MMTC can proceed under AMRCD against KPL and options available to recover its investment. MMTC will be proceeding as per the opinion of ASG. Application is being prepared for settlement of dispute with KPL in AMRCD.

- (v) The name of M/s. T M Mining Company Limited has been struck off from the register of companies and the said company dissolved w.e.f. 28.10.2021.
- (vi) To promote the concept of Free Trade Warehousing Zones in India as declared in the EXIM Policy, MMTC and IL&FS established SPV IN 2004-05 in the name of Free Trade Warehousing Pvt Ltd. The equity is held on 50:50 basis between MMTC and IL&FS. Two 100% owned subsidiaries of FTWPL were established to administer the land banks at Kandla and Haldia. In view of financial situation of the promoters and the need for infusion of the substantial funds for development of the Project, it was decided by the promoters to exit from the project. Accordingly, the land at Kandla has been surrendered to the Project Authority. KASEZ has raised a claim of Rs.5.57 crores approx. in the JV towards pending lease rentals and user charges. With regard to Haldia Land, local farmers had filed petition against Haldia Development Authority challenging the land acquisition in 2015 and stay was granted by Hon'ble High Court of Calcutta. Due to prolonged litigation and stay not being lifted, promoters decided to surrender the land to Haldia Development Authority(HDA). Accordingly in March, 2020, land was surrendered to HDA and refund of lease premium as per agreement is being followed up by JV. Refund of proportionate upfront lease rent of Rs.33.48 crores (approx.) is being followed continuously by the SPV (Haldia Free Trade Warehousing Pvt Ltd) out of which MMTC's share would be Rs. 16.74 cr.
- (vii) A 15 MW capacity Wind Mill project with 25 Wind Energy Generators was commissioned by MMTC in March, 2007 at Gajendragad in Karnataka. The power generated by the project is sold to HESCOM. The project is running successfully and has contributed to the development of area by meeting some of the power needs of Karnataka State. The turnover of the Wind Mill project during 2021-22 was Rs. 5.42 crores by sale of wind power generated by the wind farm at Gajendragad in Karnataka.

INDUSTRIAL RELATIONS & HUMAN RESOURCE MANAGEMENT

Cordial and harmonious industrial relations were maintained in your company during the year. No man days were lost due to any industrial unrest during the year. Further, meetings with representatives of Federation of Officers Associations/ Staff Unions/ SC&ST Associations, were held with a view to maintain cordial and harmonious industrial relations.

The aggregate manpower of your company as on 31st March, 2022 stood at 597, comprising of 3 Board level Executives, 1 CVO, 277 officers and 320 staff/ worker. The manpower also includes 1 officer and 50 staff/ worker of erstwhile Mica Trading Company Ltd., which had been merged with your company pursuant to the orders of BIFR.

The composite representation of the total manpower is - women employees representing 20.10% (120 employees) of the total manpower; SC, ST, OBC & Persons with Benchmark Disabilities (PwBD) to the extent of 21.61% (129 employees), 11% (66 employees), 12.06% (72 employees) and 2.34% (14 employees) respectively.

No recruitment was made during the year.

IMPLEMENTATION OF RESERVATION POLICY

Your company has been complying with the Presidential Directives and other instructions/guidelines issued from time to time by the Government of India regarding the reservation in services for Scheduled Castes (SCs), Scheduled Tribes (STs), Other Backward Classes (OBCs), Economically Weaker Sections (EWS), Persons with Benchmark Disabilities (PWBDs) and Ex-servicemen. A statement showing representation of employees belonging to SC/ST/OBC is as below:

Representation of SCs/STs/OBCs/Divyang as on 31.03.2022									
Group	Total No.	SCs of Employees	%age SCs	STs	%age Sts	OBCs	%age OBCs	Divyang	%age Divyang
A	277	55	19.86	21	7.58	33	11.91	12	4.33
B	182	39	21.43	31	17.03	4	2.20	2	1.10
C	64	14	21.88	4	6.25	24	37.50	0	-
D	74	21	28.38	9	12.16	12	16.22	0	-
Total	597	129	21.61	65	10.89	73	12.23	14	2.34



Recruitment of SCs/STs/OBCs/Divyang during the year 2021-22									
Group	Total Recruitment	SCs	%age SCs	STs	%age STs	OBCs	%age OBCs	Divyang	%age Divyang
A	No recruitment made.								
B	No recruitment made.								
C	No recruitment made.								
D	No recruitment made.								
Total	-	-	-	-	-	-	-	-	-

Promotion of SCs/STs during the year 2021-22					
Group	Total Promotions	SCs	%age SCs	STs	%age STs
A	-	-	-	-	-
B	-	-	-	-	-
C	-	-	-	-	-
D	-	-	-	-	-
Total	-	-	-	-	-

TRAINING AND DEVELOPMENT

For further enhancing / upgrading the skills of employees in the constantly changing business scenario, 205 employees were imparted training during the year in different spheres of company's activities. Due to pandemic situation in the country and restrictions imposed by the Government to contain it, mostly online training programmes (webinars) were organized. The training interventions held covered both functional & behavioural trainings. The employees deputed for webinars included 33 employees belonging to SC, 12 to ST and 89 women employees.

IMPLEMENTATION OF OFFICIAL LANGUAGE

Your company is fully committed to implement the Official Language Policy of the Government of India. All efforts were made by the company to achieve the targets prescribed in the Annual Programme for the year 2021-22 issued by the Department of Official Language (Ministry of Home Affairs, Govt. of India). In order to promote the usage of Hindi in Company's day to day work, several programmes viz. Hindi Workshops, Hindi Day/Week/Fortnight were organized at Corporate Office and Regional Offices during the year. This had brought positive results in use of Hindi in day to day official work.

During the year, Dy. Director from Department of Official Language had inspected the Corporate Office for reviewing the progress of implementation of Hindi. He found the implementation of Official Language and the work being done in Hindi in the office as satisfactory. The Hindi website of MMTC has been updated as per English website regularly. During the year, e-version of quarterly Hindi magazine 'Manikanchan' was published by MMTC keeping in view the Covid SOP issued by the Govt.

VIGILANCE

Vigilance Division of MMTC has been laying its emphasis on efficient response system -as per procedure laid down in CVC's Compliant Handling System while dealing with various CVC referred Complaints/direct complaints. Simultaneously, the scope for Systemic Improvements, if any, while investigating the complaints, is also being taken up as focussed area to strengthen internal controls in Vigilance Division.

During the year Vigilance Division processed 22 complaints (CVC-2, other-20), out of which 20 complaints have been disposed off and action on remaining 2 complaints was in progress as on 31.03.2021. Further during the year Vigilance Division dealt with three Departmental Inquiry Proceedings (2 CVC and 1 Non-CVC) progressing at various stages. In one case of 2016, total 5 officials involved as per CVC's – SSA, exoneration orders issued by DA for 2 officials. Proceedings in respect of other 3 officials are in progress. In another case involving CVC's 1st stage advice, departmental proceeding in respect of 03 officials is under progress. In a non-CVC case involving 09 officials, departmental proceedings have been completed and final order have been issued.

During the year, 50 inspections were conducted by Vigilance Officers (VOs) and 32 by Non-Vigilance Officers (NVOs) of Regional Offices and the inspection reports submitted were processed at Vigilance Division and appropriate action was taken, wherever required. Vigilance Division has conducted 2 CTE type inspections inhouse and also responded with replies to observations of TE, CVC in 2 pending CTE type observations of tenders floated by various divisions of MMTC. Audit Reports of Internal Auditors have also been examined and shortcoming observed were communicated for corrective action. Apart from inspections, Vigilance Division has also scrutinized 145 Annual Property Returns of the employees.

Compliances with respect to ODI, Agreed List(s), MIS updation on DOPT Solve, QPR, CTE-Type QPR, Structured Meetings have been responded to in line with extant guidelines.

Vigilance Division has also conducted various activities during Vigilance Awareness Week 2021, across all its offices from 26.10.2021-01.11.2021 as per instructions of CVC on the theme 'Independent India @75: Self Reliance with Integrity'. During the week, various activities including Preventive Vigilance Practices, online Integrity Pledge Administration and inhouse (housekeeping) activities were undertaken and compliance report as per Reporting Format was furnished to CVC.

VIGIL MECHANISM

In accordance with the provisions of Section 177 of Companies Act 2013, the Board of your company introduced a Scheme on 'Vigil Mechanism' in 2014. The vigil mechanism is established for Directors and employees to report their genuine concerns. The concerns, if any, from any employee/Director shall be addressed to the Chairman of the Audit Committee. During the year under review, no such complaint has been received. This mechanism is apart from the Whistle Blower Policy, already in force.

INTEGRITY PACT

Integrity Pact is promoted as part of series of steps taken by Central Vigilance Commission for ensuring transparency, equity and competitiveness in public procurement. Your Company has also implemented the same to promote transparency/equity amongst the bidders and to plug any possibility of corrupt practices in trade conducted by the Company. Shri Bal Raj, ITS (Retd.), has been appointed to function as Independent External Monitor(IEM)

CORPORATE SOCIAL RESPONSIBILITY AND SUSTAINABLE DEVELOPMENT

Your company's CSR Policy is in line with Section 135 of the Companies Act '2013 and the CSR Rules as notified by the Ministry of Corporate Affairs and the CSR projects have been undertaken in terms of Section 135 of the Companies Act. The CSR Policy is hosted on the Company's website in bilingual form.

Your company incurred losses during FY 2019-20 and FY 2020-21. Accordingly, the CSR budget calculated in accordance with the Section 198 of the Companies Act, 2013 i.e. 2% of average net profit of preceding 3 years was negative. Therefore, there was no annual CSR budget approved by Board of Directors for the year 2021-22. As such, no fresh CSR project was undertaken during FY 2021-22. However, your company only executed ongoing CSR projects of FY 2019-20 which were carried forward to FY 2021-22.

In terms of Section-21(b) of the Companies (Amendment) Act 2019, a Special CSR Bank Account was opened for the unspent CSR funds and an unspent amount as on 31.03.2021 amounting Rs. 10.01 lakhs was transferred to the account. The utilization of funds from this account during FY 2021-22 is as below:

Opening Balance (as on 01.04.2021)	Rs. 10.01 lakhs
Expenditure during FY 2021-22:	
(i) Payment of final installment to Shri Deep Chand Educational Society towards Skill Development Program (CSR Project of FY 2019-20).	Rs. 1.50 lakhs
(ii) Payment of final installment to CKS Foundation towards Education of slum children (CSR Project of FY 2019-20).	Rs. 3.24 laks
Closing Balance (as on 31.03.2022)	Rs. 5.27 lakhs

CORPORATE GOVERNANCE

Corporate Governance has emerged as an important tool to the business community to become efficient, competitive and successful enterprise. Your Company reposes its firm faith in continuous development, adoption and dedication towards the best corporate governance practices. Towards this end, the norms prescribed under the Companies Act, 2013, SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 and Guidelines as applicable for CPSEs issued by the Department of Public Enterprises in this regard are being implemented regularly. However, appointment of vacant positions of Independent Directors as required as on 31.3.2022 is yet to be made by the Government.

A separate Report on Corporate Governance along with certificate from M/s VAP & Associates (CP No.13901) regarding compliance of the stipulations relating to corporate governance specified in Listing Regulations is annexed hereto and forms part of this report. It may be mentioned that the company has complied with the CG norms prescribed by the Department of Public Enterprises applicable for CPSEs and the quarterly reports on compliance of Guidelines of Corporate Governance for CPSEs are sent regularly.

CODE OF CONDUCT

Pursuant to Regulation 15(5) of Listing Regulations, the Code of Conduct applicable to the Board members & senior management personnel has been posted on the website of your company. All Board Members and Senior Management Personnel as on 31st March, 2022 to whom the said Code is applicable have affirmed compliance of the same for the period ended 31st March, 2022. Based on the affirmation received from Board Members and Senior



Management Personnel, declaration regarding compliance of Code of Conduct made by the Chairman & Managing Director is given below:

Declaration as required under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and DPE's Guidelines on Corporate Governance

"All the members of the Board and Senior Management Personnel have affirmed compliance of the 'Code of Business Conduct & Ethics for Board Members and Senior Management Personnel' of the company for the financial year ended on March 31, 2022."

sd/- (on 9.6.2022)

VIBHU NAYAR

Ex-CMD

DIN: 03590141

BUSINESS RESPONSIBILITY REPORT

In accordance with the provisions of regulation 34(2) of SEBI(Listing Obligations and Disclosure Requirements) Regulations, 2015, your Company has prepared the Business Responsibility Report for inclusion in the Annual Report for the year 2021-22. The framework and principles suggested by SEBI is to assess compliance with environment, social and governance norms pertaining to Sustainable Development Goals. The said Business Responsibility Report is annexed herewith and forms part of the Annual Report.

PUBLIC PROCUREMENT POLICY FOR MICRO & SMALL ENTERPRISES

Under Public Procurement Policy (PPP) issued by the Ministry of Micro, Small and Medium Enterprises, Government of India for Micro & Small Enterprises (MSEs), a minimum of 25% share out of the total procurement of goods and services by Central Ministries/Departments/PSUs are to be made from MSEs. Further out of the 25% target of annual procurement from MSEs, a sub-target of 5% annual procurement from MSEs owned by SC/ST Entrepreneurs and an additional 3% reservation for the Women owned MSEs within the above 25% reservation is applicable vide Gazette Notification dated 09.11.2018. Preference will be given to firms registered with the M/o MSME as per guidelines prescribed under MSMEs Act, 2006.

Pursuant to Public Procurement Policy, during the year 2021-22, total annual procurement by MMTCL in respect of administrative requirements was Rs.7.77 Cr., out of which goods and services worth Rs.6.37 Cr. (i.e. 82%) were procured from MSEs including MSEs owned by SC/ST Entrepreneurs, Rs.0.81 Cr. (i.e. 12.83%) from MSEs owned by SC/ST entrepreneurs and 1.4 Cr. (22.09%) from MSEs owned by Women Entrepreneurs.

PUBLIC DEPOSIT SCHEME

As on 1st April 2021, there were no outstanding public deposits and the company did not invite/ accept any public deposit during the year ended 31st March, 2022.

ANNUAL RETURN

Pursuant to Section 92(3) of Companies Act, 2013 a copy of the Annual Return filed during 2021-22 is available on the website of the company: www.mmtclimited.com.

STATUTORY AUDITORS' REPORT

The report of Statutory Auditors for the year 2021-22 along with Management's reply to the observations of the Statutory Auditors is annexed herewith.

COMMENTS OF COMPTROLLER & AUDITOR GENERAL OF INDIA

The Comptroller & Auditor General of India (C&AG) has given 'NIL' comments under section 143 (6) (b) of the Companies Act, 2013 on the Standalone and Consolidated Accounts of the Company for the year ended 31.03.2022 vide Communication dated 13th September, 2022.

SECRETARIAL AUDIT

Pursuant to provisions of Section 204 of the Companies Act, 2013 read with Rule 9 of the Companies (Appointment and Remuneration of Managerial Personnel) Rules 2014, your Company engaged the services of M/s. VAP & Associates, Company Secretaries, New Delhi to conduct the Secretarial Audit of the Company for the financial year ended March 31, 2022. The Secretarial Audit Report (in Form MR-3) along with Management's Reply on the observations of the Secretarial Auditor is annexed herewith.

PARTICULARS OF LOANS, GUARANTEES OR INVESTMENTS UNDER SECTION 186 OF THE COMPANIES ACT, 2013

Details of investments, loans and guarantees covered under the provisions of Section 186 of the Companies Act, 2013 are given in Notes forming part of the financial statements. The company's exposure to JV Company M/s. Neelachal Ispat Nigam Ltd as on 31.3.2022 is Rs.3463.11 crores, including working capital credit facilities.

RELATED PARTY TRANSACTIONS

All transactions entered by the Company with Related Parties were in the Ordinary Course of Business. The Audit Committee granted omnibus approval for the transactions undertaken during 2021-22. Suitable disclosures as required under Ind AS-24 have been made in Note 42 of Notes to the financial statements. Details of the transaction are provided in Form AOC-2 which is annexed herewith.

The Policy on Related Party Transactions as approved by the Board of Directors has been uploaded on the Company's website at the following link: <http://mmtclimited.com/files/related%20party%20transaction%20policy%20eng.pdf>

RISK MANAGEMENT POLICY

The Board of Directors approved the Risk Management Policy after the same has been duly recommended by the Audit Committee of Directors to take care of various risks associated with the business undertaken by your company. The details of various Risks associated with the trade conducted by the company and its risk management as practiced by the Company are provided as part of Management Discussions and Analysis Report which is annexed herewith. Further, the company has implemented Fraud Prevention Policy in order to enforce controls and to aid in prevention and detection of frauds in the Company. The Policy intends to promote consistent legal and ethical organizational behaviour by assigning responsibility for the development of controls, and providing guidelines for reporting and conduct of investigations of suspected fraudulent behaviour.

The Company does not take exposure in volatile commodities/ market condition. Generally, it makes purchases only against confirmed orders backed by appropriate margin money. Guidelines are in place requiring forward foreign exchange cover to be taken in respect of transactions involving MMTC funds.

CONSERVATION OF ENERGY

During the year 2021-22, there was no activity in MICA group of your company as the plant is inoperative. Therefore, pursuant to rule 8(3) of the companies (Accounts) Rules, 2014, the company does not have anything to report under this head.

PARTICULARS OF EMPLOYEES

As per provisions of Section 197(12) of the Companies Act, 2013 read with Rule 5 of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, every listed company is required to disclose the ratio of the remuneration of each director to the median employee's remuneration and details of employees receiving remuneration exceeding limits as prescribed from time to time in the Directors' Report. However, as per notification dated 5th June, 2015 issued by the Ministry of Corporate Affairs, Government Companies are exempted from complying with provisions of Section 197 of the Companies Act, 2013. Therefore, such particulars have not been included as part of Directors' Report.

DIRECTORS' RESPONSIBILITY STATEMENT

Pursuant to the provisions of Section 134(5) of the Companies Act, 2013, your Directors state that:

- a) in the preparation of the annual accounts, the applicable accounting standards had been followed along with proper explanation relating to material departures;
- b) the Directors had selected such accounting policies and applied them consistently and made judgments and estimates that are reasonable and prudent so as to give a true and fair view of the state of affairs of the Company at the end of the financial year and of the profit and loss of the Company for the year ended 31.3.2022;
- c) the Directors have taken a proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of this Act for safeguarding the assets of the Company and for preventing and detecting fraud and other irregularities;
- d) the Directors had prepared the annual accounts on a going concern basis.
- e) the Directors of your company had laid down internal financial controls to be followed by the company and that such internal financial controls are adequate and were operating effectively; and
- f) the Directors had devised proper systems to ensure compliance with the provisions of all applicable laws and that such systems were adequate and operating effectively.
- g) At present, MMTC is not carrying out any business activity
- h) Auditors/CAG comments on annual accounts of MMTC for the year 2021-22 form part of the annual accounts and are available in this report.

DISCLOSURE UNDER THE SEXUAL HARASSMENT OF WOMEN AT THE WORKPLACE (PREVENTIVE, PROHIBITION & REDRESSAL) ACT, 2013

Your company has put in place a policy in line with the requirements of the Sexual Harassment of Women at the Workplace (Prevention, Prohibition & Redressal) Act, 2013. Internal Complaints Committee (ICC) has been set up at Corporate Office & Regional Offices to redress complaints received regarding sexual harassment at workplace. All employees (permanent, contractual, temporary, trainees) are covered under this policy.



No complaint was received by the company under the above Act during the year.

INFORMATION UNDER RIGHT TO INFORMATION (RTI) ACT

Your company as a Public Authority has responded to various compliances under RTI Act, 2005. Details of designated First Appellate Authority (FAA), Transparency Officer, Chief Public Information Officer (CPIO)/ Nodal CPIO, Public Information officer (PIO's) etc. have been displayed on public domain. During the year, a total of 26 RTI applications were received directly / under Sec.6(3) of the RTI Act and all the RTIs have been disposed off. Further, a total of 4 First Appeals were received by FAA during the year, which were also disposed off. Your company has also undertaken 'Self-Assessment Audit' of the Voluntary Disclosures to be made on public domain (www.mmtclimited.com) in terms of provisions laid down in Section-4 of the RTI Act 2005 and same is submitted for third party audit and final evaluation by CIC.

DISPUTE BETWEEN MMTCL & ANGLO AMERICAN COAL

The Execution Petition No. 19/2018 filed by Anglo Coal against MMTCL post Hon'ble Supreme Court award in favour of Anglo Coal in respect of non performance of coking coal contract is pending in Delhi High Court. MMTCL deposited Rs.1087 crores approx. on 20.7.2022 to secure the interest of the decree holder. Next date of hearing posted to 29.11.2022 for the interim application and 14.12.2022 for the execution petition.

BOARD OF DIRECTORS

Following are the changes in the Board of Directors of your company since 1st April 2021:-

Name of the Director	Category	Date of Appointment/ Cessation	Cessation Appointment/
Dr. Pradip Kumar Varma	Non official Independent Director	13.11.2021	Appointment
Shri Shyamal Misra	Govt. Nominee Director	07.12.2021	Cessation
Shri Manjunath G	Non official Independent Director	16.12.2021	Cessation
Shri Vipul Bansal	Govt. Nominee Director	20.12.2021	Appointment
Shri Sanjay Chadha	CMD (Addl. Charge)	28.02.2021	Cessation
Shri Vibhu Nayar	CMD (Addl. Charge)	01.03.2022 31.08.2022	Appointment Cessation
Shri Hardeep Singh	CMD (Addl. Charge)	27.10.2022	Appointment

The Board places on record its deep appreciation for the commendable services and the contributions made by the Directors who ceased to be on the Board w.e.f. 1.4.2021 onwards. The Board welcomes Shri Hardeep Singh, CMD (Addl. Charge) who joined the Company after the last AGM held on 23.4.2022 and expresses its confidence that the Company shall immensely benefit from his rich and varied experience.

In terms of provisions of Article 87(4)(A) of Articles of Association of the Company regarding rotational retirement of Directors, Shri Kapil Kumar Gupta, Director (Finance) shall retire at the AGM and, being eligible, has offered himself for re-appointment.

ACKNOWLEDGEMENT

Your Directors would like to acknowledge and place on record their sincere appreciation of all stakeholders- Shareholders, Department of Commerce, all Govt. Agencies, RBI and other Banks, Railways, Customs, Ports, Customers, Suppliers and other business partners for the excellent support and cooperation received from them during the year. Your Directors also recognize and appreciate the efforts and hard work of all the employees of the Company and their continued contribution towards its progress.

By the Order of the Board

Sd/-

(Hardeep Singh)

Chairman and Managing Director

Dated: 9.11.2022

MANAGEMENT DISCUSSION AND ANALYSIS REPORT 2021-22

Overview of Global Trade & Developments

The global economy is facing unprecedented volatility and disruption due to Covid-19 and global uncertainties.

A tentative recovery in 2021 has been followed by increasingly gloomy developments in 2022 as risks began to materialize. Several shocks have hit a world economy already weakened by the pandemic higher-than-expected and also further negative spillovers from the war in Ukraine.

With increasing prices continuing to squeeze living standards worldwide, taming inflation should be the first priority for policymakers. Tighter monetary policy will inevitably have real economic costs, but delay will only exacerbate them. Targeted fiscal support can help cushion the impact on the most vulnerable, but with government budgets stretched by the pandemic and the need for a disinflationary overall macroeconomic policy stand such policies will need to be offset by increased taxes or lower government spending. Tighter monetary conditions will also affect financial stability, requiring judicious use of macro prudential tools and making reforms to debt resolution frameworks all the more necessary. Policies to address specific impacts on energy and food prices should focus on those most affected without distorting prices. Finally, mitigating climate change continues to require urgent multilateral action to limit emissions and raise investments to hasten the green transition.

Overview of Economic Developments in India during 2021-22

Despite supply chain disruptions, inflation, etc. the Indian economy is still consolidating and emerging. The Indian economy grew 8.7 per cent in 2021-22, with the gross domestic product (GDP) expanding at 4.1 per cent in the March quarter from a year ago. The GDP growth for 2021-22 takes the economy above its pre-pandemic level and is an improvement after contracting 6.6 per cent in 2020-21.

Outlook for 2022-23

In 2023, Indian economy is projected to grow 7.1-7.6 per cent in the current financial year despite shifting geopolitical realities across the world. India's economic outlook as per one of the market reports, says that as 2021 was coming to a close, there was an optimism in the air but the optimism received a jolt early this year as a wave of Omicron infections swept through the country and Russia's invasion of Ukraine happened in February 2022. Reserve Bank of India (RBI) has projected a GDP growth of 7.2 per cent for the current fiscal ending March 2023.

The IMF had cut India's gross domestic product (GDP) growth projection for 2022 to 8.2 per cent from 9 per cent in its World Economic Outlook report in April 22. The growth projection for 2023 is 6.9 per cent.

MMTC- 2021-22 in retrospect

Financial Review

In the backdrop of stoppage of entire business activities on the instructions of the administrative ministry following the new Enterprise Policy for CPSEs in the Non Strategic Sector, your company achieved a trade turnover of Rs.7840.78 crores during 2021-22 as against the turnover of Rs. 26,364.50 crores registered during last fiscal. This turnover includes Exports of Rs. 34.40 crores, Imports of Rs. 7070.58 crores and domestic trade of Rs. 735.80 crores. Your Company suffered a Net Loss of Rs.241.93 crores in the current financial year as against Loss of Rs.769.69 crore during last year.

Source and Utilization of Funds

The source of funds of the company as on 31st March, 2022 comprises of shareholders fund amounting to Rs.193.40 crores including equity share capital of Rs.150 crores and non-current and current liabilities of Rs.40.86 crores and Rs.4528.70 crores respectively. These funds have been deployed, inter alia, towards non-current assets amounting to Rs. 355.20 crores and current assets of Rs.4407.76 crores as on 31st March, 2022.

Internal Control Procedures

MMTC has Internal Audit System & Procedures which are in line its business operations. The scope of audit is reviewed by the Audit Committee. The directions, if any, of Audit Committee are duly complied. The company has an Internal Audit Division, to coordinate with external auditing firms in conducting internal audit. The Audit Committee comprises of Dr. Pradip Kumar Varma, Independent Director as Chairman, Shri Shashank Priya, Govt. Nominee Director and Dr.(Mrs.) Swadhinta Krishna, Independent Directors as Members.

Subsidiary Company

MMTC Transnational Pte. Ltd. (MTPL), Singapore, the wholly owned subsidiary of your Company has been engaged in commodity trading and has established itself as a credible and reputable trading outfit in Singapore. During the financial year 2021-22 MTPL achieved sales turnover of USD 456.58 million as against USD 486.20 million recorded during last fiscal. The Net Profit of MTPL during the financial year 2021-22 amounted to USD 0.69 million as against USD 1.12 million earned during 2020-21. The net worth of MTPL stood at USD 6.17 million as on 31st March 2022. Overall dividend declared by MTPL since inception is USD 26.94 million which includes a dividend of USD 5.00 million received from MTPL during FY 2021-22.

Pursuant to the provisions of Section 129 of the Companies Act, 2013, the audited financial statements of MTPL together with Directors' Report & Auditor's Report are attached herewith.



Business Group wise Review for 2021-22

Minerals

The Minerals group of your Company has played a leading role in iron ore trade for a period spanning over five decades. In the last decade, MMTC could withstand the stiff competition in the global market by consolidating the mineral portfolio, dynamic and prudent strategies to insulate against the market vagaries, expanding extensively its infrastructure facilities and by attaching utmost care and importance to its trade commitments as also the quality of service and products.

During 2021-22 the Minerals Group of your Company achieved a turnover of Rs.25.51 crores from exports of Minerals. The main constituents of this group are:

(i) Iron Ore

As per current EXIM Policy of Government of India, MMTC Limited was the designated State Trading Enterprise for export of Iron Ore for grade Fe 64% and above. MMTC exported Iron ore to Japan and South Korea under Long Term Agreements (LTAs), duly approved by the Govt. of India. The last LTA was for the period 2018-21. However, the Long Term Agreements with Japanese Steel Mills and POSCO, South Korea for export of iron ore have not been renewed by the Govt. of India resulting in MMTC discontinuing the iron ore business under LTA after 31.3.2021.

(ii) Manganese Ore

As per EXIM Policy, export of Manganese Ore is canalized through MMTC. During the year, the Company achieved a turnover of Rs.25.51 crores from export of Manganese Ore.

Precious Metals, Gems & Jewellery

Your Company has been one of the established players in bullion trade and importing precious metal since 1988. It has been one of the nominated agencies for more than three decades and has been supplying precious metals to Exporters/Domestic end users on pan India basis including SEZs. MMTC has tied up with many of London Bullion Market Association (LBMA) approved foreign suppliers to cater domestic market and exporters for in time scheduled supply of precious metals at competitive premium.

The record high prices was the driving factor behind weakness in consumer demand in precious metals throughout 2021, despite that Precious Metals Group of MMTC contributed a gross turnover of Rs.6,013.01 crores and a profit of Rs.27.73 crore for FY 2021-22, contributing to almost 72% of the total turnover achieved by the company.

Non-Ferrous Metals & Industrial Raw Materials

During 2021-22 the NFM Division has achieved Sales Turnover of Rs. 14.5 crores through import of Zinc (spillover shipments from contracts signed in previous FY 2020-21) and domestic trade of Tin. No fresh import contracts were signed by NFM Division in FY 2021-22. MMTC's supplier base comprised of reputable international suppliers of all base and minor metals and has linkages with major PSUs, Railways and Ordnance Factories to ensure steady stream of business.

Agro Products

The Agro group of your Company achieved a revenue of Rs. 75.60 crores during FY 2021-22 in domestic trade of pulses, edible oil and achieved profit of Rs 2.74 crs.

DGFT nominated MMTC as the sole STE for import of Copra and one of the STEs for import of coconut oil wherein MMTC is permitted to issue NOC's to the associates having DGFT's license. MMTC is issuing NoCs for import of coconut oil and copra to the various parties approaching MMTC with valid DGFT's license. In F.Y. 2021-22, MMTC had issued NOC's for import of Copra to various associates and had booked a margin of about Rs. 1.84 crores included in above profit of Rs 2.74 Crs.

Fertilizers and Chemicals

MMTC imports urea on behalf of Department of Fertilizers, Ministry of Chemicals and Fertilizers, Govt. of India based on MOU signed between MMTC & DOF. MMTC also imports Sulphur for SAIL RSP under MOU signed between SAIL & MMTC.

During FY 2021-22, the Fertilizer division has contributed a turnover of Rs.1457.00 crores on account of import of 5.46 Lakhs tonnes of urea on behalf of DOF. DGFT, vide notification dated 3rd November 2021 delisted MMTC as canalizing agency for import of Urea on Government account. MMTC could float only one tender prior to delisting during FY 2021-22.

Projects and General Trade

The General Trade Group of your company achieved a turnover of Rs.37.39 crores (including export of silver alloys fo Rs. 23.14 crores) during the year under review. The group organised export of Red Sanders based on the allocation received from Directorate of Revenue Intelligence, valuing Rs.8.89 crores during the year 2021-22. Sale of Wind Power generated from the Wind Farm at Gajendragad in Karnataka earned a turnover of Rs.5.36 crores. Further The power generated from the project is sold to HESCOM. The project is running successfully and has contributed to the development of the area by meeting some portion of energy needs of Karnataka State.

Future prospects of the Company

Historically, the Company has been engaged in canalized business activities in the segments of Minerals & Metals, Fertilizers, Precious Metals and Agri products which were the mainstay to generate turnover and trading income. In addition, the Company has forayed into backward/forward integration through stakes in joint ventures most of which have been non – performing. However, due to Government's new Public Sector Policy as per which there will be a bare minimum presence of PSEs limited to strategic sectors only. Since MMTC falls in the non-strategic sector, MMTC has been directed to prepare a road map for scaling down of operations including exit from various JVs in a phased manner. Also directions have been given for downsizing of business operations, implementation of VRS etc. Government also decided that the LTA for export of Iron Ore to Japan and South Korea shall not be extended after 31st March 2021 and in November 2021, MMTC was delisted as an STE for import of urea on account of Deptt. of Fertilizers. MMTC was directed to exit from bullion operations and other canalized/nominated business. Department of Commerce is of the view that there is no requirement of MMTC as a central canalizing agency and that relevant Ministry/Departments can do trading through their own PSUs/other agencies. However, formal decision of Government regarding closure of the Company is awaited.

Cautionary Statement

Statements in the Management Discussions and Analysis describing the Company's projections, estimates, and expectations may be "forward looking statements" within the meaning of applicable laws and regulations. Actual results could differ materially from those expressed or implied. Important factors that could make a difference to the Company's operations include economic conditions affecting demand/supply and price conditions in the domestic and overseas markets in which the Company operates, changes in Government regulations/policies, tax laws, other statutes and other incidental factors. MMTC is not carrying any business at present.



THE ANNUAL REPORT ON CSR ACTIVITIES – 2021-22

1. Brief outline on CSR Policy of the Company.

Your Company has consistently played the role of a good corporate citizen and has shown its deep commitment towards Corporate Social Responsibility practices by conducting its business in an ethically, socially and environmentally sustainable manner. Even in the absence of an official mandate regarding CSR activities, your Company adopted CSR as a policy initiative long ago in Sept. 2006, effective from 2007-08, and allocated 1% of retainable profit of previous year for undertaking CSR activities. Special emphasis were given on education, health care, promotion of art & culture and undertaking community related activities, besides providing relief in times of natural calamities.

The Company's present CSR policy is in line with Section 135 of the Companies Act and the CSR Rules as notified by the Ministry of Corporate Affairs and the CSR projects have been undertaken in terms of Section 135 of the Companies Act. The Company's CSR Policy is hosted on its website.

Your company incurred losses during FY 2019-20 and FY 2020-21. Accordingly, the CSR budget calculated in accordance with the Section 198 of the Companies Act, 2013 i.e. 2% of average net profit of preceding 3 years was negative. Therefore, there was no annual CSR budget approved by Board of Directors for the year 2021-22. As such, no fresh CSR project was undertaken during FY 2021-22. However, your company only executed ongoing CSR projects of FY 2019-20 which were carried forward to FY 2021-22.

In terms of Section-21(b) of the Companies (Amendment) Act 2019, a Special CSR Bank Account was opened for the unspent CSR funds and an unspent amount as on 31.03.2021 amounting Rs. 10.01 lakhs was transferred to the account. The utilization of funds from this account during FY 2021-22 is as below:

Opening Balance (as on 01.04.2021)	Rs. 10.01 lakhs
Expenditure during FY 2021-22:	
(i) Payment of final installment to Shri Deep Chand Educational Society towards Skill Development Program (CSR Project of FY 2019-20).	Rs. 1.50 lakhs
(ii) Payment of final installment to CKS Foundation towards Education of slum children (CSR Project of FY 2019-20).	Rs. 3.24 laks
Closing Balance (as on 31.03.2022)	Rs. 5.27 lakhs

2. The Composition of the CSR Committee

Sl. No.	Name of Director	Designation /Nature of Directorship	Number of meetings of CSR Committee held during the year	Number of meetings of CSR Committee attended during the year
1.	Shri Shashank Priya	Government Nominee Director/ Chairperson of the Committee	1	1
2.	Dr. Pradip Kumar Varma	Non-Official Independent Director/ Member of the Committee	1	1
3.	Shri Rajiv Ranjan Sinha	Director (Personnel)/ Member of the Committee	1	1
4.	Shri Kapil Kumar Gupta	Director (Finance)/ Member of the Committee	1	1

3. Provide the web-link where Composition of CSR committee, CSR Policy and CSR projects approved by the board are disclosed on the website of the company.

Web-link: <https://www.mmtclimited.com/pages/display/89-corporate-social-responsibility>

4. Provide the details of Impact assessment of CSR projects carried out in pursuance of sub-rule (3) of rule 8 of the Companies (Corporate Social responsibility Policy) Rules, 2014, if applicable (attach the report).

Not applicable.

5. Details of the amount available for set off in pursuance of sub-rule (3) of rule 7 of the Companies (Corporate Social responsibility Policy) Rules, 2014 and amount required for set off for the financial year, if any

Sl. No.	Financial Year	Amount available for set-off from preceding financial years (in Rs)	Amount required to be setoff for the financial year, if any (in Rs)
1	2021-22	Nil	Nil

Average net profit of the company as per section 135(5). Rs. (416.32) crores

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

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

- (b) Details of CSR amount spent against ongoing projects for the financial year:
Not applicable.
- (c) Details of CSR amount spent against other than ongoing projects for the financial year:
Not applicable.
- (d) Amount spent in Administrative Overheads: Nil
 (e) Amount spent on Impact Assessment, if applicable: NA
 (f) Total amount spent for the Financial Year (8b+8c+8d+8e): Nil
 (g) Excess amount for set off, if any

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

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

Sl. No.	Preceding Financial Year	Amount transferred to Unspent CSR Account under section 135 (6) (in Rs.)	Amount spent in the reporting Financial Year (in Rs.)	Amount transferred to any fund specified under Schedule VII as per section 135(6), if any			Amount remaining to be spent in succeeding financial years. (in Rs.)
				Name of the Fund	Amount (in Rs.)	Date of Transfer	
1.	2019-20	10,01,200	4,74,000	-	-	-	5,27,200



Sl. No.	Project ID	Name of the Project	Financial Year in which the project was commenced	Project duration	Total amount allocated for the project (Rs. in Lakh)	Amount spent on the project in the reporting Financial Year (Rs. in Lakh)	Cumulative amount spent at the end of reporting FY (Rs. in Lakh)	Status of the project - Completed /Ongoing
1.		Undertaking Skill development training for disadvantaged social groups (Women, downtrodden and under privileged children) in the area of (i) Apparel & Dress Making (Cutting & Tailoring) and (ii) Beautician (Beauty & Wellness)	2019-20	1 year 6 months	5.00	1.50	5.00	Completed
2.		Towards educational activities for the under privileged children	2019-20	1 year 6 months	5.32	3.24	5.32	Completed
	Total				10.32	4.74	10.32	

10. In case of creation or acquisition of capital asset, furnish the details relating to the asset so created or acquired through CSR spent in the financial year (asset-wise details). Nil
- (a) Date of creation or acquisition of the capital asset(s). NA
- (b) Amount of CSR spent for creation or acquisition of capital asset. NA
- (c) Details of the entity or public authority or beneficiary under whose name such capital asset is registered, their address etc. NA
- (d) Provide details of the capital asset(s) created or acquired (including complete address and location of the capital asset). NA
11. Specify the reason(s), if the company has failed to spend two per cent of the average net profit as per section 135(5).
Not applicable.

Sd/-

(Director-Personnel)

Sd/-

(Chairman CSR Committee)

CORPORATE GOVERNANCE IN MMTC

Corporate Governance has become an integral part of the organization to accomplish the strategic goals of the company, strengthen confidence, maximize long term value of shareholders and stakeholders' wealth. MMTC is fully committed to promoting and strengthening the principles of sound Corporate Governance norms through the adherence of highest standards of transparency, trust and integrity, performance orientation, professionalism, ethical business practices, responsibility and accountability, social responsiveness and commitment to the organization as a self-disciplined code for sustainable enrichment of value for stakeholders which include investors, directors, employees, suppliers, customers or the community in general.

A Report in line with the requirements of SEBI(Listing Obligations & Disclosure Requirements) Regulations, 2015 and Guidelines on Corporate Governance for Central Public Sector Enterprises issued by Department of Public Enterprises (DPE) is given below as a part of the Directors' Report along with a Certificate issued by a Practicing Company Secretary regarding compliance with the provisions of Corporate Governance.

BOARD OF DIRECTORS

The Board of MMTC Ltd has a mix of Executive & Non- Executive Directors. The present Board as on date of this report includes Chairman & Managing Director (Additional Charge), one Whole Time Director (Marketing), one Whole Time Director (Personnel), one Whole Time Director (Finance), two Part Time Govt. Nominee Directors and two Part Time Non-Official (Independent) Directors. The President of India appoints all the Directors of MMTC Ltd in accordance with the provisions of Articles of Association of the Company. All the Directors, except CMD and Independent Directors, are liable to retire by rotation and at least one third of the directors liable for rotational retirement, retire every year and if eligible, qualify for reappointment.

The members of the Board, apart from receiving Directors' remuneration, in case of Functional Directors and Sitting fees in the case of Non-official(Independent) Directors, do not have any material pecuniary relationship or transaction with the company, its promoters or its subsidiary, which in the judgment of Board may affect independence of judgment of Directors.

The Composition of Board during the year 2021-22 was as under:-

S. No	Name of Director	Executive/ Non-Executive	Designation held	No. of Directorship in other Board as on 31.3.2022	No. of Board Committees of which Member/ Chairman as on 31.3.2022
1	Mr. Vibhu Nayar (w.e.f.1.3.2022)	Executive	Chairman & Managing Director (Addl.Charge)	CMD - 1	NIL
2	Mr Sanjay Chadha (upto 28.2.2022)	Executive	Ex- Chairman & Managing Director (Addl.Charge)	N.A.	N.A.
3	Mr. Shashank Priya	Non- Executive	Govt. Nominee Director	Director – 6	Member – 5 Chairman – 1
4	Shri Shyamal Misra (upto 7.12.2021)	Non-Executive	Govt. Nominee Director	N.A.	N.A.
5	Shri Vipul Bansal (w.e.f.20.12.2021)	Non-Executive	Govt. Nominee Director	Director -3	NIL
6	Shri Manjunath G. (upto 16.12.2021)	Non-Executive	Part Time Non-official (Independent) Director	NIL	N.A.
7	Dr.(Mrs.) Swadhinta Krishna	Non- Executive	Part Time Non-official Director (Independent)	NIL	Member -1\ Chairperson -1
8	Dr PK Varma (w.e.f.13.11.2021)	Non- Executive	Part Time Non-official (Independent) Director	NIL	Chairman – 1
9	Mr. J.Ravi Shanker	Executive	Director(Marketing)	Chairman – 3 Director-2	NIL
10	Mr. R.R. Sinha	Executive	Director (Personnel)	Director-2	NIL
11	Mr. Kapil Kumar Gupta	Executive	Director(Finance)	Director-5	Member – 1



*Only the Audit Committee and Stakeholder Relationship Committee of other Public Companies have been considered.

N.A.->Since these directors ceased to be on the Board of the Company hence their disclosures as on 31.03.2022 are not available.

Changes in Board of Directors (Since 01.04.2021)

Name of Director	Category	Date of Appointment/ Cessation	Appointment/ Cessation
Dr. Pradip Kumar Varma	Non official Independent Director	13.11.2021	Appointment
Shri Shyamal Misra	Govt. Nominee Director	07.12.2021	Cessation
Shri Manjunath G	Non Official Independent Director	16.12.2021	Cessation
Shri Vipul Bansal	Govt. Nominee Director	20.12.2021	Appointment
Shri Sanjay Chadha	CMD(Addl. Charge)	28.02.2022	Cessation
Shri Vibhu Nayar	Ex-CMD(Addl. charge)	01.03.2022	Appointment
		31.08.2022	Cessation
Shri Hardeep Singh	CMD (Addl. Charge)	27.10.2022	Appointment

Remuneration of Directors

MMTC is a Govt. of India Enterprise in which all members of the Board are appointed by the President of India through the administrative Ministry- Department of Commerce, Ministry of Commerce & Industry, Govt. of India, which, Inter-alia fixes the remuneration of such Whole Time Directors/CMD through their respective appointment orders/pay fixation orders. CMD and Whole Time Directors of MMTC are appointed by the President of India, generally with a service contract of five years or till the date of superannuation or further orders of the government whichever is earlier. The Functional Directors so appointed by the President of India are entitled for three months' notice period/severance fees. The functional members of the Board of Directors are entitled to performance Related Pay in terms of Guidelines issued by the Department of Public Enterprises, Govt. of India. Non-official Part Time (Independent) Directors are presently entitled to a sitting fee @Rs.15000/- for attending each meeting of the Board/Board appointed Committees. None of the Non- Executive Directors had any pecuniary relationship or transaction with the company.

The details of remuneration paid for 2021-22 to Functional Directors including CMD are given below:

Name of Director	Salary & benefits (Rs.)	Performance related pay during 2021-22*	Bonus, Stock option, pension, severance fee	No. of shares of MMTC held as on 31.3.2022
Executive Directors				
Mr. Kapil Kumar Gupta	4335300	Nil	Nil	Nil
Mr. R.R. Sinha	4406230	Nil	Nil	Nil
Mr. J.Ravi Shanker	4837989	Nil	Nil	Nil

Meetings of the Board

The meetings of the Board are generally held at the registered office of the company and are scheduled well in advance. The Board of MMTC meets regularly at least once in a quarter. The meetings of Board are governed by a structured agenda and any other member of the Board is free to recommend inclusion of any subject matter in the agenda for deliberations. Detailed agenda papers including explanatory notes are circulated in advance on all major issues to facilitate the Board to take well-Informed and independent decisions.

During the year, the Board of directors met seven times i.e. on 16.4-2021, 08.06.2021, 15.7.2021, 27.10.2021, 7.1.2022 & 09.03.2022 & 23.3.2022. The attendance of the Directors at these Board Meetings and the last AGM on 23rd April, 2022 is as under: -

	Name of The Director	No. of Board meetings Held during the period the Director was on Board	No. of Board Meetings attended	Presence at Previous AGM held on 23.04.2022
(a)	Functional Directors			
	Mr. Vibhu Nayar , CMD (Addl Charge)	2	2	Yes
	Mr. Sanjay Chadha, CMD (addl Charge)	5	4	NR
	Mr. J. Ravi Shanker	7	7	Yes
	Mr. R.R. Sinha	7	7	Yes
	Mr. K.K. Gupta	7	7	Yes
(b)	Ex-officio Part Time Directors			
	(Govt. Nominee)			
	Mr. Shashank Priya	7	6	No
	Mr. Shyamal Misra	4	4	NR
	Mr Vipul Bansal	3	2	NO
(c)	Non- official Part Time(Independent) Directors			
	Mr. G. Manjunath	4	2	Yes
	Dr.(Mrs.) Swadhinta Krishna	7	7	Yes
	Dr . P. K. Varma	3	2	Yes`

Separate Meeting of Independent Directors

A Separate Meeting of Independent Directors was held on 30th March, 2022 in terms of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015, Schedule IV of Companies Act, 2013 and as per the Guidelines issued by DPE on Role & Responsibilities of Non- Official Directors (Independent Directors) of CPSEs. All the Independent Directors as on that date attended the said Meeting.

Declaration by Independent Directors

All the Independent Directors in the first board meeting they attended as Independent Director and first meeting held at the beginning of the financial year gave a declaration that they meet the criteria of independence as provided under Section 149(6) of the Companies Act, 2013, Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation, 2015 and DPE Guidelines on Corporate Governance for CPSEs.

A detailed presentation is given to every Independent Director about the business of the Company in order to familiarize them with Company's business and to enable them to function effectively, besides Independent directors are also being nominated in different training programs organized by Department of Public Enterprises from time to time. Details of nomination of independent directors in such programs is available at <http://mmtclimited.com/pages/display/294-training-programme-for-directors>.

Performance Evaluation of Board Members

Ministry of Corporate Affairs vide Circular dated 5th June 2015 has exempted Govt. companies from the provisions of Section 178(2) which provides for manner of performance evaluation of Board of Directors, Committee of Board of Directors and director by the Nomination & Remuneration Committee. Similar exemption is also expected from SEBI under the SEBI(LODR) Regulations, 2015. The above mentioned circular of MCA also exempted Govt. Companies from provisions of Section 134(3)(p) which requires mentioning the manner of formal evaluation of its own performance by the Board and that of its Committees/Individual director in Board's Report, if directors are evaluated by the administrative ministry/department of the Central Govt./State Govt. as per its own evaluation methodology. In this regard, DPE has already laid down a mechanism for performance appraisal of functional directors. DPE has also initiated evaluation of Independent Directors.

It may further be mentioned that MMTC entered into MOU with Govt of India (Ministry of Commerce & Industry) each year, containing key performance parameters for the company till 2021-22. The MOU targets are considered and form an integral part of performance appraisal of the individuals. The MOU covers all operational and performance parameters including financial targets, cost cutting targets, community development and any other relevant factor. The performance of the company is evaluated annually by the DPE vis-à-vis MOU entered into with the Govt. of India.

COMMITTEES OF THE BOARD

To facilitate expeditious consideration and arriving at decisions with focused attention on the affairs of the company, the Board has constituted following Committees with distinct role, accountability and authority:

1. Audit Committee of Directors
2. Nomination & Remuneration Committee of Directors



3. Stakeholders Relationship Committee
4. Share Transfer Committee
5. Committee of Directors on Personnel Policies
6. Committee of Directors on Subsidiary, Joint Venture & Associate Companies
7. Committee of Directors on CSR and Sustainability
8. Functional Management Committee of Directors
9. Risk Management Committee of Directors
- 1. Audit Committee of Directors**

The Audit Committee of the company constituted by the Board Comprised of two Part Time Non-Official (Independent) Directors and one Part Time (Govt. Nominee) Director as on 31.03.2021. All the meetings of the committee held during the year were chaired by non-executive Independent Director. Company Secretary is the Secretary to the Committee. The terms of reference of the Audit Committee include overseeing the audit function, reviewing critical findings, ensuring compliance with accounting standards and concurring financial statements before submission to the Board. The role, scope and authority of Audit Committee also include the requirements under the relevant provisions of the Companies Act, 2013 and the SEBI (Listing obligations and Disclosure Requirements) Regulations, 2015("Listing Regulation").

During the year 2021-22, the Committee met four times as detailed hereunder:-

S. No.	Date of Meeting	Member Present	Chairperson
1	15-04-2021	Shri Shashank Priya Dr.(Mrs.)Swadhinta Krishna	Shri Manjunath G
2	11.8.2021	Shri Shashank Priya Dr. (Mrs.) Swadhinta Krishna	Shri Manjunath G
3	27.10-2021	Shri Shashank Priya Dr.(Mrs.)Swadhinta Krishna	Shri Manjunath G
4	21.02.2022	Shri Shashank Priya Dr.(Mrs.)Swadhinta Krishna	Dr Pradeep kumar Varma
5	23-03-2022	Dr.(Mrs.)Swadhinta Krishna	Dr Pradeep kumar Varma

Other functional Directors and Statutory Auditor of the Company also attended the above meetings to assist the Audit Committee in its deliberations. The minutes of the above meetings were regularly submitted to the Board for its information.

Further it is also confirmed that there was no recommendation of Audit Committee which was not accepted by the Board.

2. Nomination & Remuneration Committee of Directors:

Pursuant to the provision of Companies Act, 2013 and applicable provisions of Listing Regulations, the Nomination & Remuneration Committee of Directors comprises of Dr.(Mrs.) Swadhinta Krishna, Part Time non-official (Independent) Director as Chairperson, Shri P. K. Varma, Part Time Non-official (Independent) Director and Shri Shashank Priya, Govt. Nominee Director as its Members as on 31.03.2022. The Committee performs such functions and duties and exercises such powers as specified in Part D of Schedule II of Listing Regulations, DPE Guidelines dated 26th November 2008. The Company Secretary is the Secretary of the Committee. During the year 2021-22, the Committee met once as detailed hereunder: -

S No	Date of Meeting	Members Present	Chairperson
1	30.3.2022	Shri Shashank Priya Dr P K Varma	Dr.(Mrs.) Swadhinta Krishna

The minutes of the said meeting were submitted to the Board of Directors for information.

3. Stakeholders Relationship Committee

The Composition of Stakeholder Relationship Committee constituted by the Board of Directors comprised of Dr.(Mrs) Swadhinta Krishna, Part Time non-official (Independent) Director, as its Chairperson, Shri Vipul Bansal, JS, DOC, and Shri Kapil Kumar Gupta, Director(Finance), MMTC as its members as on 31.3.2022. Company Secretary is the Secretary to the Committee. The Committee expeditiously considers and monitors the resolution of grievances of the shareholders/other investors. During 2021-22 one meeting of this committee was held, details are as under;

S No	Date of Meeting	Member Present	Chairperson
1	31.3.2022	Shri K.K. Gupta	Dr.(Mrs.) Swadhinta Krishna

Details of Investor Complaints/Grievances during the FY 2021-22:

No. of complaints pending as on 1.4.2021	No. of Complaints received during the year	No. of complaints resolved during the year	No. of Complaints pending as on 31.03.2022
6	15	18	3

4. Share Transfer Committee

Share Transfer Committee constituted by the Board of Directors comprised of all Functional Directors, MMTC as its members and Company Secretary as Secretary to the Committee expeditiously considers and approves requests for physical share transfers, re-materialization and de-materialization etc. During 2021-22 no meeting of this committee was held.

5. Committee of Directors on Personnel Policies

The Committee of Directors on Personnel Policies constituted by the Board comprised of Dr.(Mrs) Swadhinta Krishna Part Time Non-Official (Independent) Director as its Chairperson, Dr P K Varma, Independent Director and Shri K K Gupta, Director(Finance) MMTC as its Members to consider and recommend approval of modifications/formulation of service rules and other personnel policies to the Board of Directors. The Company Secretary is the Secretary to the Committee. During 2021-22 no meeting of this Committee was held.

6. Committee of Directors on Subsidiary, Joint Venture & Associate Companies

The Board of Directors has constituted a "Committee of Directors on Subsidiary, joint Venture and Associate Companies to consider and recommend approval of investments/disinvestments, approval of basic parameters/ charter/ Agreement and any changes therein to the Board of Directors, review with functional management and advice on strategic issues related to MMTC's investment; and the performance of projects/ joint ventures/associate companies/foreign offices/subsidiaries of MMTC.

There was no change in constitution of this Committee during the year and during 2021-22 no meeting of this Committee was held.

7. Committees of Directors on CSR & Sustainability

The Committees was constituted to regulate and monitor the CSR activities of the Company, in accordance with applicable provisions of Companies Act, 2013 and DPE Guidelines in this regard issued from time to time. As on 31.03.2022, the Composition of the Committee included Shri Shashank Priya (SS & FA-MOC&I) as Chairman, Shri P. K. Varma , Part Time Non-official(Independent) Director, Director(Personnel) and Director (Finance)as its Members. The Company Secretary is the secretary of the Committee.

During 2021-22 one meeting of this committee was held and details are hereunder: -

S No	Date of Meeting	Member Present	Chairperson
1	30.3.2022	Dr P. K. Varma Shri R.R. Sinha	Shri Shashank Priya

The minutes of the said meeting were submitted to the Board of Directors for information.

8. Functional Management Committee of Directors

The "Functional Management Committee of Directors" constituted by the Board of Directors Consist of CMD, MMTC as the Chairman of the Committee, all Functional Directors as members and Company Secretary as Secretary to the Committee. The said Committee has been delegated the powers to take decision(s) in all matters over and above the powers delegated to CMD by the Board of Directors from time to time, except the matters specified under the Companies Act,2013/other Statutes, to be considered and decided at the meeting of Board of Directors and/or shareholders as also the matters specified and reserved by Board for its decisions or for consideration and decisions of any other committee constituted by Board of Directors under Article 99 of Articles of Association of MMTC. During 2021-22 only one meeting of this Committee was held on 10.5.2021. The minutes of these meetings was submitted to Board of Directors for information. However, since the Company is not having regular CMD presently, this Committee has been dissolved and a new Committee named "Committee of Functional Directors & Senior Officers" has been constituted by the Board on 23.03.2022.

9. Risk Management Committee of Directors

Risk Management Committee of Directors comprising of Director(Finance) as Chairman all functional Directors of the Company as members and CMD as Chairman of the Committee was constituted in August 2016. As on 31.3.2022, the Committee comprised of Director(Finance) as Chairman, Dr P K Varma, Independent Director, Shri J Ravi Shanker, Director(Marketing) and Shri R R Sinha, Director(Personnel) as members of the Committee. The said Committee shall function as per the roles specified under the Listing Regulations and other provisions of any other Statutes as amended from time to time. Company Secretary shall continue to be the Secretary to the Committee. During 2021-22 two meetings of this committee were held and details are hereunder: -



S No	Date of Meeting	Members Present	Chairperson
1	24.3.2022	Dr P. K. Varma Shri J. Ravi Shanker Shri R.R. Sinha	Shri K.K. Gupta
2	31.3.2022	Dr P. K. Varma Shri J.Ravi Shanker Shri R.R. Sinha	Shri K.K. Gupta

GENERAL BODY MEETINGS

General Body Meetings of the Company are held at/in the vicinity of registered office of the Company. The details of such meetings held during the past three financial years are as under:-

Nature of meeting	Date & time	Special Resolution passed
56th Annual General Meeting	30.09.2019 at 1130 hrs	Nil
57th Annual General Meeting	24.12.2020 at 1130 hrs	Nil
58th Annual General Meeting	23.04.2022 at 1130 hrs	Nil

Disclosures

- None of the members of the Board of Directors had any pecuniary relationship or transaction with the company.
- There have been no materially significant related party transactions i.e. transactions of the company of a material nature, with its promoters, the directors, or the subsidiaries or relatives etc. that may have potential conflict with the interests of the Company at large. Other details of "Related Party transactions" have been disclosed in the Notes forming part of Accounts in the Annual Report.
- The Company has not opted for Employees Stock Option Scheme.
- The company has framed the "Whistle Blower Policy" which has been hoisted on MMTCL's website.
- The company has established a vigil mechanism and same has been uploaded on the website of the company.
- Company has broadly complied with all the requirements of SEBI(LODR) Regulations, 2015, the Companies Act, 2013 and Guidelines on Corporate Governance for CPSEs issued by DPE, Govt. of India except as mentioned in the Report.
- There were no penalties or strictures imposed on the company by the Stock Exchanges or SEBI or any other Statutory Authority on any matter related to the capital markets during the last three years.
- Pursuant to clause 9(n) of Part C of Schedule V of SEBI(LODR) Regulations, 2015, the disclosure regarding commodity risks by listed entities is placed at Annexure-C to this Report.

CEO/CFO Certification

As required under Regulation 17(8) of SEBI(LODR) Regulations, 2015, the Certificate duly signed by Chairman & Managing Director and CFO of the company was placed before the Board of Directors at the meeting held on 8th July 2022 and the same is annexed (Annexure-A) to Corporate Governance Report.

Means of Communications

The quarterly, half-yearly unaudited results of the Company are normally announced within 45 days of the end of respective period, and annual audited results of the Company are announced within 60 days, which are published in leading national dailies, besides hoisting them on the website of the company i.e. www.mmtclimited.com. However, during the year 2021-22, due to various compelling reasons, these could not be approved by the Board in time.

Shareholders information

- Annual General Meeting

The 59th Annual General Meeting of the Company is scheduled to be held on 08.12.2022 through Video Conferencing ("VC")/Other Audio Visual Means("OAVM").

- Financial Calendar for 2022-23

Adoption of quarterly results for the quarter ending	Last date for adoption of Financial Results
June 30, 2022	14th August, 2022 (approved by the Board on 30.8.2022)
September 30, 2022	14th November, 2022
December 31, 2021	14th February, 2023
March 31, 2022	30th May, 2023

- Dates of Book Closure

The Share Transfer Books and Register of Members shall remain closed from 03.12.2022 to 08.12.2022 (both days inclusive) for the purpose of AGM.

- (d) Dividend Payment- Pursuant to provisions of Section 43A of SEBI (LODR) Regulations, 2015: The Company has formulated a Dividend Distribution Policy annexed herewith at Annexure-B and the same is available at [https://mmtclimited.com/files/dividend % 20distribution %20policy.pdf](https://mmtclimited.com/files/dividend%20distribution%20policy.pdf). The details of dividend paid during the last three years are as under:

Year	2019-20	2020-21	2021-22
Rate	NIL	Nil	NIL
Date	NIL	Nil	NIL

- (e) Listing on stock exchanges: The Shares of the company continue to be listed at BSE and NSE. Listing fees for F.Y. 2021-22 has already been paid to both stock exchanges.
- (f) Market Price Data: The month-wise market price data of MMTC's scrip quoted/traded at Bombay Stock Exchange/NSE during the financial year 2021-22 is given below:

Month	High (Rs)	Low (Rs)	Month	High (Rs)	Low (Rs)
Bombay Stock Exchange			National Stock Exchange		
April 2021	46.6	37.2	April 2021	46.55	37.3
May 2021	62.15	40.5	May 2021	62.2	40.6
June 2021	63.95	53.2	June 2021	63.95	53.2
July 2021	57.45	47.35	July 2021	57	47.35
August 2021	51.35	38.95	August 2021	51.4	39.05
September 2021	48.2	42.45	September 2021	48.25	42.5
October 2021	51.9	41.2	October 2021	51.9	41.1
November 2021	44.3	34.85	November 2021	44.35	34
December 2021	48.55	38.9	December 2021	48.65	38.95
January 2022	64.8	44.25	January 2022	64.7	44.2
February 2022	61.25	41.15	February 2022	61.2	41.05
March 2022	49.65	43.85	March 2022	49.7	43.8

- (g) **Registrar & Transfer Agents (RTA):** M/s. MCS Share Transfer Agent Limited, F-65 Okhla Industrial Area, Phase I, New Delhi -110020, is the Registrar & share Transfer Agent of the Company effective from 1st April 2015, for shares held both in physical as well as in dematerialized mode.
- (h) **Dematerialization of Shares:** The shares of MMTC Ltd continue to be an eligible security for trading in dematerialized form by CDSL and NSDL with ISIN No: **INE123F01029**. As on 31st March 2022, out of 150 crores equity shares of MMTC Ltd of face value of Re.1/- each, 1348903143 shares are held by the President of India and 151092112 shares by others in dematerialized form leaving only 3801 shares in physical form.
- (i) **Share Transfer System:** The transfer of shares held in dematerialized form are processed and approved in electronic form by NSDL/CDSL through respective depository participants. No transfer was pending as on 31.03.2022. Share transfers in physical form has been discontinued by SEBI w.e.f. 1.4.2019. Share transfers/transmission and all other investor related activities are attended to and processed at the office of RTA i.e. MCS Share Transfer Agent Ltd.
- (j) **Distribution of shareholding as on 31.3.2022:** The Distribution of shareholding as on 31.3.2022 is tabulated here-in-below:



Category Code	Category of Shareholder	No of Share holders	Total Number of Shares	Total share holding as % age of total number of shares
(A)	Shareholding of Promoter and Promoter Group			
(i)	Central Govt.	1	1348903143	89.9269
(B)	Public shareholding			
(a)	Central Govt./State Govt.	1		
(b)	Mutual Funds/AIF	4	145809	0.0097
(c)	Financial Inst./Banks	2	650	0.0000
(d)	Insurance Companies	5	38286728	2.5524
(e)	Foreign Portfolio Investors	3	981972	0.0655
	Non-Institutions			
(a)	Bodies Corporate	588	4302779	0.2869
(b)	Individual holders having share capital up to Rs 2 lakh	196399	104330060	6.9553
(c)	Individual holders having share capital in excess of Rs 2 lakh	5	1248163	0.0832
(d)	Trust and Foundations	9	10250	0.0007
(e)	Non Resident Individuals	1248	1720783	0.1147
(f)	NBFCs registered with RBI	2	42500	0.0028
(g)	Cooperative Societies	1	5000	0.0003
(h)	IEPF	1	22163	0.0015
	TOTAL	198268	1500000000	100

Note: There are no outstanding GDRs/ADRs/warrants/convertible instruments.

(k) Top 10 Public Shareholders as on 31st March, 2022

S.No	Name	No. of Shares held	% of total shares
1	LIFE INSURANCE CORPORATION OF INDIA	34613606	2.3076
2	THE NEW INDIA ASSURANCE COMPANY LIMITED	1712446	0.1142
3	GENERAL INSURANCE CORPORATION OF INDIA	1000000	0.0667
4	GOLDMAN SACHS (SINGAPORE) PTE -ODI	750000	0.0500
5	NATIONAL INSURANCE COMPANY LTD	675268	0.0450
6	HARSHI AGRAWAL	317432	0.0212
7	THE ORIENTAL INSURANCE COMPANY LTD	285408	0.0190
8	PARAG ANOP SHAH	250003	0.0167
9	Ravi kumar Ramkishore Sanwalka	233000	0.0155
10	GHANSHYAM GARG	229977	0.0153

(l) Distribution of Shareholding as on 31st March 2022

Category(Shares)	No. of Shares	% of Shareholders	Total No. of Shareholding	% of Shareholders
1-500	20841887	1.3895	161629	81.4683
501-1000	14900180	0.9933	18387	9.2679
1001-2000	14712900	0.9809	9611	4.8444
2001-3000	8619269	0.5746	3316	1.6714
3001-4000	4868546	0.3246	1350	0.6805
4001-5000	5578078	0.3719	1178	0.5938
5001-10000	12994296	0.8663	1753	0.8836
10001-50000	20586830	1.3725	1069	0.5888
50001-100000	4932388	0.3288	70	0.0353
And Above	1391965626	92.7977	32	0.0161
Total	1500000000	100	198395	100

(m) Geographical Distribution of Shareholders as on 31st March 2022

CITY	No. of Shareholders	% of total shareholders	No. of Shares	% of Total Shares
AHMEDABAD	8148	4.11	5987031	0.4
BANGLORE	5214	2.63	3363599	0.22
BHUBANESWAR	632	.32	338087	0.02
CHANDIGARH	798	.4	569018	0.04
CHENNAI	3735	1.88	3301694	0.22
DELHI	17744	8.94		90.60
GUWAHATI	406	.20	30064	0.02
HYDERABAD	3834	1.93	2460360	0.16
JAIPUR	3733	1.88	2181650	0.15
KANPUR	1219	.61	601519	0.04
KOLKATA	5491	2.77	5281683	0.35
MUMBAI,THANE,NAVI MUMBAI	18269	9.21	56346100	3.76
NAGPUR	1395	.70	559642	0.04
NCR	6564	3.31	4141917	0.28
OTHERS	116749	58.85	53124467	3.54
PATNA	1123	0.57	513270	0.03
TRIVANDRUM	253	0.13	87251	0.01
OTHERS	3088	1.56	1842348	0.12

(n) Shareholders/ other Investor's Grievances:

Shareholders/ other Investors may also lodge their grievance(s) with Company Secretary- email id: ganarayanan@mmtclimited.com

(o) Address for Correspondence:

Board Secretariat, MMTC Limited, Core-I, Scope Complex,
7, Institutional Area, Lodi Road, New Delhi – 110 003
Phone No: 011 - 24361889
E-mail: mmtc@mmtclimited.com



Annexure-A to Corporate Governance Report

Pursuant to provisions of Regulation 17(8) of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015, it is hereby certified that :

- a) The Financial statements and the cash flow statement for the year ended 31.3.2022 have been reviewed and that to the best of our knowledge and belief :
 - i) these statements do not contain any materially untrue statement or omit any material fact or contain statements that might be misleading.
 - ii) these statements together present a true and fair view of the company's affairs and are in compliance with existing accounting standards, applicable laws and regulations
- b) There are, to the best of our knowledge and belief, no transactions entered into by the company during the year which are fraudulent, illegal or violative of the company's code of conduct.
- c) Certain provisions could not be complied with during 2021-22 relating to contribution to CPF, holding of AGM/filing of Return and consideration of UFR by Board for December, 2021 quarter. Further, business of the company has been downsized substantially as per the direction of MoC. Hence, at present, the company is not doing business and may face financial difficulties. MMTC has delayed payment of salaries/other dues. The company is undergoing restructuring exercise through VRS/VSS scheme and closure of offices. Hence, some of the above requirements are not strictly applicable on MMTC.
- d) We accept responsibility for establishing and maintaining internal controls for financial reporting and that we have evaluated the effectiveness of the internal control systems of the company pertaining to financial reporting and we have disclosed to the auditors and the Audit Committee, deficiencies in the design or operation of such internal controls, if any, of which we are aware and the steps we have taken or propose to take to rectify these deficiencies.
- e) We have indicated to the auditors and the Audit committee
 - i. Significant changes in internal control over financial reporting during the year;
 - ii. significant changes in accounting policies during the year and that the same have been disclosed in the notes to the financial statements; and
 - iii. instances of significant fraud of which we have become aware and the involvement therein, if any, of the management or an employee having a significant role in the company's internal control system over financial reporting.

Sd/-
(Kapil Kumar Gupta)
Director(Finance) & CFO

Sd/-
(R.R. Sinha)
Director (P)

Sd/-
(J Ravi Shankar)
Director (Mktg.)

Sd/-
(Vibhu Nayar)
Chairman and Managing Director

Annexure – B to Corporate Governance Report Dividend Distribution Policy of MMTC Limited

I Background

Pursuant to Regulation 43A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, which requires top five hundred listed entities based on market capitalization (calculated as on 31st March of every financial year) to formulate a dividend distribution policy which shall be disclosed in their annual reports and on their websites.

Since MMTC is amongst the top 500 listed entities as per the criteria as at March 31, 2016, the dividend distribution policy has been formulated.

II Policy Framework

The policy has been framed broadly in line with the provisions of the Companies Act and also taking into consideration, guidelines on “Capital Restructuring of Central Public Sector Enterprises” issued by Department of Investment and Public Asset Management (DIPAM), Ministry of Finance, Department of Public Enterprises, SEBI and other guidelines, to the extent applicable.

III Factors in consideration

MMTC has been consistently paying dividends and is committed to deliver sustainable value to all stakeholders. Dividend is declared at the Annual General Meeting of the shareholders of the Company, based on the recommendations of the Board of Directors. It is at the discretion of the Board to recommend dividend. The Board may also declare interim dividend.

The decision regarding dividend pay-out is a crucial decision as it balances the amount of profit to be distributed among shareholders of the company with the requirement of deployment of internal accruals for its sustenance and growth plans. The factors generally considered before recommending/declaring dividend are as follows:

A. Circumstances under which the shareholders of the Company may or may not expect dividend

The factors that may generally be considered by the Board before making any recommendations for the dividend include, but are not limited to, future capital expenditure plans, profits earned during the financial year, cost of raising funds from alternate sources, cash flow position and applicable taxes including tax on dividend, subject to the guidelines as applicable from time to time..

B. Financial Parameters that shall be considered while declaring dividend

Being a Central Public Sector Enterprise, the Company endeavors to declare the dividend as per the guidelines on “Capital Restructuring of Central Public Sector Enterprises” issued by DIPAM,

Govt. of India on 27.05.2016, mandating every CPSE to pay a minimum annual dividend of 30% of PAT or 5% of the net-worth, whichever is higher subject to the maximum dividend permissible under the extant legal provisions.

Nonetheless, Company is expected to pay the maximum dividend permissible under the Act under which it has been set up, unless lower dividend proposed to be paid is justified on a case to case basis at the level of Ministry of Commerce & Industry after considering the following financial parameters:

- (i) Net-worth and Capacity to borrow;
- (ii) Long-term borrowings;
- (iii) CAPEX/Business Expansion needs;
- (iv) Retention of profit for further leveraging in line with the CAPEX needs; and
- (v) Cash and bank balance.

C. Internal and External factors that shall be considered for declaration of dividend

C.1 Internal Factors

Net Worth of the Company

As per the extant guidelines issued by DIPAM, Govt. of India, every CPSE would pay a minimum annual dividend of 30% of PAT or 5% of the net-worth, whichever is higher subject to the maximum dividend permissible under the extant legal provisions. Being a Government Company, MMTC is required to comply with these guidelines.

Apart from the above parameters, the Company may also consider various other internal factors, which inter alia include:



- Present & future capital requirements of the existing businesses;
- Additional investments in subsidiaries/associates of the Company;
- Any other factor as deemed fit by the Board.

C.2 External Factors

C.2.1 Economic Environment

In case of uncertain or recessionary economic and business conditions, the Company will endeavor to retain larger part of profits to build up reserves to sustain future updowns.

C.2.3 Statutory Provisions and Guidelines

The Company will adhere to the restraints imposed by Companies Act with regard to declaration of dividend. Further, being a Government Company, the Company shall also consider the guidelines in force in respect of dividend declaration as issued from time to time by the Govt. of India or by any other statutory bodies.

D. Utilization of Retained Earnings

The Company is engaged into trading of various commodities and part of its diversification measures, may form Joint Ventures in the line of business being carried out by the Company. The retained earnings will be deployed in line with the objects of the company as detailed in the Memorandum of Association of the company, thus contributing to the growth of the business and operations of the Company.

E. Parameters to be adopted with regard to various classes of shares

The holders of the equity shares of the Company, as on the record date, are entitled to receive dividends. Since the Company has issued only one class of equity shares with equal voting rights, all the members of the Company are entitled to receive the same amount of dividend per share. The policy shall be suitably revisited at the time of issue of any new class of shares depending upon the nature and guidelines thereof.

Other provisions

In case of any subsequent changes in any Statutory Act, Rules, Regulations etc. which makes any of the provisions in this policy inconsistent with them, then the provisions of the Statutory Act, Rules, Regulations etc. would prevail over the policy.

CMD is authorized to approve any minor modifications/ deviations to the policy and will be the competent authority for any interpretation with regard to this Policy.

Annexure – C to Corporate Governance Report

1. Risk management policy: The Board of directors approved the Risk Management Policy after the same has been duly approved by Audit committee of directors to take care of various risks associated with business undertaken by the company.
2. Exposure of the listed entity to commodity and commodity risks faced by the entity throughout the year.
 - a. Total exposure of the listed entity to commodities in INR and (b) Exposure of the listed entity to various commodities:

As on 31.03.2022

Commodity name	Exposure in INR towards the particular commodity Rs. Cr.	Exposure in Qty terms towards the particular commodity in KGS	% of such exposure hedged through commodity derivatives				Total
			Domestic Market		International Market		
			OTC	Exchange	OTC	Exchange	
GOLD	10.99	30.00	-	100%	-	-	100%
SILVER	12.81	240	-	-	-	-	-

Note :

1. Silver hedging started from October 2018
2. Commodity Risk faced by the corporation.

*Value arrived as per DRO books of accounts.



VAP & ASSOCIATES
Company Secretaries

Head Office:
387, First Floor, Shakti Khand-3,
Indrapuram, Ghaziabad-201010, U.P.
Tel: +91-0120-4272409
M: +91-9910091070, 9711670085
E-mail: vapassociatespcs@gmail.com

To
The Members,
MMTC Limited
Core-1 Scope Complex, 7 Institutional Area,
Lodhi Road, New Delhi-110003.

We have examined the compliance of conditions of Corporate Governance by MMTC LIMITED ("the Company") for the financial year ended March 31, 2022, as stipulated in Regulations 17 to 27 and clauses (b) to (i) of Regulation 46(2) and para C and D of Schedule V to the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the "Listing Regulations") and in Guidelines on Corporate Governance for Central Public Sector Enterprises (CPSEs), 2010 issued by the Department of Public Enterprises ("DPE Guidelines").

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

In our opinion and to the best of our information and according to the explanations given to us, we certify that the Company has complied with the conditions of Corporate Governance as stipulated in the Listing Regulations and DPE Guidelines during the financial year ended March 31, 2022, except:

- The composition of the Board was not in compliance with the provisions under Regulations 17(1)(b) of the SEBI (LODR) Regulations, 2015, as half of the Board does not comprise of Independent Directors on the Board during Audit period.
- Time gap between Risk Management Committee Meetings dated 31.03.2021 and 24.03.2022 is exceeding one hundred and eighty days as per Regulation 21(3C) of the Regulations. As informed by the management, the meeting of Risk Management Committee could not be convened within the stipulated time due to unavailability of members and chairman of the Committee.
- As per the DPE Guidelines where Board of Directors is headed by an Executive Chairman, the number of Independent Directors shall be at least 50% of Board Members.

As informed by the management, the Company is under administrative control of Ministry of Commerce & Industry, Government of India ('Administrative Ministry') and Directors are appointed by the Government of India. The Company has referred the matter to the Administrative Ministry for appointment of requisite number of Independent Directors.

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

For VAP & Associates
Company Secretaries
FRN: S2014UP280200
Peer Review No: 1083/2021

Parul Jain
Proprietor
M. No. F8323
CP No. 13901
UDIN: F008323D000948174

Date: 09.09.2022
Place: Ghaziabad

MMTC Limited

Business Responsibility Report for FY 2021-22

About the Company

MMTC Ltd. a Mini Ratna Category-I Central Public Sector Undertaking (CPSE), was incorporated in 1963 and is one of the largest International trading companies in the country. The registered office of the Company is situated at Core-1, SCOPE Complex, 7, Institutional Area, Lodi Road, New Delhi – 110 003, India. The Company has Regional Offices/ Sub-Regional Offices in major cities of India and a wholly owned subsidiary – MMTC Transnational Pvt. Ltd (MTPL), Singapore.

Corporate Mission

As the largest trading company of India and a major trading company of Asia, MMTC aims at improving its position further by achieving sustainable and viable growth rate through excellence in all its activities, generating optimum profits through total satisfaction of shareholders, customers, suppliers, employees and society.

Corporate Objectives

- To be a leading International Trading House in India operating in the competitive global trading environment, with focus on “bulk” as core competency and to improve returns on capital employed.
- To retain the position of single largest trader in the country for product lines like minerals, metals and precious metals.
- To promote development of trade-related infrastructure.
- To provide support services to the medium and small scale sectors.
- To render high quality of service to all categories of customers with professionalism and efficiency.
- To streamline system within the Company for settlement of commercial disputes.
- To upgrade employees’ skills for achieving higher productivity.

Business Responsibility Report – FY 2021-22

As per the Clause 55 of the Listing Agreement of the Securities Exchange Board of India [SEBI] introduced in 2012, the top Five Hundred listed companies in terms of market capitalisation have been mandated to issue annual Business Responsibility Report [BRR].

SECTION A: GENERAL INFORMATION ABOUT THE COMPANY

1. Corporate Identity Number (CIN) of the Company
L51909DL1963GOI004033
2. Name of the Company
MMTC LIMITED
3. Registered address
**Core-1, Scope Complex,
7 Institutional Area, Lodhi Road,
New Delhi -110003**
4. Website
www.mmtclimited.com
5. E-mail id
mmtc@mmtclimited.com
6. Financial Year reported
2021-22



7. Sector(s) that the Company is engaged in (industrial activity code-wise)
Trading
8. List three key products/services that the Company manufactures/provides (as in balance sheet)
 - (i) **Precious Metals**
 - (ii) **Fertiliser**
 - (iii) **Coal & Hydrocarbon**
9. Total number of locations where business activity is undertaken by the Company
 - i. Number of International Locations (Provide details of major 5)
1 Subsidiary Company in Singapore
 - ii. Number of National Locations
5 Regional Offices in India
10. Markets served by the Company – Local/State/National/International
Asia, Europe, Africa and Australia

SECTION B: FINANCIAL DETAILS OF THE COMPANY

1.	Paid up Capital (INR)	150 Crores
2.	Total Turnover (INR)	7,840.78 Crores
3.	Total profit after taxes 2021-22 (INR)	(241.93) Crores
4.	Total budgeted expenditure on Corporate Social Responsibility (CSR) as percentage of profit after tax (%)	MMTC incurred losses during FY 2019-20 & FY 2020-21. Accordingly, the CSR budget calculated in accordance with the Section 198 of the Companies Act-2013 i.e. 2% of average net profit of preceding 3 years was negative. Therefore, there was no annual CSR budget approved by Board of Directors for the year 2021-22. As such, no fresh CSR project was undertaken during FY 2021-22. However, the company only executed ongoing CSR projects of FY 2019-20 which were carried forward to FY 2021-22.
5.	List of activities in which expenditure in 4 above has been incurred	There was no annual CSR budget approved by Board of Directors for the year 2021-22. However, a sum of Rs. 10.01 lakhs was carried forward from previous years as the unspent CSR fund, out of which Rs. 3.24 lakhs was expended towards educational activities for the under privileged children and Rs. 1.50 lakhs towards Skill Development Project.

SECTION C: OTHER DETAILS

1. **Does the Company have any Subsidiary Company/ Companies?**
Yes. MMTC TRANSNATIONAL Pte LTD, SINGAPORE (Overseas Subsidiary Company)
Do the Subsidiary Company/Companies participate in the BR Initiatives of the parent company? If yes, then indicate the number of such subsidiary company(s)
- No
2. **Do any other entity/entities (e.g. suppliers, distributors etc.) that the Company does business with; participate in the BR initiatives of the Company? If yes, then indicate the percentage of such entity/entities? [Less than 30%, 30-60%, More than 60%]**
- No

SECTION D: BR INFORMATION

1. **Details of Director/Directors responsible for BR**
 - a. Details of the Director/Director responsible for implementation of the BR policy/policies for the year 2020-21

- DIN Number - **08487833**
- Name - **Shri Rajiv Ranjan Sinha**
- Designation - **Director (Personnel)**

b. Details of the BR head

S. No.	Particulars	Details
1.	DIN Number (if applicable)	
2.	Name	Sanjay Kaul
3.	Designation	Chief General Manager (Personnel)
4.	Telephone number	011-24360365
5.	e-mail id	skaul@mmtclimited.com

2. Principle-wise (as per NVGs) BR Policy/policies (Reply in Y/N)

- Principle 1** – Businesses should conduct and govern themselves with Ethics, Transparency and Accountability.
- Principle 2** – Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle.
- Principle 3** – Businesses should promote the wellbeing of all the employees.
- Principle 4** – Businesses should respect the interests of, and be responsive towards all the stakeholders, especially those who are disadvantaged, vulnerable and marginalized.
- Principle 5** – Businesses should respect and promote human rights.
- Principle 6** – Businesses should respect, protect and make efforts to restore the environment.
- Principle 7** – Businesses, when engaged in influencing public and regulatory policy should do so in a responsible manner.
- Principle 8** – Businesses should promote inclusive growth and equitable development.
- Principle 9** – Businesses should engage with and provide value to their customers and consumers in a responsible manner.

S.No.	Question	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
1.	Do you have policy/policies for...	Y	Y	Y	Y	Y	Y	N	Y	Y
2.	Has the policy being formulated in consultation with the relevant stakeholders?	Y		Y	Y	Y			Y	
3.	Does the policy conform to any national /international standards? If yes, specify? (50 words)	N		Y	Y	Y			Y	Y
4.	Has the policy being approved by the Board? Is yes, has it been signed by MD/ owner/ CEO/ appropriate Board Director?	Y		Y	Y	Y			Y	
5.	Does the company have a specified committee of the Board/ Director/Official to oversee the implementation of the policy?	Y		Y	Y	Y				
6.	Indicate the link for the policy to be viewed online?	www.mmtclimited.com		www.mmtclimited.com						
7.	Has the policy been formally communicated to all relevant internal and external stakeholders?	Y		Y	Y	Y			Y	
8.	Does the company have in-house structure to implement the policy/policies.	Y		Y	Y	Y			Y	



9.	Does the Company have a grievance redressal mechanism related to the policy/policies to address stakeholders' grievances related to the policy/policies?	Y		Y	Y	Y				
10.	Has the company carried out independent audit/evaluation of the working of this policy by an internal or external agency?	Y		Y		Y				

2a. If answer to S. No. 1 against any principle, is 'No', please explain why: (Tick up to 2 options)

S.No.	Question	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8
1.	The company has not understood the Principles								
2.	The company is not at a stage where it finds itself in a position to formulate and implement the policies on specified principles							✓	
3.	The company does not have financial or manpower resources available for the task								
4.	It is planned to be done within next 6 months								
5.	It is planned to be done within the next 1 year								
6.	Any other reason (please specify)								

3. Governance related to BR

Indicate the frequency with which the Board of Directors, Committee of the Board or CEO to assess the BR performance of the Company. Within 3 months, 3-6 months, Annually, More than 1 year?

The Board of MMTC has been meeting atleast within 3 months. The meetings of the Board are governed by a structured agenda for discussions. Detailed agenda papers including other explanatory notes are circulated in advance on all major issues to enable the Board to take informed and independent decisions.

To facilitate expeditious consideration and arriving at decisions with focused attention on the affairs of the company, the Board has constituted various committees with distinct role, responsibility and authority. The top management reviews the performance of the organization in every meeting that was held atleast on quarterly basis. During the year 2021-22 MMTC's Management has discussed and reviewed following:

- Draft MoU with MoC&I
- HR related issues
- Review of investments in Jvs
- NINL related matters
- Share price & shareholding pattern of MMTC
- Status of working capital loan restructuring
- Approval of financial statements/results
- Annual Report on CSR/ BRR for 2020-21
- CSR related issues.

Does the Company publish a BR or a Sustainability Report? What is the hyperlink for viewing this report? How frequently it is published?

As per the mandate by SEBI top 500 companies by market capital have to prepare the BRR. MMTC has been publishing its BRR since 2012-13 regularly despite not being positioned in the top 100 listed Companies. The BRR forms a part of the annual report, and can be viewed on the Company's official website www.mmtclimited.com.

The organization is also a member of the United Nations Global Compact Network (UNGCN) and submits its Communication on Progress [COP] report annually. This is available to all these stakeholders on UNGC's website.

SECTION E – PRINCIPLE WISE PERFORMANCE

Principle 1 – Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

1. Does the policy relating to ethics, bribery and corruption cover only the company?

Yes. The ethical conduct of the Company is reflected in the various policy initiatives. While the Employees Conduct, Discipline & Appeal Rules cover the employees at all levels in the organization, a separate guideline in the form of "Code of Business Conduct & Ethics for Board Members and Senior Management" of MMTC Limited is given for governing the conduct of Senior Management (including Board level executives). In addition, to promote ethical business, policies like Integrity Pact, Whistle Blower Policy and Citizen Charter have been put into operation.

Does it extend to the Group/Joint Ventures/ Suppliers/Contractors/NGOs /Others?

Yes, the Integrity Pact adopted for all the procurement tenders beyond a threshold value, Citizen Charter extends its purview to vendors, buyers, suppliers, contractors etc. while the code of conduct, whistle blower policy and Audit Committee Vigil Mechanism covers only the employees of the company. Company also engages Independent External Monitors (IEMs) in line with CVC guidelines and undertakes preventive vigilance measures.

2. How many stakeholder complaints have been received in the past financial year and what percentage was satisfactorily resolved by the management? If so, provide details thereof, in about 50 words or so.

A total number of 39 public grievances were received during the year 2021-22 on CPGRAMS portal and all of them have been closed.

Principle 2 – Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle

MMTC is majority in the business of trading and is also engaged in fabrication of gold and silver medallion of different denominations. MMTC ensures highest quality of the products it trades and ensures fabrication of medallion as per BIS.

Principle 3 – Businesses should promote the wellbeing of all the employees

1. Please indicate the Total number of employees

The total number of employees as on 31.03.2022 is 597 (including Board level executives)

2. Please indicate the Total number of employees hired on temporary/contractual/casual basis.

No temporary/ contractual employee was engaged directly on the rolls of MMTC. However, based on requirement, certain maintenance works such as housekeeping, security, gardening, electrical repairs, furniture repair etc. are being carried out through outsourced services.

3. Please indicate the Number of permanent women employees.

Total number of permanent women employees – 120

4. Please indicate the Number of permanent employees with disabilities

Total number of permanent employees with disabilities – 14

5. Do you have an employee association that is recognized by management?

Yes

6. What percentage of your permanent employees is members of this recognized employee association?

100%

7. Please indicate the Number of complaints relating to child labour, forced labour, involuntary labour, sexual harassment in the last financial year and pending, as on the end of the financial year.

S. No.	Category	No. of complaints filed during the financial year	No. of complaints pending as on end of the financial year
1.	Child labour/forced labour/involuntary labour	0	0
2.	Sexual harassment	0	0
3.	Discriminatory employment	0	0

8. What percentage of your under mentioned employees were given safety & skill up-gradation training in the last year?

Aiming towards further enhancing / upgrading the skills of employees in the constantly changing business scenario, 205 (34.34%) employees were imparted training during the year in different spheres of company's activities. Due to pandemic situation in the country and restrictions imposed by the Government to contain it, mostly online training programmes (webinars) were organized. The training interventions held covered both functional & behavioural trainings. The employees deputed for webinars included 33 (16.10%) employees belonging to SC, 12 (5.85%) to ST and 89 (43.41%) women employees.

Principle 4 – Businesses should respect the interests of, and be responsive towards all the stakeholders, especially those who are disadvantaged, vulnerable and marginalized



1. Has the company mapped its internal and external stakeholders? Yes/No

Yes. Over the years of its existence, the organization has identified & engaged with a varied group of stakeholders – both internal like employees, shareholders & external such as customers, communities etc.

2. Out of the above, has the company identified the disadvantaged, vulnerable & marginalized stakeholders?

Yes, the organisation has identified vulnerable and marginalised stakeholders in the communities and has engaged with them through its CSR activities.

3. Are there any special initiatives taken by the company to engage with the disadvantaged, vulnerable and marginalized stakeholders. If so, provide details thereof, in about 50 words or so.

Yes. MMTC follows the presidential directives and guidelines issued by Government of India regarding reservation in services for SC/ ST/ OBC/ PWD (Persons with Disabilities)/ Ex servicemen to promote inclusive growth. Grievance/ Complaint Registers are also maintained at Corporate Office/ Regional Offices for registering grievances. Efforts are made to promptly dispose-off representations / grievances received from SC/ ST employees. Employees belonging to PWD have been assigned jobs which they can perform efficiently keeping in view their disability. A permanent ramp has been erected at the main entrance gate of Corporate Office for easy mobility of a PWD employee who uses wheel chair.

Corporate Office lifts have auditory signals announcing the floor destination. Some of them have floor requisition buttons in Braille Symbols. Also, there is separate washroom for PwD employees in the office building.

In addition, CSR activities are planned to maximize benefits to the disadvantaged, vulnerable and marginalized stakeholders. Engagement with these stakeholders is done through local Government bodies and NGOs working in the area.

Principle 5 – Businesses should respect and promote human rights

1. Does the policy of the company on human rights cover only the company or extend to the Group/Joint Ventures/Suppliers/Contractors/NGOs/Others?

Being a Government of India Company, MMTC owes allegiance to the Constitution of India, which resolves to secure to all its citizens justice, liberty, equality and fraternity and which also encompasses the fundamental human rights as envisioned in the Universal Declaration of Human Rights. MMTC stands committed to support and respect the protection of internationally proclaimed human rights at its work places and ensure that its employees enjoy the fundamental human rights. MMTC has 3 tier grievance redressal systems called “Sahayata” for resolving employees’ grievances. MMTC has in its management system provisions for health, safety and housing. Comprehensively covering all these aspects, MMTC has appropriate systems in place.

2. How many stakeholder complaints have been received in the past financial year and what percent was satisfactorily resolved by the management?

Nil.

Principle 6 – Businesses should respect, protect and make efforts to restore the environment

Manufacturing is not the main line of commercial activities of MMTC. This principle is therefore, not applicable.

1. Does the policy related to Principle 6 cover only the company or extends to the Group/Joint Ventures/Suppliers/Contractors/NGOs/others.

The company functions in an environmentally responsible fashion.

2. Does the company have strategies/ initiatives to address global environmental issues such as climate change, global warming, etc? Y/N. If yes, please give hyperlink for webpage etc.

Even though manufacturing is not the main line of commercial activities of MMTC, it is committed towards environmental upkeep through afforestation in the mining areas, development of tribal areas and in and around operation areas and by supporting sustainability initiatives through its CSR programs.

3. Does the company identify and assess potential environmental risks? Y/N

While the organization is not directly involved in manufacturing, it functions in an environmentally responsible fashion. MMTC adheres to the guidelines issued by Department of Public Enterprise, Govt. of India, as per which projects related to environmental aspects are identified & implemented.

4. Does the company have any project related to Clean Development Mechanism? If so, provide details thereof, in about 50 words or so. Also, if yes, whether any environmental compliance report is filed?

No

5. Has the company undertaken any other initiatives on – clean technology, energy efficiency, renewable energy, etc. Y/N. If yes, please give hyperlink for web page etc.

MMTC uses energy efficient star rated electrical equipments for energy conservation across the Organization.

MMTC has also installed a 50KWP Solar Power plant on the rooftop of its Delhi Regional Office at Jhandewalan and at MMTC Residential Colony, New Delhi.

6. Are the Emissions/Wastes generated by the company within the permissible limits given by CPCB/SPCB for the financial year being reported?

Not Applicable

7. Number of show cause/ legal notices received from CPCB/SPCB which is pending (i.e. not resolved to satisfaction) as on end of Financial Year.

Not Applicable

Principle 7 – Businesses, when engaged in influencing public and regulatory policy should do so in a responsible manner.

1. Is your company a member of any trade and chamber or association? If Yes, Name only those major ones that your business deals with

- a. FIEO
- b. SCOPE

2. Have you advocated/lobbied through above associations for the advancement or improvement of public good? Yes/No; if yes specify the broad areas (drop box: Governance and Administration, Economic Reforms, Inclusive Development Policies, Energy security, Water, Food Security, Sustainable Business Principles, Others).

The Organization has not advocated/lobbied through above Associations on any matters relating to public good.

Principle 8 – Businesses should promote inclusive growth and equitable development

1. Does the company have specified programmes/initiatives/projects in pursuit of the policy related to Principle 8? If yes details thereof.

MMTC has adopted Section 135 of the Companies Act, 2013, the CSR Rules of Ministry of Corporate Affairs and the CSR Guidelines issued by Department of Public Enterprises, Government of India. MMTC has structured process of spending a portion of its earnings in CSR activities that are directed towards the betterment of the society.

2. Are the programmes/projects undertaken through in-house team/own foundation/external NGO/government structures/any other organization?

MMTC has a Board Level Committee on CSR consisting of Independent Directors and Functional Directors with the Co. Secy. as Member Secretary. Various CSR proposals are initially assessed by the CSR Sub-Committee. The recommendation of the Sub-committee is then placed before the Board Level CSR Committee of Directors which independently deliberates and evaluates the viability of such projects proposed by the sub-committee and only upon their satisfaction such projects are placed before the Board of Directors for ratification. The status of implementation of projects so approved by the Board is put up for information of the CSR Committee as and when their meeting is convened.

Depending upon the geographical area in which the project will be undertaken, the concerned Regional/Sub-Regional Office is directed to monitor and implement the project either directly or in association with a private/public partner. For each project a nodal officer/office is duly appointed whose task is to monitor timely completion of the project and update the corporate office with respect to the status of completion of the project. Upon completion, the projects are evaluated by an independent agency.

3. Have you done any impact assessment of your initiative?

The Impact Assessment is undertaken by an independent agency in order to assess the “social impact” of the CSR activities undertaken by MMTC.

4. What is your company’s direct contribution to community development projects- Amount in INR and the details of the projects undertaken?

MMTC incurred losses during FY 2019-20 & FY 2020-21. Accordingly, the CSR budget calculated in accordance with the Section 198 of the Companies Act-2013 i.e. 2% of average net profit of preceding 3 years was negative. Therefore, there was no annual CSR budget approved by Board of Directors for the year 2021-22. As such, no fresh CSR project was undertaken during FY 2021-22. The company only executed ongoing CSR projects of FY 2019-20 which were carried forward to FY 2021-22.

However, a sum of Rs. 10.01 lakhs was carried forward from previous years as the unspent CSR fund, out of which Rs. 3.24 lakhs was expended towards educational activities for the under privileged children and Rs. 1.50 lakhs towards Skill Development Project.

5. Have you taken steps to ensure that this community development initiative is successfully adopted by the community? Please explain in 50 words, or so.

MMTC's CSR initiatives seek to strengthen community based organizations by engaging with the marginalized



especially women, youth, and children in activities that would improve their quality of life. The projects implemented by MMTC are first identified through the need assessment survey carried out by a professional agency and we ensure the participation of local community in identifying their needs, developing plans to address them, engaging them in implementation and also seek their feedback for further planning.

Principle 9 – Businesses should engage with and provide value to their customers and consumers in a responsible manner

- 1. What percentage of customer complaints/consumer cases are pending as on the end of financial year.**
Complaints are being resolved as per the policy of the company.
- 2. Does the company display product information on the product label, over and above what is mandated as per local laws? Yes/No/N.A. /Remarks(additional information)**
The company retails silver and gold medallions and silverware under the brand name SANCHI. The packaging of these items contains relevant product information.
- 3. Is there any case filed by any stakeholder against the company regarding unfair trade practices, irresponsible advertising and/or anti-competitive behaviour during the last five years and pending at end of financial year. If so, provide details thereof, in about 50 words or so.**
No such case is pending for redressal.
- 4. Did your company carry out any consumer survey/ consumer satisfaction trends?**
Regular informal interactions are being held with the consumers.

**SECRETARIAL AUDIT REPORT
FOR THE FINANCIAL YEAR ENDED 31 MARCH, 2022**

[Pursuant to section 204(1) of the Companies Act, 2013 and rule 9 of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014]

To
The Members,
MMTC Limited
Core-1 Scope Complex, 7 Institutional Area,
Lodhi Road, New Delhi-110003.

We have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by MMTC Limited (CIN L51909DL1963GOI004033) (hereinafter called the 'Company'). Secretarial Audit was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

- A. Based on our verification of the Company's books, papers, minute books, forms and returns filed and other records maintained by the company and also the information provided by the Company, its officers and authorized representatives during the conduct of secretarial audit, we hereby report that in our opinion, the company has, during the audit period covering the financial year ended on 31st March, 2022 (Audit Period) complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance-mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:
- B. We have examined the books, papers, minute books, forms and returns filed and other records maintained by the Company for the financial year ended on 31st March, 2022 according to the provisions of:
- The Companies Act, 2013 (the Act) and the rules made thereunder;
 - The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made there under;
 - The Depositories Act, 1996 and the Regulations and Bye-laws framed there under;
 - Foreign Exchange Management Act, 1999 and the rules and regulations made there under to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings, to the extent applicable;
 - The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act') to the extent applicable:
 - Securities and Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015;
 - Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements), Regulations 2018; (No such event during Audit Period);
 - Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
 - Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (No such event during Audit Period);
 - Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (No such event during Audit Period);
 - Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (No such event during Audit Period);
 - Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (No such event during Audit Period);
 - Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
 - Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 (No such event during Audit Period)



- j) The Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulation, 1993 regarding the Companies Act, 2013 and dealing with the client to the extent of securities issued;
- (vi) Guidelines on Corporate Governance for Central Public Sector Enterprises (CPSEs), 2010 issued by Department of Public Enterprises ('DPE Guidelines').
- (vii) We further report that, having regards to the compliance system prevailing in the Company, on examination of the relevant documents and records in pursuance thereof, on test check basis, the Company has generally complied with the specifically applicable laws to the Company as identified by the Management, including Income Tax Act, 1961, the Custom Act, 1962, etc., to the extent of their applicability to the Company.
- C. We have also examined compliance with the applicable clauses of the following:
- (i) Secretarial Standards with regard to Meetings of the Board of Directors (SS-1) and General Meetings (SS-2) issued by The Institute of Company Secretaries of India.
- (ii) Listing Agreements entered into by the Company with the National Stock Exchange of India Limited (NSE) and the BSE.
- D. During the period under review the Company has generally complied with the provisions of the Act, Rules, Regulations, Guidelines, Standards, etc. mentioned above subject to the following observations:
- (i) The composition of the Board was not in compliance with the provisions under Regulations 17(1)(b) of the SEBI (LODR) Regulations, 2015, as half of the Board does not comprise of Independent Directors on the Board during Audit period.
- (ii) Time gap between Risk Management Committee Meetings dated 31.03.2021 and 24.03.2022 is exceeding one hundred and eighty days as per Regulation 21(3C) of the Regulations. As informed by the management, the meeting of Risk Management Committee could not be convened within the stipulated time due to unavailability of members and chairman of the Committee.
- (iii) There was delay in submission of financial Results as per Regulation 33(3)(a) of the Regulations. Financial Results for the quarter ended 31.03.2021, 30.06.2021, 30.09.2021 and 31.12.2021 were submitted on 27.10.2021, 23.03.2022, 22.04.2022 and 05.05.2022 respectively. As informed by the management, the delay was caused due to various issues like strategic divestment of equity investment held by MMTC in Neelachal Ispat Nigam Limited (NINL) and the company had made waiver request to SEBI/Stock Exchanges.
- (iv) There was delay in submission of financial Results as per Regulation 33(3)(d) of the Regulations. Financial Results for the financial year 2020-21 were submitted on 27.10.2021. As informed by the management, the company had made waiver request to SEBI/Stock Exchanges.
- (v) As per the DPE Guidelines where Board of Directors is headed by an Executive Chairman, the number of Independent Directors shall be at least 50% of Board Members.
- As informed by the management, the Company is under administrative control of Ministry of Commerce & Industry, Government of India ('Administrative Ministry') and Directors are appointed by the Government of India. The Company has referred the matter to the Administrative Ministry for appointment of requisite number of Independent Directors.

We further report that

- I. The Board of Directors of the Company is duly constituted with proper balance of Executive Directors and Non-Executive Directors except as enumerated in para D above regarding the appointment for independent Directors. The changes in the composition of the Board of Directors that took place during the period under review were carried out in compliance with the provisions of the Act.
- II. Adequate notice is given to all Directors to schedule the Board Meetings, agenda and detailed notes on agenda were generally sent at least seven days in advance and a system exists for seeking and obtaining further information and clarifications on the agenda items before the meeting and for meaningful participation at the meeting.
- III. All decisions at Board Meetings and Committee Meetings are carried out by majority as recorded in the minutes of the meetings of the Board of Directors or Committee of the Board, as the case may be.

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

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

For VAP & Associates
Company Secretaries
FRN: S2014UP280200
Peer Review No: 1083/2021

Parul Jain
Proprietor
M. No. F8323 Place: Ghaziabad
CP No. 13901 Date: 09.09.2022
UDIN: F008323D000948196

**To
The Members,
MMTC Limited**

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

1. Maintenance of secretarial record is the responsibility of the management of the Company. Our responsibility is to express an opinion on these secretarial records based on our audit.
2. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial record. We believe that the process and practices, we followed provide a reasonable basis for our opinion.
3. The compliance of the provisions of corporate and other applicable laws, rules, regulations, standards is the responsibility of management. Our examination was limited to the verification of procedures on test check basis.
4. Our Audit examination is restricted only upto legal compliances of the applicable laws to be done by the Company, we have not checked the practical aspects relating to the same.
5. We have not verified the correctness and appropriateness of financial records and Books of Accounts of the company as well as correctness of the values and figures reported in various disclosures and returns as required to be submitted by the Company under the specified laws, though we have relied to a certain extent on the information furnished in such returns.
6. The compliance by the Company of applicable financial laws such as direct and indirect tax laws has not been reviewed in this Audit since the same have been subject to review by statutory auditors and other designated professionals and the contents of this Report has to be read in conjunction with and not in isolation of the observations, if any, in the report(s) furnished/to be furnished by any other auditor(s)/agencies/authorities with respect to the Company.
7. Wherever required, we have obtained the management representation about the compliance of laws, rules and regulations and happening of events, etc.
8. The Secretarial Audit Report is neither an assurance as to future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

**For VAP & Associates
Company Secretaries
FRN: S2014UP280200**

**Parul Jain
Proprietor
M. No. F8323
CP No. 13901**

Place: Ghaziabad
Date:09.09.2022



MANAGEMENT'S REPLY TO OBSERVATIONS OF SECRETARIAL AUDITOR IN THEIR REPORT FOR THE FINANCIAL YEAR 2021-22

AUDITORS' OBSERVATION	MANAGEMENT'S REPLY
(i) The composition of the Board was not in compliance with the provisions under Regulations 17(1)(b) of the SEBI (LODR) Regulations, 2015, as half of the Board does not comprise of Independent Directors on the Board during Audit period.	In accordance with the provisions of Articles of Association of MMTC Ltd. and the Company being a Central PSU, all the Directors on the Board of the company are appointed by the President of India through the administrative Ministry i.e. Ministry of Commerce & Industry, Govt of India. The matter regarding filling up the vacant positions of Independent Directors has been taken up with Department of Commerce, MOC&I. It is being pursued with the administrative Ministry regularly.
(ii) Time gap between Risk Management Committee Meetings dated 31.03.2021 and 24.03.2022 is exceeding one hundred and eighty days as per Regulation 21(3C) of the Regulations.	The Risk Management Committee during 2021-22 was headed by CMD (Addl. Charge). Meeting of this Committee could not be convened within the stipulated time due to unavailability of members & chairman of the Committee.
(iii) There was delay in submission of financial Results as per Regulation 33(3)(a) of the Regulations. Financial Results for the quarter ended 31.03.2021, 30.06.2021, 30.09.2021 and 31.12.2021 were submitted on 27.10.2021, 23.03.2022, 22.04.2022 and 05.05.2022 respectively.	The delay in submission of unaudited results for the quarter specified and also the annual audited results for 2020-21 was caused due to various issues like strategic divestment of equity investment held by MMTC in Neelachal Ispat Nigam Limited (NINL), long pending Anglo Coal legal dispute, etc which had major impact on the financials of the company. The company had made waiver requests to Stock Exchanges in this regard.
(iv) There was delay in submission of financial Results as per Regulation 33(3)(d) of the Regulations. Financial Results for the financial year 2020-21 were submitted on 27.10.2021.	
(v) As per the DPE Guidelines where Board of Directors is headed by an Executive Chairman, the number of Independent Directors shall be at least 50% of Board Members.	Reply as at (i) above.

Form No. AOC-2

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

Form for disclosure of particulars of contracts/arrangements entered into by the company with related parties referred to in sub-section (1) of section 188 of the Companies Act, 2013 including certain arms length transactions under third proviso thereto) during year 2021-22

Name of the Related Party	MMTC PAMP India Pvt Ltd	MMTC Transnational Pte. Ltd.	Neelachal Ispat Nigam Ltd
1. Details of contracts or arrangements or transactions not at arm's length basis			
a) Nature of the relationship	Joint Venture	Wholly Owned Foreign Subsidiary	Joint Venture
b) Nature of contracts/arrangements/s/transactions	Sale of bullion and minted products, refining and job work.	MTPL Singapore enters into sale/purchase agreement with MMTC lot-wise/shipment-wise wherein MTPL is the seller and MMTC is the buyer. Similarly, MTPL also participates in global tenders regularly alongwith other bidders wherein being a WOS of MMTC is exempted from giving EMD, Performance Guarantee Bond and KYC norms as applicable for other bidders.	Shareholders Agreement between MMTC & Govt. of Orissa through M/s. IPICOL by way of equity participation of MMTC upto 49.78% as a Managing Promoter. Also the Agreement for sale/purchase of finished goods AND procurement of raw-material was signed between MMTC & NINL vide agreement dtd. 06.08.1999 & amended subsequently on 22.06.2012.
c) Duration of contracts/arrangements/transactions	As per MOU	Ongoing basis as long as the requirement for buying and selling subsists.	Ongoing basis as long as the requirement for buying and selling subsists or till dis-investment of NINL whichever is earlier. After M/s. Tata Steel Long Products Limited (TSLP) was declared as H-1 bidder by DIPAM & TSLP accepted LOA during Feb.'2022, the sale/purchase on behalf of NINL ceased.



<p>d) Salient terms of the contracts of arrangements or transactions including the value if any</p>	<p>With regard to the most recent MOU signed with MPIPL, the salient terms are:</p> <ol style="list-style-type: none"> 1) MMTC may from time to time indicate its intent to purchase from existing MPIPL stocks at various locations across India Gold/Silver bullion Bars (Kilogram Bar of 995 Purity or 100 gm Gold Bar of 999 purity and silver bars of 0.999 fine purity) at applicable premium fixed by MPIPL for each location. 2) Duly authorised personnel of CBO MMTC . Corporate Office shall price all bullion with MPIPL pricing desk. The minimum fixing lot will be 1 kg for Gold Bars and 100 Kg for Silver Bars. 3) MPIPL may from time to time purchase gold/silver from MMTC. <p>Value-₹ 80.95 Cr.</p>	<p>As at (b) above.</p> <p>Value-₹ 0.91 Cr.</p>	<p>Agreement between MMTC & Govt. of Orissa through M/s. IPICOL envisaging that MMTC shall organize supply of raw materials and consumables for the plant on mutually agreed terms, domestic sale and export of products of the JV Company shall be arranged by MMTC at mutually agreed terms between MMTC & NINL. Agreement for sale/purchase of finished goods was signed between MMTC & NINL vide agreement dtd. 06.08.1999, subsequently got amended on 22.06.2012.</p> <p>Value of sale for finished goods/by products during FY 2021-22= Rs.232.36 cr.</p>
<p>e) Justification for entering into such contracts or arrangements or transactions</p>	<ol style="list-style-type: none"> 1) To improve margins and the topline. 2) Alternate supply source (LBMA accredited refinery thus meeting our quality requirements) of bullion bars in the domestic market particularly useful when the supply in the market from imports is restricted due to government policies. 	<p>Being the L1 bidder against the tenders floated by MMTC</p>	<p>As per the Shareholders Agreement signed between MMTC & Govt. of Odisha through IPICOL and details as enumerated above.</p>
<p>f) Dates of approval by Board</p>	<p>11.08.2021 / 07.01.2022</p>	<p>11.08.2021 / 07.01.2022</p>	<p>14.09.2020 & subsequently in view of ongoing divestment of NINL front ended by DIPAM under the aegis of Ministry of Finance, status note on NINL, sale of NINL's products and status of divestment of NINL was also apprised to Board of MMTC during FY 2021-22.</p>
<p>g) Amount paid/debited as advances if any</p>	<p>NIL</p>	<p>NIL</p>	<p>NIL</p>

2. Details of material contracts or arrangement or transactions at arm's length basis: As per MOU with MPIPL on arms length basis as mentioned above.

कार्यालय प्रधान निदेशक लेखापरीक्षा,
उद्योग एवं कॉर्पोरेट कार्य
ए.जी.सी.आर. भवन, आई.पी. एस्टेट,
नई दिल्ली-110 002



OFFICE OF THE PRINCIPAL DIRECTOR OF AUDIT,
INDUSTRY AND CORPORATE AFFAIRS
A.G.C.R. BUILDING, I.P. ESTATE,
NEW DELHI-110 002

संख्या: एएमजी-1/8(10)/ एम एम टी सी /
वार्षिक लेखा/ (2021-22)/2022-23/353-54
दिनांक: 13 SEP 2022

सेवा में

अध्यक्ष एवं प्रबंध निदेशक
एम एम टी सी लिमिटेड,
कोर - 1, स्कोप कॉम्प्लेक्स,
7, इंस्टीट्यूशनल एरिया, लोथी रोड,
नई दिल्ली - 110 003

विषय: कंपनी अधिनियम 2013 की धारा 143(6) (b) के अंतर्गत 31 मार्च 2022 को समाप्त वर्ष के लिए एम
एम टी सी लिमिटेड के वार्षिक लेखों पर भारत के नियंत्रक एवं महालेखापरीक्षक की टिप्पणियाँ।

महोदय,

कंपनी अधिनियम 2013 की धारा 143(6) (b) के अंतर्गत 31 मार्च 2022 को समाप्त वर्ष के लिए लिए
एम एम टी सी लिमिटेड के वार्षिक लेखों पर उपरोक्त विषय संबंधित संलग्न पत्र अंग्रेजित है।

भवदीया,

रुस. र. पंडा

(एस. आह्लादिनी पंडा)
प्रधान निदेशक लेखा परीक्षा
(उद्योग एवं कॉर्पोरेट कार्य)
नई दिल्ली

संलग्नक:- यथोपरि



**COMMENTS OF THE COMPTROLLER AND AUDITOR GENERAL OF INDIA
UNDER SECTION 143(6)(b) OF THE COMPANIES ACT, 2013 ON THE FINANCIAL
STATEMENTS OF MMTC LIMITED FOR THE YEAR ENDED 31 MARCH 2022**

The preparation of financial statements of MMTC Limited for the year ended 31 March 2022 in accordance with the financial reporting framework prescribed under the Companies Act, 2013 is the responsibility of the management of the Company. The Statutory Auditor appointed by the Comptroller and Auditor General of India under section 139(5) of the Act is responsible for expressing opinion on the financial statements under section 143 of the Act based on independent audit in accordance with the standards on auditing prescribed under section 143(10) of the Act. This is stated to have been done by them vide their Audit Report dated 08 July 2022.

I, on behalf of the Comptroller and Auditor General of India, have conducted a supplementary audit of the financial statements of MMTC Limited for the year ended 31 March 2022 under section 143(6)(a) of the Act. This supplementary audit has been carried out independently without access to the working papers of the statutory auditor and is limited primarily to inquiries of the statutory auditor and company personnel and a selective examination of some of the accounting records.

On the basis of my supplementary audit, nothing significant has come to my knowledge which would give rise to any comment upon or supplement to the statutory auditors' report under section 143(6)(b) of the Act.

**For and on behalf of
Comptroller & Auditor General of India**



**(S. Ahladini Panda)
Principal Director of Audit
(Industry & Corporate Affairs)
New Delhi**

Place: New Delhi

Date: 13 SEP 2022

DECADE AT A GLANCE

(₹ in crore)

Year Ended 31st March	2022	2021	2020	2019	2018	2017	2016	2015	2014	2013	2012
What we owe											
Equity Share capital	150	150	150	150	100	100	100	100	100	100	100
Other Equity	43	272	1034	1339	1349	1334	1278	1259	1242	1241	1321
	193	422	1184	1489	1449	1434	1378	1359	1342	1341	1421
Borrowings	2551	2364	3732	922	519	440	272	287	413	1478	3430
Other Long Term Liabilities	4	4	6	-	-	-	19	20	10	19	5
Long Term Provisions	38	44	45	189	184	188	179	177	183	170	137
	2786	2834	4967	2600	2152	2062	1847	1843	1947	3008	4993
What we own											
Fixed assets	71	71	72	67	65	65	209	206	212	211	205
Less: depreciation	37	33	29	22	17	12	152	148	130	119	108
Net fixed assets	34	38	43	45	48	52	58	58	82	92	97
Investment Property	4	4	4	4	4	4	-	-	-	-	-
Investments	32	23	22	452	453	485	460	446	446	470	467
Assets held for sale	459	467	467	-	-	-	-	-	-	-	-
Other Non Current Assets including Financial Assets	72	75	78	74	94	219	146	134	78	115	112
Working capital	1971	1672	4122	1794	1317	1070	955	977	1115	2187	4245
Deferred Tax Assets	214	555	231	231	236	233	229	228	226	145	72
	2786	2834	4967	2600	2152	2062	1847	1843	1947	3008	4993
What we earned											
Sales	7841	26365	24056	28293	15757	11593	12460	18242	25075	28416	65929
Exports	34	1805	1802	1104	1795	1580	673	2301	4127	2980	2045
Imports	7071	20697	19074	21625	11878	8480	10296	14530	18714	20954	61042
Domestic	736	3863	3180	5564	2084	1533	1492	1411	2234	4482	2842
Interest earned	4	5	11	4	17	28	125	100	138	280	646
Other income	603	54	100	701	740	130	71	68	280	221	477
	8448	26424	24167	28998	16514	11751	12656	18409	25492	28916	67052
What we spent											
Cost of sales	7800	26269	23961	28506	16118	11489	12374	18076	24924	28299	66048
Establishment Expenses	114	135	194	221	259	196	202	192	190	203	184
Administration Expenses	46	28	56	55	48	52	53	51	47	48	52
Finance Cost (incl. Interest paid)	206	198	139	65	17	21	30	17	67	220	576
Depreciation & Amortization	5	5	6	6	5	7	5	18	12	12	12
Debts/claims/assets written off/withdrawn	-	6	-	1	0	1	0	30	1	0	0
Allowance for Bad and Doubtful Debts / claims/ advances	1	1	1	16	-	1	0	1	1	6	13
Extra-ordinary items	-	-	-	-	-	-	-	210	244	100	-
Exceptional items *	155	876	37	9	8	(96)	(66)	(37)	23	13	(0)
	8327	27518	24394	28879	16455	11669	12597	18348	25476	29045	66987



(₹ in crore)

Year Ended 31st March	2022	2021	2020	2019	2018	2017	2016	2015	2014	2013	2012
What we saved											
Profit for the year	121	(1094)	(227)	119	59	81	59	62	16	(128)	65
Provision for taxation	363	(324)	-	37	10	24	3	12	(4)	(57)	5
Profit after tax (before Prior Period Adj.)	(242)	(770)	(227)	82	49	57	56	50	20	(71)	60
Prior period adjustment	-	-	-	-	-	-	1	2	2	(1)	(11)
Profit available for appropriation	(242)	(770)	(227)	82	49	57	55	48	19	(71)	71
Dividend	-	-	45	30	30	30	30	25	15	10	25
Tax on dividend	-	-	9	6	6	6	6	5	3	0	4
Retained earnings	(242)	(770)	(281)	46	13	21	19	18	1	(81)	42
Gross Profit	593	113	174	474	333	220	130	208	346	300	277
Profit before Tax	121	(1094)	(227)	119	59	81	58	60	14	(128)	76
Profit after tax	(242)	(770)	(227)	82	49	57	55	48	19	(71)	71
Net worth	193	422	1184	1489	1449	1434	1378	1359	1342	1341	1421
Capital employed	546	654	433	917	846	682	740	748	784	800	913
Working capital	1971	1672	4122	1794	1317	1070	955	977	1115	2187	4245
Ratios											
Overheads to sales %	2.04	0.62	1.04	0.98	1.95	2.14	2.04	1.33	0.94	0.88	0.36
Stocks to sales %	0.38	0.17	0.91	0.99	10.86	20.42	3.22	1.75	1.23	3.13	1.40
Trading profit to sales%	7.56	0.43	0.72	1.68	2.11	1.90	1.04	1.14	1.38	1.05	0.42
Profit before tax to sales %	1.54	(4.15)	(0.94)	0.42	0.37	0.70	0.46	0.33	0.06	(0.45)	0.12
Profit after tax to sales %	(3.09)	(2.92)	(0.94)	0.29	0.31	0.49	0.44	0.26	0.07	(0.25)	0.11
Debtors to sales %	1.72	2.11	8.00	0.98	2.24	4.36	6.64	16.64	6.92	7.83	4.20
Working capital to sales %	25.14	6.34	17.14	6.34	8.36	9.23	7.66	5.36	4.45	7.69	6.44
Sales to working capital (times)	3.98	15.77	5.84	15.77	11.96	10.84	13.05	18.67	22.48	13.00	15.53
Profit for the year to capital employed %	(22.16)	167.28	(52.42)	12.98	6.97	11.90	7.90	8.23	2.04	(16.04)	7.13
Profit after tax to capital employed %	44.32	117.74	(52.42)	8.94	5.79	8.36	7.42	6.41	2.37	(8.82)	7.75
Profit for the year to net worth %	62.69	(259.24)	(19.17)	7.99	4.07	5.66	4.25	4.53	1.19	(9.58)	4.58
Profit after tax to net worth%	(125.39)	(182.46)	(19.17)	5.51	3.38	3.97	3.98	3.53	1.39	(5.27)	4.97
Number of employees	597	702	786	943	1117	1226	1334	1439	1530	1605	1673
Sales per employee	13.13	37.56	30.61	30.00	14.11	9.46	9.34	12.68	16.39	17.70	39.41

* Exceptional Items for Year 2022, 2021, 2020, 2019, 2018, 2017, 2016 & 2015 excludes Write-down of inventories to net realisable value.

SOURCES AND UTILISATION OF FUNDS

(₹ in crore)

	2021-22	2020-21	2019-20
SOURCES			
Internal generation			
Profit after tax	(242)	(770)	(227)
Deferred Tax Adjustments	363	(325)	0
Depreciation	38	34	30
Provisions	707	707	708
Equity	150	150	150
Reserves	285	1042	1261
External generation			
Banks	2551	2364	3732
Current liabilities	874	1746	1561
Other liabilities	1144	974	103
TOTAL SOURCES	5870	5922	7318
UTILISATION			
Fixed assets	75	75	77
Investments	540	540	540
Trade debts	525	946	2314
Inventories	30	46	218
Loan & advances	4062	3919	3818
Cash & bank balance	61	166	120
Deferred Tax	577	230	231
TOTAL UTILISATION	5870	5922	7318



STATEMENT OF CHANGES IN FINANCIAL POSITION

(₹ in crore)

SOURCES OF FUNDS	2021-22		2020-21		2019-20	
Internal generation						
Profit after tax	(242)		(770)		(227)	
Depreciation	5	(237)	5	(765)	6	(221)
Deferred Tax Adjustment		555		231		231
Borrowings						
Loan funds		187		(1,368)		2,810
TOTAL SOURCES		505		(1,902)		2,820
APPLICATION OF FUNDS						
Fixed assets		-		-		6
Investments		1		1		37
Deferred Tax Asset		214		555		231
Final Dividend		-		-		45
Dividend Tax		-		-		9
Inventory		(16)		(172)		(62)
Trade Receivables		(421)		(1,370)		1,648
Loan & Other Assets		142		103		440
Cash & Bank balance		(105)		46		65
Liabilities		851		(183)		238
Provisions		(161)		(882)		163
TOTAL APPLICATION OF FUNDS		505		(1,902)		2,820

VALUE ADDED STATEMENT

(₹ in crore)

	2021-22		2020-21		2019-20	
VALUE ADDED						
Sales & other trade earning	8,393		26,382		24,135	
Add: Other income	73		37		25	
	8467		26419		24160	
Less: Cost of material and services used	7,404		25,186		23,295	
TOTAL VALUE ADDITION	1063		1233		865	
VALUE DISTRIBUTION						
Operating expenses	396	37.26	1,081	87.70	659	76.18
Employment costs	114	10.77	135	10.95	194	22.48
Administrative costs	225	21.13	912	73.94	105	12.14
Provisions	1	0.10	1	0.09	0	0.06
Depreciation	5	0.43	5	0.40	6	0.65
Interest(net)	202	18.97	193	15.68	128	14.76
Income tax	363	34.11	(325)	(26.32)	-	0.00
Retained earning	(242)	(22.76)	(770)	(62.43)	(227)	(26.26)
TOTAL VALUE DISTRIBUTION	1,063	100	1,233	100	865	100
ANALYSIS						
Number of employee	597		702		786	
Value added per employee	1.78		1.76		1.10	
Net worth	193		422		1,184	
Value added per rupee of net worth	5.51		2.92		0.73	



COMMODITY - WISE PERFORMANCE

(₹ in crore)

Yearended 31st March	2022	2021	2020	2019	2018	2017	2016	2015	2014	2013	2012
EXPORTS											
Iron Ore	-	1792	1602	564	1091	923	361	1,401	1,670	989	305
Manganese ore/oxide	25	5	9	10	-	-	-	7	14	23	34
Chrome ore/concentrate	-	-	74	126	191	350	82	34	353	378	616
Pig iron	-	-	110	375	401	242	230	629	1,099	289	940
Slag	-	-	-	8	1	-	-	-	2	-	-
Fertilizer	-	-	-	-	-	-	-	-	235	153	149
Agro Products	-	-	-	-	-	-	-	229	754	1,148	-
Raw Wool	-	-	-	-	-	-	-	-	-	-	1
Merchanting Trade	-	-	-	-	61	21	-	-	-	-	-
General Trade	9	8	7	21	50	45	-	-	-	-	-
Total Exports	34	1805	1802	1104	1795	1580	673	2301	4127	2980	2045
IMPORTS											
Metals/IRM											
Copper/Copper Cathodes	-	-	-	-	1	166	-	-	-	10	133
Zinc	12	-	95	136	147	-	101	56	62	84	138
Lead	-	73	1	0	0	-	0	3	2	5	4
Tin	-	-	8	8	45	39	18	20	39	42	67
Nickel	-	-	32	23	26	58	18	72	75	57	139
Aluminium	-	-	-	-	-	-	-	-	-	-	-
Antimony Metal	-	-	-	-	1	4	4	5	7	6	-
Steel /Steel Scrap/HR Coils	-	-	-	-	-	-	-	-	-	-	48
Others	-	-	21	25	26	10	-	-	-	11	58
SUB TOTAL	12	73	157	192	246	278	141	156	185	214	587
Fertilizers:											
Sulphur	-	6	6	17	14	6	16	23	23	23	22
Urea	1454	9180	11091	10111	1823	2,418	2,611	7,797	3,597	1,170	4,893
DAP	-	-	-	-	-	-	-	-	-	-	145
MOP	-	-	-	-	-	158	-	176	128	560	528
Phosphoric Acid	-	-	-	-	-	46	-	-	-	-	-
Others	-	-	-	-	1	24	97	-	-	-	-
SUB TOTAL	1454	9186	11097	10128	1838	2652	2725	7996	3747	1754	5587
Diamonds/Gold/Emeralds	5580	11364	7072	9581	8939	4,874	6,342	4,334	8,412	13,137	50,461
Agro Products	-	-	96	610	529	106	58	70	1,214	1,378	1,184
Hydrocarbons	2	74	646	1097	323	570	1,013	1,948	5,151	4,469	3,220
Others	23	-	5	17	3	-	17	26	5	3	3
TOTAL IMPORTS	7071	20697	19073	21625	11878	8480	10296	14530	18713	20955	61042
DOMESTIC											
Copper/Zinc/Brass/Alum.	1	1	5	1	-	-	0	-	-	-	-
Pig Iron/Slag/Steel	18	1	558	1488	417	174	187	176	234	980	827
Fertilizers	-	-	3	5	2	0	160	86	5	8	9
Agro Products	73	644	660	370	20	103	298	-	502	1,604	846
Gems & Jewellery/Silver	433	2701	1232	3206	1168	1,165	708	812	761	538	682
Hydrocarbon	201	510	692	356	439	69	114	176	446	1,166	348
Others	10	6	31	138	38	22	24	161	287	186	130
TOTAL DOMESTIC	736	3863	3181	5564	2084	1533	1492	1411	2234	4482	2842
TOTAL TURNOVER	7841	26365	24056	28293	15757	11593	12460	18242	25075	28416	65929

COUNTRY-WISE EXPORTS

(₹ in crore)

Year ended 31st March	2022	2021	2020
ASIA			
CHINA	9	8	85
HONGKONG	20	5	-
JAPAN	-	1393	1252
KOREA	-	399	350
NEPAL	-	-	1
INDONESIA	5	-	5
SINGAPORE	-	-	109
TOTAL EXPORTS	34	1805	1802



COUNTRY-WISE IMPORTS

(₹ in crore)

Year ended 31st March	2022	2021	2020
AFRICA			
EGYPT	253	1113	904
ALGERIA	-	-	105
SOUTH AFRICA	43	83	-
	296	1,196	1,009
ASIA			
CHINA	155	3207	4238
VIETNAM	-	98	91
INDONESIA	6	424	1109
JAPAN	-	-	7
KOREA	-	2	1
MALAYSIA	-	94	-
SOUTH KOREA	3	-	-
RUSSIA	33	249	665
SINGAPORE	-	-	55
	197	4074	6166
EAST EUROPE			
KAZAKHISTAN	4	-	21
UZBEKISTAN	-	-	45
UKRAINE	289	1110	719
	293	1110	785
MIDDLE EAST			
BAHRAIN	126	336	536
DUBAI	-	-	46
IRAN	-	-	-
OMAN	505	1278	1371
QATAR	-	83	343
SAUDI ARABIA	-	-	191
TURKEY	-	4642	128
UAE	2346	-	1244
	2977	6339	3859
NORTH AMERICA			
USA	-	5	11
	-	5	11
SOUTH AMERICA			
BRAZIL	-	1	-
	-	1	-
OCEANIA			
AUSTRALIA	5	94	870
	5	94	870
WEST EUROPE			
FINLAND	-	204	199
NETHERLANDS	-	6	7
LATIVA	-	-	104
SWITZERLAND	2344	4844	3396
NORWAY	-	-	21
UK	556	1667	1956
ITALY	18	11	-
	2918	6732	5683
TOTAL IMPORTS	6686	19551	18383

CONTRIBUTION TO EXCHEQUER

(₹ in crore)

	2021-22	2020-21	2019-20
<u>To Central Government</u>			
Export Duty	-	182	179
Import Duty	388	1,073	569
GST	64	163	239
Income Tax (Incl. Tax on Dividend)/TDS	7	21	46
Dividend	2	-	40
Total	461	1,439	1,073
<u>To Railways & Ports</u>			
Railway freight	-	-	1
Plot rent to Railways/Ports	-	3	-
Port Charges	-	-	8
Total	-	3	9
To State Government			
GST	53	143	66
Total	53	143	66
Grand Total	514	1,585	1,148



PERFORMANCE AT A GLANCE

(₹ in crore)

For the financial year ending 31st March	2022	2021	2020
Total Sales	7841	26365	24056
which includes :-			
Exports	34	1805	1802
Imports	7071	20697	19074
Domestic	736	3863	3180
Trading Profit	593	113	174
Income from Other Sources	78	43	36
Profit After Tax	(242)	(770)	(227)
At Year End			
Total Assets	4763	5507	6580
Share Capital	150	150	150
Net Worth	193	422	1184
Per Share (Rupees)			
Earnings	(161)	(5.13)	(1.51)
Dividend	-	-	-
Net Worth to Share Capital (times)	1.29	2.81	7.89
Profit after Tax to Capital Employed (%)	44.32	117.74	(52.42)
Profit after Tax to Net Worth (%)	(125.39)	(182.46)	(19.17)
Sales per Employee (Rs.)	13.13	37.56	30.61

INDEPENDENT AUDITOR'S REPORT

To the Members of MMTC Limited

Report on the Audit of the Standalone Financial Statements

Qualified Opinion

We have audited the accompanying financial statements of MMTC Limited ("the Company"), which comprise the Balance Sheet as at March 31, 2022, the Statement of Profit and Loss (including Other Comprehensive Income), the Statement of Changes in Equity and the Statement of Cash Flows for the year ended on that date, and notes to the financial statements including a summary of the significant accounting policies and other explanatory information (hereinafter referred to as "the financial statements"), in which are incorporated the financial statements for the year ended on that date audited by the Branch Auditors of the Company's Regional and sub-regional Offices at Mumbai, Vizag, Chennai, Hyderabad and Bhubaneshwar(SRO).

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 Companies Act, 2013 ("the Act") in the manner so required and give a true and fair view in conformity with the Indian Accounting Standards prescribed under section 133 of the Act read with the Companies (Indian Accounting Standards) Rules, 2021, as amended, thereof ("Ind AS") and other accounting principle generally accepted in India, of the state of affairs of the Company as at March 31, 2022, the losses and total comprehensive income (Comprising of net loss and total comprehensive loss), changes in equity and its cash flows for the year ended on that date.

Basis for Qualified Opinion

1. We draw attention to note no 17 of the accompanying financial statement, which states that the quarterly returns or statements of current assets are filed by the company with banks on the basis of provisional monthly information statement prepared for internal purposes. As per Notification of Ministry of Corporate affairs ("MCA") dated 24 March 2021, in regards with amendments to schedule III of the Act the Company is required to disclose the quarterly reconciliation of statements in agreement with the books. As informed by the management given the volume and nature of business the reconciliation of these statements could not be performed and material discrepancy if any could not be determined. Thus, the required disclosure has not been presented in the financial statement.
2. We draw attention to note no 36(k) of the accompanying financial statement, which states that there are several provisions for doubtful recoverable amounting to INR 1.13 crore, the recoverability assessment of these balances could not be performed due to non-availability of sufficient information. The company has initiated an internal note to prepare a guideline to assess the recoverability of such balances. As per the management these provisions made relates to balances outstanding for a significant period of time and no sufficient evidence is available for recovery of these accounts, but due to non-availability of any internal guidelines these provisions have not been written off. Accordingly, the provisions and respective recoverable balances would have been reduced by INR. 1.13 crore.
3. We draw attention to note no 40(f)(a) of the accompanying financial statement, which states that the liability @1.5% of profit before tax ("PBT") for the year in respect of scheme for retirees prior to 01.01.2007 (closed group) has not been recognised even though the Company has reported PBT of INR. 120.60crore, on the basis of affordability. Also, the Company has not provided form PRMBS (open group) @ 4.5% of Basic and DA for serving employees. During the year provision in respect of retirees after 01.01.2007 pertaining to FY 2019-20 and 2020-21 has been withdrawn due to loss during these previous years. The management will review the above in the next financial year. The non-recognition of provision according to the schemes above constitutes a departure from the accounting standards as prescribed under section 133 of the Act. An amount of INR. 1.81crore (1.5% of PBT) and INR. 3.29 crore (4.5% of Basic and DA) estimated by the management, should have been provided as per the accounting standards. Accordingly, the provision for PRMBS would have been increased by INR. 5.10crore and net income and shareholders' fund would have been reduced by the given amount.

We conducted our audit of the financial statements in accordance with the Standards on Auditing specified under section 143(10) of the Act (SAs). Our responsibilities under those Standards are further described in the Auditor's 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 (ICAI) together with the ethical requirements that are relevant to our audit of the financial statements under the provisions of the Act and the Rules made thereunder, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the ICAI's Code of Ethics.

We believe that the audit evidence obtained by us is sufficient and appropriate to provide a basis for our audit opinion on the financial statements.

Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the standalone financial statements of the current period. These matters were addressed in the context of our audit of the standalone financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters. For each matter below, our description of how our audit addressed the matter is provided in that context.

We have determined the matters described below to be the key audit matters to be communicated in our report. We have fulfilled the responsibilities described in the Auditor's responsibilities for the audit of the standalone Ind AS



financial statements section of our report, including in relation to these matters. Accordingly, our audit included the performance of procedures designed to respond to our assessment of the risks of material misstatement of the standalone Ind AS financial statements. The results of our audit procedures, including the procedures performed to address the matters below, provide the basis for our audit opinion on the accompanying standalone Ind AS financial statements.

Sr. No.	Key Audit Matter	Auditor's Response
1.	<p>Refer note no. 34 on the claims not acknowledged as debt incorporating therein claims on account of pending legal cases. There are large numbers of cases pending before various adjudicating authorities. These legal cases involve significant judgement to determine the possible outcome of those disputes and independent legal assessment to pursue the case.</p> <p>The company has 5 regional offices, 1 sub-regional office and different divisions to handle the trade activities including accounting of that particular activity. However, in lot of cases, the legal cases are pursued at corporate office level while related financial information/transactions are dealt at RO level, thereby difficulties are faced in giving a comprehensive and holistic treatment to the transaction.</p>	<p>We obtained list of all the pending legal cases handled at Corporate office legal division on 31st March 2022 with a note from management on the changes in the status of the cases from that of last year. We considered the effect of information provided by the management and analysed the impact of financial obligation of the Company.</p> <p>It was suggested to management to have legal cases and financial obligation if any at the same location in order to have clarity in reporting in financial statement.</p>
2.	<p>Refer note no. 11 include advance to related parties wherein interest income on loan/advance given to NINL been recognized as an income during the year.</p>	<p>In view of the significance of the matter, we applied following audit procedures in this area, among others to obtain sufficient appropriate evidence.</p> <p>We discussed the matter with the management to understand the possibility of recovery of interest</p> <p>Considered the appropriateness of Company's revenue recognition policy and its compliance in terms of INDAS 115 Revenue recognition.</p> <p>Assessed the relevant disclosures made in the financial statements.</p>
3.	<p>Assessment of impairment of investment in subsidiary and joint ventures (Refer note no. 6) The company as at 31st March 2022 has non-current and current investments.</p>	<p>Our audit procedures include but we are not limited to the following:</p> <p>Obtained and understanding of the management process.</p> <p>Discussed extensively with management regarding impairment indicators and evaluated the design and testing operating effectiveness of controls.</p> <p>Assessed the methodology used by the management to estimate the recoverability of investment and ensured that it is consistent with applicable accounting standards.</p>
4.	<p>Refer Note No 32 (ii) on provision on Anglo Coal</p>	<p>In view of the significance of the matter, we applied following audit procedures:</p> <p>Obtained and understanding of relevant documents in relation to the matters of anglo coal.</p> <p>Discussed with management regarding the possible impact and shown in the financial statement.</p>

Emphasis of Matters

Restructuring and default in loan repayment

We draw attention to Note No. 17 of the accompanying financial Statements, which states that the Company had requested all lender banks for restructuring of loan in terms of RBI Circular no. RBI/2020-21/16 DOR No.BP/BC/3/21.04.048/2020-21 dated 06.08.2020 for resolution of Covid-19 related stress, the loan was further restructured as on 08.06.2021 wherein the due date of loan and interest repayment was 30.03.2022 with a review period of 30 days. Total outstanding bank loan and interest was to be paid in one go on or before 29.04.2022 (30 days review period after 30.03.2022), mainly out of NINL divestment. As bank loan along with interest could not be repaid on due date/ review period due to non-receipt of disinvestment proceeds of NINL, MMTC account with all lender banks has been downgraded to Sub-standard/ NPA w.e.f. 08.06.2021 ie. the date of loan restructuring. Penal provisions were applicable as per loan restructuring agreements and other legislations and penal/card rate of interest was to be charged on default amount. Consequent upon receipts of divestment proceeds from NINL on 4.7.2022 an amount of INR. 2551.44 crore as on 31.3.2022 have been paid towards principal and normal agreed interest upto 31.3.2022. Further as on 6.7.2022 statement have been obtained and lenders have provided statement with only penal interest form 1.4.2022 till date of payment of complete loan balances. The Company has taken up with the lenders, during Joint lenders meet "JLM" held on 07.07.2022 to waive off all the penal and other charges including penal/card rate charges prior to 01.04.2022 if any.

Our opinion is not modified in respect of the above matter.

Non-compliance of regulation 33 of SEBI

We draw attention to Note No. 34 (vii) to the accompanying financial statements, which states that the Company has created a contingent liability of INR 0.07 crore on account of demand raised by Stock Exchange Board of India (SEBI) in relation to non-compliance of regulation 33 of SEBI. The management is in the process of having these demands waived and thus no provision has been made in the financial statements

Our opinion is not modified in respect of the above matter.

Other Matters

1. We did not audit the financial statements/ financial information of 5 Regional Offices included in the standalone financial statements of the Company whose financial statements/financial information reflect total assets of INR. 3895.08 crore as at March 31, 2022 and total revenue of INR.6598.16 crore for the year ended on that date, as considered in the standalone financial statements. The financial statements/financial information of these branches have been audited by the branch auditors whose reports have been furnished to us, and our opinion in so far as it relates to the amounts and disclosures included in respect of these branches, is based solely on the report of such branch auditors.
2. The regional office of Hyderabad has reported that the company has obtained substantial balance confirmations towards advances from various customers outstanding as at the balance sheet date classified under other liabilities, other than the very old balances of Rs 4.45 crore for which a write back proposal has been sent to head office during the year under audit.

Our opinion is not modified in respect of this matter.

Management's Responsibilities for the Financial Statements

The Company's Board of Directors is responsible for the matters stated in section 134(5) of the Act with respect to the preparation of these financial statements that give a true and fair view of the financial position, financial performance, total comprehensive income, changes in equity and cash flows of the Company in accordance with the Ind AS and other accounting principles generally accepted in India. This responsibility also includes maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding the assets of the Company and for preventing and detecting frauds and other irregularities; selection and application of appropriate accounting policies; making judgments and estimates that are reasonable and prudent; and design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the 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.

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

Auditor's Responsibilities for the Audit of the Financial Statements

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

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



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

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

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

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

Report on Other Legal and Regulatory Requirements

1. As required by the Companies (Auditor's Report) Order, 2020 ("the Order") issued by the Central Government in terms of Section 143(11) of the Act, we give in "**Annexure A**" a statement on the matters specified in paragraphs 3 and 4 of the Order.
2. As required by Section 143(3) of the Act, based on our audit we report that:
 - a) We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purposes of our audit of the aforesaid financial statements.
 - b) In our opinion, proper books of account as required by law have been kept by the Company so far as it appears from our examination of those books;
 - c) The Balance Sheet, the Statement of Profit and Loss, the Cash Flow Statement and Statement of Changes in Equity dealt with by this report are in agreement with the books of account;
 - d) In our opinion, the aforesaid financial statements comply with the Ind AS specified under Section 133 of the Act, read with the companies (Indian accounting Standards) Rules, 2015 as amended;
 - e) Being a Government Company pursuant to the Notification No. GSR 463(E) dated 5 June 2015 issued by the Ministry of Corporate Affairs, Government of India, provisions of sub-section (2) of Section 164 of the Act, are not applicable to the Company;
 - f) With respect to the adequacy of the internal financial controls over financial reporting of the Company and the operating effectiveness of such controls, refer to our separate Report in "**Annexure B**".
 - g) As per Notification number G.S.R. 463 (E) dated 5th June, 2015 issued by Ministry of Corporate Affairs, section 197 of the Act regarding remuneration to director is not applicable to the Company, since it is a Government Company.
 - h) With respect to the other matters to be included in the Auditor's Report in accordance with Rule 11 of the Companies (Audit and Auditors) Rules, 2014, as amended in our opinion and to the best of our information and according to the explanations given to us:
 - i. There are pending litigation including matters relating to sales tax, custom duty and excise duty which are disclosed as contingent liability – refer to Note 34 and 36 to the standalone financial statements, the impact of the same is unascertainable as the matters are sub-judice.
 - ii. The Company is not having any long-term contracts including derivative contracts for which there were any material foreseeable losses; and

- iii. The Company has not transferred INR. 127 to the Investor education and protection fund.
- iv. (a) The Management has represented that, to the best of its knowledge and belief, no funds (which are material either individually or in the aggregate) have been advanced or loaned or invested (either from borrowed funds or share premium or any other sources or kind of funds) by the Company to or in any other person or entity, including foreign entity ("Intermediaries"), with the understanding, whether recorded in writing or otherwise, that the Intermediary shall, whether, directly or indirectly lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the Company ("Ultimate Beneficiaries") or provide any guarantee, security or the like on behalf of the Ultimate Beneficiaries (Refer note 48 (e)).
- (b) The Management has represented, that, to the best of its knowledge and belief, no funds (which are material either individually or in the aggregate) have been received by the Company from any person or entity, including foreign entity ("Funding Parties"), with the understanding, whether recorded in writing or otherwise, that the Company shall, whether, directly or indirectly, lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the Funding Party ("Ultimate Beneficiaries") or provide any guarantee, security or the like on behalf of the Ultimate Beneficiaries (Refer note 48(f))
- (c) Based on the audit procedures that have been considered reasonable and appropriate in the circumstances, nothing has come to our notice that has caused us to believe that the representations under sub-clause (i) and (ii) of Rule 11(e), as provided under (a) and (b) above, contain any material misstatement.
- v. The Company has not declared or paid any dividend during the year ended 31 March 2022.
3. As required by CAG of India through directions, issued under Section 143 (5) of the Act, 2013 we give our report in the attached "Annexure C".

For M. L. Puri & Co.
Chartered Accountants
F.R. No.: 00002312N

Place: New Delhi
Date: 08.07.2022
UDIN: 22095584AMPTHP6700

(CA. R C Gupta)
Partner
M. No. 095584



Annexure-A To the Independent Auditor's Report on the Financial Statements of The MMTCL LIMITED.

Refer to in Paragraph 4 under "Other Legal and Regulatory Requirement" we further report that:

- i.
- a.
 - i. The Company has maintained proper records in respect of its property plant and equipment showing full particulars including quantitative details and situation of Property plant and equipment.
 - ii. The Company has maintained proper records showing full particulars of intangible assets.
- b. As per the explanations and information given to us the Property plant and equipment have been physically verified by the management at reasonable intervals except fixed assets provided to officials of Ministry of Corporate Affairs.
- c. Based on our examination of the property tax receipts and lease agreement for land on which building is constructed, registered sale deed/transfer deed/conveyance deed provided to us, we report that. The title in respect of self-constructed buildings and title deeds of all other immovable properties (other than properties where the Company is the lessee and the lease agreements are duly executed in favour of the lessee), disclosed in the financial statements included under Property, Plant and Equipment are held in the name of the Company as at the balance sheet date.

Title deeds of immovable property are held in the name of the company except in the case mentioned

Region/Office	Description of property	Gross carrying Value (INR)	Held in the name of	Whether promoter, director or their relative or employee	Period held	Remarks
Corporate Office	Leasehold Land (Scope) Office Building (Scope)	1.04 Crore 5.74 Crore	Scope Complex	No	99 years	Lease Deed is in the name of scope which is yet to be executed in favour of the company

Further, 36 title deeds has been deposited with the Hon'ble High Court in respect of the dispute with Anglo American Metallurgical Coal Pte Limited.

- d. The Company has not revalued any of its Property, Plant and Equipment (including right-of-use assets) and intangible assets during the year.
- e. No proceedings have been initiated during the year or are pending against the Company as at March 31, 2022 for holding any benami property under the Benami Transactions (Prohibition) Act, 1988 (as amended in 2016) and rules made thereunder.
- ii.
 - a. The management has conducted physical verification of inventory at reasonable intervals during the year. In our opinion, the coverage and procedure of such verification by the management is appropriate and no discrepancies of 10% or more in the aggregate for each class of inventory were noticed. In our opinion and according to the information and explanation given to us, the procedure of physical verification of inventories followed by the management needs to be strengthened in relation to the size of the MMTCL Limited and the nature of its business.
 - b. The Company has been sanctioned working capital limits in excess of five crore rupee, in aggregate, from banks or financial institutions on the basis of security of current assets; we are not in a position to comment on the reconciliation of quarterly statement with the books of accounts as the Company has not provided the information.
- iii. The Company has not made any investments in, has provided any loans or advances in the nature of loans or stood guarantee, or provided security, secured or unsecured, to companies, firms, Limited liability partnerships or any other parties during the year, and hence reporting under clause 3(iii) of the Order is not applicable.
- iv. In our opinion and according to the information and explanations given to us the Company has complied with the provisions of Section 186 of the Act with respect to investments. Further, in our opinion, the Company has not entered into any transaction covered under Sections 185 and 186 of the Act in respect of loans, guarantees and security.
- v. According to the information and explanations given to us, the Company has not accepted any deposits or there is

- no amount which has been considered as deemed deposit within the meaning of sections 73 to 76 of the Act and the Companies (Acceptance of Deposits) Rules, 2014 (as amended). Accordingly, reporting under clause 3(v) of the Order is not applicable to the Company.
- vi. According to the information and explanations given to us, maintenance of cost records has not been prescribed by the Central government for the Company under section 148(1) of the act. Accordingly, the provisions of clause 3(vi) of the Order are not applicable.
 - vii.
 - a. According to the information and explanations given to us and as per the records verified by us, the Company has not been regular in depositing undisputed statutory dues including Income Tax, Provident Fund dues, Professional Tax, Value Added Tax and Service Tax with the appropriate authorities. There were no undisputed amount payable in respect of Income Tax, Provident Fund dues, Professional Tax, GST, Value Added Tax and Service Tax and other statutory dues in arrear as at 31st March 2022 for more than six months from the date they became payable.
 - b. In case of dues of Income Tax or sales tax or service tax or duty of custom or duty of excise or value added tax or cess which have not been deposited on account of any dispute are attached as **"Annexure I"**.
 - viii. There were no transactions relating to previously unrecorded income that have been surrendered or disclosed as income during the year in the tax assessments under the Income Tax Act, 1961 (43 of 1961).
 - ix.
 - a. According to the information and explanations given to us and as per the records verified by us, the Company has defaulted in repayment of loans or borrowings to a financial institution, bank, Government or dues to debenture holders as per details attached in **"Annexure II"**.
 - b. According to the information and explanations given to us including representation received from the management of the Company, and on the basis of our audit procedures, we report that the Company has not been declared a wilful defaulter by any bank or financial institution or other lender.
 - c. In our opinion and according to the information and explanations given to us, the term loans were applied for the purpose for which the loans were obtained.
 - d. In our opinion and according to the information and explanations given to us, the Company has not raised any funds on short-term basis during the year. The outstanding short-term funds have not been utilised for the long-term purpose.
 - e. According to the information and explanations given to us and on an overall examination of the financial statements of the Company, the Company has not taken any funds from any entity or person on account of or to meet the obligations of its subsidiary.
 - f. According to the information and explanations given to us, the Company has not raised any loans during the year on the pledge of securities held in its subsidiaries.
 - x.
 - a. The Company has not raised any money by way of initial public offer or further public offer (including debt instruments), during the year. Accordingly, reporting under clause 3(x)(a) of the Order is not applicable.
 - b. According to the information and explanations given to us, the Company has not made any preferential allotment or private placement of shares or (fully, partially or optionally) convertible debentures during the year. Accordingly, reporting under clause 3(x)(b) of the Order is not applicable to the Company.
 - xi.
 - a. No fraud by the Company or on the Company has been noticed or reported during the year. According to the information and explanations given to us and based on the audit procedures performed in accordance with the generally accepted auditing practices in India, we have neither come across any instance of fraud on or by the company or its officers, noticed or reported during the year, nor have we been informed of such case by the management.
 - b. No report under sub-section (12) of section 143 of the Companies Act has been filed in Form ADT-4 as prescribed under rule 13 of Companies (Audit and Auditors) Rules, 2014 with the Central Government, during the year and upto the date of this report.
 - c. According to the information and explanations given to us including the representation made to us by the management of the Company, there are no whistle-blower complaints received by the Company during the year.
 - xii. In our opinion and according to the information and explanations given to us, the Company is not a Nidhi Company. Accordingly, the provisions of paragraph 3(xii) of the Order are not applicable to the Company.
 - xiii. According to the information and explanations given to us, all transactions with the related parties made by the Company are in compliance with section 177 and 188 of the Act, where applicable and the relevant details in respect of such transactions have been appropriately disclosed in the standalone Financial Statements under Ind As-24 – "Related Party Disclosures" specified under Section 133 of the Act read with relevant rules.
 - xiv.
 - a. In our opinion the Company has an adequate internal audit system commensurate with the size and the nature of its business.
 - b. We have considered, the internal audit reports for the year under audit, issued to the Company during the year and



till date, in determining the nature, timing and extent of our audit procedures.

- xv. In our opinion during the year the Company has not entered into any non-cash transactions with its Directors or persons connected with its directors. and hence provisions of section 192 of the Companies Act, 2013 are not applicable to the Company.
- xvi.
- a. In our opinion, the Company is not required to be registered under section 45-IA of the Reserve Bank of India Act, 1934. Hence, reporting under clause 3(xvi)(a), (b) and (c) of the Order is not applicable.
- b. In our opinion, the Company is no core investment company (as defined in the Core Investment Companies (Reserve Bank) Directions, 2016) and accordingly reporting under clause 3(xvi)(d) of the Order is not applicable.
- xvii. The Company has incurred cash losses of INR. 89.35 crore during the financial year covered by our audit and no cash losses were incurred in the immediately preceding financial year.
- xviii. There has been no resignation of the statutory auditors of the Company during the year. Accordingly, reporting under clause 3(xviii) of the Order is not applicable.
- xix. According to the information and explanations given to us and on the basis of the financial ratios, ageing and expected dates of realization of standalone financial assets and payment of standalone financial liabilities, other information accompanying the standalone financial statements, our knowledge of the plans of the Board of Directors and management, we are of the opinion that no material uncertainty exists as on the date of the audit report that the Company is capable of meeting its liabilities existing at the date of balance sheet as and when they fall due within a period of one year from the balance sheet date. We, however, state that this is not an assurance as to the future viability of the Company. We further state that our reporting is based on the facts up to the date of the audit report and we neither give any guarantee nor any assurance that all liabilities falling due within a period of one year from the balance sheet date, will get discharged by the company as and when they fall due.
- xx. There are no unspent amounts towards Corporate Social Responsibility (CSR) on other than ongoing projects requiring a transfer to a Fund specified in Schedule VII to the Companies Act in compliance with second proviso to sub-section (5) of Section 135 of the said Act. Accordingly, reporting under clause 3(xx)(a) and (b) of the Order is not applicable for the year.
- xxi. The reporting under clause 3(xxi) is not applicable in respect of audit of standalone financial statements of the Company. Accordingly, no comment has been included in respect of said clause under this report.

For M. L. Puri & Co.
Chartered Accountants
F.R. No.: 00002312N

Place: New Delhi
Date: 08.07.2022
UDIN:22095584AMP6700

(CA. R C Gupta)
Partner
M. No. 095584

Annexure "I" to Clause 7 (iii) of Annexure A to Independent Auditors' Report on the Standalone Financial Statements of MMTC Limited

Mumbai Region

Nature of Statute	Nature of Dues	Year	Amount Involved	Authority	Nature of Statute
Bombay Sales Tax Act	Sales Tax	1989-90	14,96,06,778	Jt. Comm. Of Sale tax (Appeal IV)	Bombay Sales Tax Act
Bombay Sales Tax Act	Sales Tax	1990-91	23,30,46,478	Jt. Comm. Of Sale tax (Appeal IV)	Bombay Sales Tax Act
Bombay Sales Tax Act	Sales Tax	1991-92	28,98,738	Jt. Comm. Of Sale tax (Appeal IV)	Bombay Sales Tax Act
Bombay Sales Tax Act	Sales Tax	2001-02	45,03,961	Jt. Comm. Of Sale tax (Appeal I)	Bombay Sales Tax Act
Bombay Sales Tax Act and Central Sales Tax	Sales Tax	2004-05	42,00,789	Jt. Comm. Of Sale tax (BST Appeals)	Bombay Sales Tax Act and Central Sales Tax
Maharashtra VAT, 2002	Sales Tax	2008-09#	12,33,227	Maharashtra Sales Tax Tribunal	Maharashtra VAT, 2002
Maharashtra VAT, 2002	Sales Tax	2010-11#	42,23,071	Maharashtra Sales Tax Tribunal	Maharashtra VAT, 2002
Maharashtra VAT, 2002	Sales Tax	2009-10#	16,28,050	Maharashtra Sales Tax Tribunal	Maharashtra VAT, 2002
Maharashtra VAT, 2002	Sales Tax	2013-14	12,56,918	Jt. Comm. Of Sale tax (Appeal VI)	Maharashtra VAT, 2002
Central Sale Tax, 1956	Sales Tax	2011-12	47,25,144*	Jt. Comm. Of Sale tax (Appeal VI)	Central Sale Tax, 1956
Central Sale Tax, 1956	Sales Tax	2008-09#	51,81,979	Maharashtra Sales Tax Tribunal	Central Sale Tax, 1956
Central Sale Tax, 1956	Sales Tax	2007-08#	71,97,308	Maharashtra Sales Tax Tribunal	Central Sale Tax, 1956
Central Sale Tax, 1956	Sales Tax	2014-15	3,58,112	Jt. Commissioner of sales tax (Appeal VI)	Central Sale Tax, 1956
Custom Act, 1962	Differential Custom Duty	2012-13	23,98,53,708	Commissioner of Customs	Custom Act, 1962
Custom Act, 1962	Differential Custom Duty	2012-13 & 2013-14	17,83,24,573	Commissioner of Customs (Ahemdabad)	Custom Act, 1962
Nature of Statute	Nature of Dues	Year	Amount Involved	Authority	Nature of Statute

*An Appeals are filed with same appellate authority for common issue.

#Order from the respective Tribunals have been received in May 2022 and the revised amount is not yet determined.

Chennai Region

Nature of Statute	Nature of Dues	Year	Amount	Authority
TNGST Act	Sales Tax Penalty & Interest	2001-02	1,78,566 (SPANDEX YARN)	Assistant Commissioner of Commercial Taxes
TNVAT Act	Sales tax exhibition returns and penalty and interest	1999-20	78,25,755*	High court
TNVAT Act	Sales tax exhibition returns and penalty and interest	2009-10, 2010-11, 2011-12	70,29,982*	Jt. Commissioner of Sales Taxes
Provident Fund	Claims of pension fund	2016	2,23,57,432	High court of Kerela

*Against this, the company had paid the sum of Rs. 1,15,23,689/- under protest.

Vizag Region



Nature of Statute	Nature of Dues	Year	Amount	Authority
APGST*	APGST	1968-69	18,56,325	STAT HYD
APGST*	APGST	1985-86	25,05,806	STAT VIZAG
APGST*	APGST	1989-90	4,79,000	STAT
APGST*	APGST	1991-92	19,34,139	AC LTU
APGST*	APGST	1997-98	25,27,960	STAT VIZAG
CST**	CST	1994-95	8,41,695	AC LTU
CST**	CST	2007-08	1,04,614	ADC
VAT	APVAT	2013-14	22,63,563	ADC
CST	CST	2013-14	4,10,662	ADC
VAT	APVAT	2014-15	4,17,000	ADC
Customs Duty	Customs Duty	2009-10	92,92,463	CESTAT, Hyderabad

*Out of the disputed amounts relating to APGST/VAT/CST the RO has deposited a sum of Rs. 98,70,324/- with the respective authorities.

**Out of the disputed amounts relating to Custom duty the RO had deposited a sum of Rs. 76,07,136/- with the respective authorities.

Kolkata Sub-Region

Nature of Statute	Nature of Dues	Year	Amount	Authority
Central Sales Tax, 1956	Sales Tax	2005-06	10,17,873	Appellate Board
Central Sales Tax, 1956	Sales Tax	2013-14	46,07,728	Calcutta High Court
WB Value Added Tax Act, 2003	West Bengal VAT	2013-14	51,46,313	Calcutta High Court

Hyderabad Region

Nature of Statute	Nature of Dues	Year	Amount	Authority
CST	Central Sales Tax	1989-90	1,49,770	STAT
APGST	Sales Tax	1991-92	24,02,576	STAT
APGST	Sales Tax	1992-93	13,96,269	STAT-VIZAG
APGST	Sales Tax	1993-94	17,62,687	STAT-VIZAG
APGST	Sales Tax	1993-94	6,30,615	STAT-VIZAG
CST	Central Sales Tax	1993-94	4,41,446	STAT-VIZAG
CST	Central Sales Tax	1994-95	2,04,081	AC LTU- VIZAG
APGST	Sales Tax	1997-98	58,43,100	STAT-VIZAG
APGST	Sales Tax	1999-00	39,04,454	STAT-VIZAG
APGST	Sales Tax	2000-01	2,52,926	STAT-VIZAG
VAT	VAT	2006-07	6,76,058	AC LTU, STAT
VAT	VAT	2007-08	71,000	ACAUDIT
VAT	VAT	2008-09	7,84,474	STAT
VAT	VAT	2012-13	99,49,808	ADC (CTO)
CST	Central Sales Tax	2013-14	4,40,000	STAT
AP VAT-JC	VAT	2013-14	22,00,000	APVAT-JC
Customs	CUSTOM DUTY	2021-22	46,47,711	High court of Telangana
Customs	CUSTOM DUTY	2021-22	25,000	Commissioner of Customs, Chennai

Corporate Office

Nature of Statute	Nature of Dues	Year (AY)	Amount	Forum
Income Tax Act	Income Tax	2018-19	2,09,96,930	CIT(A)
Income Tax Act	Income Tax	2017-18	1,59,36,207	CIT(A)
Income Tax Act	Income Tax	2016-17	3,24,12,680	CIT(A)
Income Tax Act	Income Tax	2015-16	1,17,51,934	ITAT
Income Tax Act	Income Tax	2014-15	1,55,24,136	ITAT
Income Tax Act	Income Tax	2013-14	3,11,55,608	High court
Income Tax Act	Income Tax	2012-13	4,15,58,636	High court
Income Tax Act	Income Tax	2009-10	2,10,12,618	ITAT
Income Tax Act	Income Tax	2008-09	52,75,829	CIT(A)/ Sup. Court
Income Tax Act	Income Tax	2005-06	4,51,65,330	Sup. Court
Income Tax Act	Income Tax	2004-05	3,58,34,174	ITAT
Income Tax Act	Income Tax	2003-04	1,08,96,834	ITAT
Income Tax Act	Income Tax	2001-02	1,17,77,218	High Court
Income Tax Act	Income Tax	1999-00	2,85,69,897	ITAT
Income Tax Act	Income Tax	1998-99	58,90,533	ITAT
	Total		33,37,58,537	

Out of the above demand, an amount of Rs. 20,45,10,551 has been deposited by the company.

Delhi Region

Name of Statute	Nature of Dues	Year	Amount	Authority
UP-VAT	LST/CST	1990-91	6,17,588	Moradabad, Allahabad High Court
UP-VAT	LST	1991-92	4,70,578	Moradabad, Allahabad High Court
UP-VAT	LST	1992-93	2,64,037	Moradabad, Allahabad High Court
UP-VAT	LST	1993-94	1,85,100	Moradabad, Allahabad High Court
UP-VAT	LST	1987-88	16,35,160	Joint Commissioner (Appeals), Kanpur
UP-VAT	VAT	1996-97	6,11,808	Commissioner (Appeals), UP-VAT
UP-VAT	VAT+ Interest for non-submission of Form-3B (Gold)& Non-submission of Form 3C1 (Mentha Oil)	2007-08	62,457	Commissioner (Appeals), UP-VAT
Haryana VAT	LST	1992-93	4,24,587	Faridabad, Punjab & Haryana High Court, Chandigarh
MP-VAT	LST	1999-00	1,50,004	Sales Tax Authority, Indore
MP-VAT	LST	1998-99	47,30,692	Assessing Authority, Indore
Custom & Central Excise	Customs Duty & Interest on non-export of Gold Jewellery against Gold Loan by Associates	1999-00	2,72,67,919	Pending before Hon'ble Delhi High Court as per directions of Hon'ble Supreme Court of India.

*Amount paid under protest out of above is INR. 59,53,490



Jaipur Sub - Region

Nature of Statute	Nature of Dues	Year	Amount	Authority
Rajasthan Sales Tax Act	Sales Tax	2003-04	1,49,46,540	Rajasthan Kar Board, Ajmer. (Rs. 35.49 lacs have been deposited under protest). Sales Tax Dept. has appealed against the order of DC (Appeals) in Kar Board.
Rajasthan Sales Tax Act	Sales Tax	1999-00	26,07,605	Rajasthan Kar Board, Ajmer. Pending with Kar Board against demand on account of 4767 MT DAP u/s 84 of RST Act.
Income Tax	Income Tax	2009-10 to 2017-18	23,030	TDS Demand from 2009-10 to 2017-18
Income Tax	Income Tax	2018-19	1,330	TDS Demand
Income Tax	Income Tax	2020-21	590	TDS Demand

Bhubaneswar Region

Nature of Statute	Nature of Dues	Year	Amount	Authority
OST Act	OST	1977-78	41,95,457	SLP Filed in Supreme Court
OAST Act	OAST	1977-78	2,09,773	SLP Filed in Supreme Court
OST Act	OST	1979-80	54,32,092	SLP Filed in Supreme Court
OAST Act	OAST	1979-80	3,00,090	SLP Filed in Supreme Court
OST Act	OST	1980-81	1,30,21,518	SLP Filed in Supreme Court
OAST Act	OAST	1980-81	6,53,245	SLP Filed in Supreme Court
OST Act	OST	1981-82	15,18,451	SLP Filed in Supreme Court
OAST Act	OAST	1981-82	3,27,928	SLP Filed in Supreme Court
Orrisa Sales Tax	Interest Penalty	1978-79	26,50,388	High Court of Orissa
Orrisa Sales Tax	Odisha Sales Tax	1978-79	34,00,919	High Court of Orissa
Orrisa Sales Tax	Odisha Sales Tax	1978-79	1,70,046	High Court of Orissa
Orrisa Sales Tax	Interest Penalty	1979-80	6,53,452	High Court of Orissa
Orrisa Sales Tax	Central Sale Tax	1982-83	34,83,020	High Court of Orissa
Orrisa Sales Tax	Interest	1978-79	3,57,42,030	Revision petition Filed Before CCT & GST, dispose and stayed till disposal of SLP
Orrisa Sales Tax	DEPB	2006-09	14,98,22,308	Odisha Sales Tax Tribunal
Orrisa Sales Tax	DEPB	2010-12	5,08,43,080	High Court of Orissa
OVAT	Value Added Tax	2013-14	14,28,18,841	Odisha Sales Tax Tribunal
CST (Odisha)	Central Sale Tax, 1956	2013-14	58,07,05,822	Odisha Sales Tax Tribunal
ET (Odisha)	Entry Tax	2013-14	52,63,10,091	Odisha Sales Tax Tribunal
CST (Odisha)	Declaration Form Issue	2011-14	75,79,583	Odisha Sales Tax Tribunal
Service Tax Act	Service Tax	2003-05	48,785,949	Customs excise & Service Tax Appellate Tribunal
Central Excise Act	Service Tax	2003-07	234,462,451	Customs Excise & Service Tax Appellate Tribunal
Central Excise Act	Service Tax	2007-08	5,20,97,970	Customs Excise & Service Tax Appellate Tribunal
Central Excise Act	Service Tax	2008-10	107,540,201	Customs Excise & Service Tax Appellate Tribunal

Central Excise Act	Service Tax	2010-11	61,867,556	Writ Petition filed before honorable high court on 8-10-2020
Central Excise Act	Service Tax	2011-12	619,19,930	Writ Petition filed before honorable high court on 8-10-2020
Central Excise Act	Service Tax	2009-12	532,867,400	Writ Petition filed before honorable high court on 8-10-2020
Central Excise Act	Service Tax	2009-11	1,21,30,537	Commissioner of customs Excise & Service Tax , Bhubaneswar
Central Excise Act	Service Tax	2012-13	60,30,943	Writ Petition filed before honourable high court on 8-10-2020
Central Excise Act	Service Tax	2012-13	71780787	Writ Petition filed before honorable high court on 8-10-2020
Central Excise Act	Service Tax	2013-14	9,94,263	Customs Excise & Service Tax Appellate Tribunal
Central Excise Act	Customs	2012-13	1,49,02,87,737	Customs Excise & Service Tax Appellate Tribunal
Central Excise & Custom Act	Service tax	2014-15	17,71,628	Commissioner of customs Excise & Service Tax , Bhubaneswar
Central Excise & Custom Act	Custom Interest and penalty	2017-18	1,32,576	Commissioner of customs Excise & Service Tax, Bhubaneswar
Central Excise Act	Service Tax	2017-18	20,198	Dept Filed Appeal
OST Act	OST	1977-78	41,95,457	SLP Filed in Supreme Court
OAST Act	OAST	1977-78	2,09,773	SLP Filed in Supreme Court

Ahmedabad Sub-Region

Nature of Statute	Nature of Dues	Year	Amount	Authority
Custom Act 1962	Differential Custom Duty	2012-13	17,83,24,573	CESTAT Chennai

Annexure "II" to Clause 8 of Annexure A to Independent Auditors' Report on the Standalone Financial Statements of MMTC Limited

Particulars	Amount of Default as on Balance Sheet Date		Maximum Period of Default (in days)	
	Principal (Rs.)	Interest (Rs.)	Principal	Interest
Name of the lenders Banks:				
Bank of Maharashtra	1,60,00,00,000	22,80,96,513	564	547
Punjab & Sind Bank	3,00,00,00,000	41,91,04,508	561	547
Punjab National Bank	5,00,00,00,000	73,08,89,684	458	547
Indian Bank (erst. Allahabad Bank)	2,00,00,00,000	28,54,95,445	455	547
Union Bank of India (erst. Corporation Bank)	5,00,00,00,000	65,24,22,062	403	547
Grand Total	16,60,00,00,000	2,31,60,07,762		



Annexure B To the Independent Auditor's Report of even date on the Standalone Financial Statements MMTC Limited

Report on the Internal financial Controls under section 143(3)(i) of the Companies Act,2013 ("the Act")

We have audited the internal financial controls over financial reporting of MMTC Limited ("the Company") as of March 31, 2022, 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 Board of Directors 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". These responsibilities include the design, implementation, and maintenance of adequate internal financial controls that were operating effectively for ensuring the orderly and efficient conduct of its business, including adherence to the Company's policies, the safeguarding of its assets, the prevention and detection of frauds and errors, the accuracy and completeness of the accounting records, and the timely preparation of reliable financial information, as required under the Act.

Auditor's Responsibility

Our responsibility is to express an opinion on the Company's internal financial controls over financial of the company reporting based on our audit.

We conducted our audit in accordance with the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting (the "Guidance Note") and the Standards on Auditing, as specified under section 143(10) of the Act, to the extent applicable to an audit of internal financial controls, both applicable to an audit of Internal Financial Controls and, both issued by the Institute of Chartered Accountants of India. Those Standards and the Guidance Note require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether adequate internal financial controls over financial reporting was established and maintained and if such controls operated effectively in all material respects.

An audit involves performing procedures to obtain audit evidence about the adequacy of the internal financial controls system over financial reporting and their operating effectiveness.

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

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion on the 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:

- a) Pertain to the maintenance of records that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the assets of the company;
- b) Provide reasonable assurance that transactions are recorded as necessary to permit the preparation of financial statements in accordance with generally accepted accounting principles and that receipts and expenditures of the company are being made only in accordance with authorizations of management and directors of the company; and
- c) Provide reasonable assurance regarding the 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, 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, 2022, based on "the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India"

For M.L. Puri & Co.
Chartered Accountants
FRN: 002312N

Place: New Delhi
Date: 08.07.2022
UDIN: 22095584AMP7HP6700

CA. R.C. Gupta
Partner
M No.: 095584



**Annexure C To the Independent Auditor's Report of even date in the
Financial Statements of MMTCL LIMITED
Report on the Directions issued by C&AG under section 143(5) of the
Companies Act, 2013 for the Financial Year 2021-2022**

Sr. No.	Key Audit Matter	Auditor's Response
I	Whether the company has system in place to process all the accounting transactions through IT system? If yes, the implications of processing of accounting transactions outside IT system on the integrity of the accounts along with the financial implications, if any, may be stated.	Yes, the company has system in place to process all the accounting transactions through standalone IT System from which data is transferred to its ERP system. However, in the absence of a modern integrated ERP, certain transactions are manually punched/ recorded in the IT System. Those transactions do not have any implication on integrity of the accounts and any financial implication. List of such transactions which are passed manually in the IT system are as below: Based on our audit procedures, on test basis, wherever the accounting transactions are based on workings outside IT system, no instances of lack of integrity of accounts and no financial implications have been noted / reported.
II	Whether there is any restructuring of an existing loan or cases of waiver/write-off of debts /loans/interest etc. made by a lender to the company due to the company's inability to repay the loan? If yes, the financial impact may be stated. Whether such cases are properly accounted for?	The Company had approached all lenders for loan restructuring during the FY 2020-21 and the final loan restructuring agreement was finalized/signed during 2021-22 and signed on 10th June 2022, the Company has benefited by INR. 3.94 crore due to this restructuring and the same has been properly accounted for in the books.
III	Whether funds received/receivable for specific schemes from central/ state agencies were properly accounted for/ utilized as per its term and conditions? List the cases of deviation.	There is no such case.

List of transaction passed manually in ERP system.

S. No.	Accounting Area	Accounting Activity	Impact on integrity and financial implication
1	Sale of retail commodity including IGC	Sale of goods in retail business is done through independent software, the data of which is not automatically integrated into ERP without manual intervention.	None
2	Closing inventory	Valuation of closing inventory at lower of cost or market value is done manually and incorporated in ERP through Journal Vouchers.	None
3	Depreciation	Depreciation as prescribed in schedule III of Companies Act 2013 is to be computed manually and entered into system through Journal Voucher.	None
4	Hedging Entries	Accounting entries for hedging are passed manually and entered in ERP system through Journal Vouchers at each period end.	None
5	Month End expenses provisions	The exercise is done manually and entered into system through Journal Voucher.	None

For M.L. Puri & Co.
Chartered Accountants
FRN: 002312N

Place: New Delhi
Date: 08.07.2022
UDIN: 22095584AMP76700

CA. R.C. Gupta
Partner
M No.: 095584

MANAGEMENT'S REPLY TO AUDITORS' OBSERVATIONS IN THE AUDIT REPORT ON STANDALONE FINANCIAL STATEMENTS FOR 2021-22

Sl. No.	AUDITORS' OBSERVATION	MANAGEMENT'S REPLY
	Qualified Opinion	
1.	We draw attention to note no 16 of the accompanying financial statement, which states that the quarterly returns or statements of current assets are filed by the company with banks on the basis of provisional monthly information statement prepared for internal purposes. As per Notification of Ministry of Corporate affairs ("MCA") dated 24 March 2021, in regards with amendments to schedule III of division II the Company is required to disclose the quarterly reconciliation of statements in agreement with the books. As informed by the management given the volume and nature of business the reconciliation of these statements could not be performed and material discrepancy if any could not be determined. Thus the required disclosure has not been presented in the financial statement	MMTC has entered into one time loan restructuring with banks. After NINL divestment bank liabilities have been discharged. Accordingly there may not be further need to submit stock statement in future as MMTC business has been severally downsized/stopped as per MOC directions and their may not be requirement of bank credit at this stage. Further MMTC has received NIL comments from CAG for 2021-22
2.	We draw attention to note no 35(d) of the accompanying financial statement, which states that There are several provisions for doubtful recoverable amounting to INR 1.13 crore, the recoverability assessment of these balances could not be performed due to non-availability of sufficient information. The company has initiated an internal note to prepare a guideline to assess the recoverability of such balances. As per the management these provisions made relates to balances outstanding for a significant period of time and no sufficient evidence is available for recovery of these accounts, but due to non-availability of any internal guidelines these provisions have not been written off. Accordingly, the provisions and respective recoverable balances would have been reduced by INR. 1.13 crore	These cases are more than two decade old and required documents are not available. Matter will be taken to BOD in current F.Y. MMTC has received NIL comments from CAG for 2021-22
3.	We draw attention to note no 39(f)(a) of the accompanying financial statement, which states that the liability @1.5% of profit before tax ("PBT") for the year in respect of scheme for retirees prior to 01.01.2007 (closed group) has not been recognised even though the Company has reported PBT of INR. 120.60 crore, on the basis of affordability. Also, the Company has not provided form PRMBS (open group) @ 4.5% of Basic and DA for serving employees. During the year provision in respect of retirees after 01.01.2007 pertaining to FY 2019-20 and 2020-21 has been withdrawn due to loss during these previous years. The management will review the above in the next financial year. The non-recognition of provision according to the schemes above constitutes a departure from the accounting standards as prescribed under section 133 of the Act. An amount of INR. 1.81 crore (1.5% of PBT) and INR. 3.29 crore (4.5% of Basic and DA) estimated by the management, should have been provided as per the accounting standards. Accordingly, the provision for PRMBS would have been increased by INR. 5.10 crore and net income and shareholders' fund would have been reduced by the given amount	DPE guidelines provides for contribution based on profit (PBT) keeping in view affordability and sustainability as guiding principle. Accordingly it has been decided by the Company that in view of complete downsize/ stoppage of business activities not to make provisions at this stage. CAG has not make any negative comments on this issue



Sl. No.	AUDITORS' OBSERVATION	MANAGEMENT'S REPLY
	Qualified Opinion	
	<p>01.01.2007 pertaining to FY 2019-20 and 2020-21 has been withdrawn due to loss during these previous years. The management will review the above in the next financial year. The non-recognition of provision according to the schemes above constitutes a departure from the accounting standards as prescribed under section 133 of the Act. An amount of INR. 1.81 crore (1.5% of PBT) and INR. 3.29 crore (4.5% of Basic and DA) estimated by the management, should have been provided as per the accounting standards. Accordingly, the provision for PRMBS would have been increased by INR. 5.10 crore and net income and shareholders' fund would have been reduced by the given amount.</p>	
	Key Audit Matters	
1.	<p>Refer note no. 33 on the claims not acknowledged as debt incorporating therein claims on account of pending legal cases. There are a large number of cases pending before various adjudicating authorities. These legal cases involve significant judgement to determine the possible outcome of those disputes and independent legal assessment to pursue the case.</p> <p>The company has 6 regional offices and different divisions to handle the trade activities including accounting of that particular activity. However, in lot of cases the legal cases are pursued at corporate office level while related financial information / transactions are dealt at RO level, thereby difficulties are faced in giving a comprehensive and holistic treatment to the transaction.</p> <p>Auditor's Response:</p> <p>We obtained list of all the pending legal cases handled at Corporate office legal division on 31st March 2022 with a note from management on the changes in the status of the cases from that of last year. We considered the effect of information provided by the management and analysed the impact of financial obligation of the Company.</p> <p>It was suggested to management to have legal cases and financial obligation if any at the same location in order to have clarity in reporting in financial statement.</p>	<p>Institution of legal cases depends upon the jurisdiction of the court as per the Civil procedure code 1908(CPC). The jurisdiction is determined mainly on the ground of:</p> <p>a) Pecuniary Value b) Territorial jurisdiction of a court c) Subject matter</p> <p>Likewise in case of immovable property the suit is instituted where the immovable property is situated.</p> <p>The regional office which has executed a particular agreement and which is the keeper of the records is more suitable and appropriate to pursue the case before court.</p> <p>However when matters reaches the Supreme Court, then matter is dealt with at corporate office.</p> <p>MMTC has received NIL comments from CAG for 2021-22.</p> <p>In case of closure of ROs/SROs, camp offices with minimum manpower will be retained to take care of ongoing legal cases.</p>
	Emphasis of Matters	
1.	<p>Restructuring and default in loan repayment</p> <p>We draw attention to Note No. 16 of the accompanying financial Statements, which states that the Company had requested all lender banks for restructuring of loan in terms of RBI Circular no. RBI/2020-21/16 DOR No.BP/BC/3/21.04.048/2020-21 dated 06.08.2020 for resolution of Covid-19 related stress, the loan was further restructured as on 08.06.2021 wherein the due date of loan and interest repayment was 30.03.2022 with a review period of 30 days. Total outstanding bank loan and interest was to be paid in one go on or before 29.04.2022 (30 days review period after 30.03.2022), mainly out of NINL divestment. As bank loan along with interest could not be repaid on due date/ review period due to non-receipt of disinvestment proceeds of NINL, MMTC account with all lender banks has been downgraded to</p>	<p>Consequent upon receipts of divestment proceeds from NINL on 4.7.2022 an amount of Rs 2551.44 crore as on 31.3.2022 have been paid towards principal and normal agreed interest upto 31.3.2022. Company has paid principal and normal interest and taking up positively with lenders for relaxation of penal interest, processing fee, other charges. An amount of Rs111.24 crore relating to interest and RTR has been accounted in June 22 quarter out of which Rs 50.30 crore pertains to normal interest charged from 1.4.2022 till 6.7.2022 and remaining amount of Rs 60.94 crore relates to provision of interest and RTR their on. MMTC has received NIL comments from CAG for 2021-22.</p>

Sl. No.	AUDITORS' OBSERVATION	MANAGEMENT'S REPLY
	Emphasis of Matters	
2.	<p><u>Non-compliance of regulation 33 of SEBI</u></p> <p>We draw attention to Note No. 33 (vi) to the accompanying financial statements, which states that the Company has created a contingent liability of INR 0.07 crore on account of demand raised by Stock Exchange Board of India (SEBI) in relation to non-compliance of regulation 33 of SEBI. The management is in the process of having these demands waived and thus no provision has been made in the financial statements</p> <p>Our opinion is not modified in respect of the above matter.</p>	<p>The Company has taken up with the Stock Exchanges for waiver of demand for non compliance of Regulation 33 of SEBI.</p> <p>MMTC has received NIL comments from CAG for 2021-22.</p>





FINANCIAL STATEMENTS

for the financial year ended 31st March, 2022





MMTC Limited			
Balance Sheet as at March 31, 2022			
(₹ in Crores)			
Particulars	Note No	As at March 31, 2022	As at March 31, 2021
ASSETS			
Non-current assets			
Property, Plant and Equipment	3	30.57	34.39
Right to Use Assets	3	2.97	3.35
Capital work-in-progress	3	-	-
Investment Property	4	3.71	3.88
Other intangible assets	5	0.24	0.39
Financial Assets			
Investments	6A	31.62	22.83
Trade Receivables	7A	-	-
Loans	8	2.28	3.50
Others	9	45.36	47.47
Deferred tax Assets (net)	10	214.41	555.44
Other non-current Assets	11A	24.04	24.59
Current Assets			
Inventories	12	29.79	45.64
Financial Assets			
Investments	6B	-	-
Trade Receivables	7B	135.10	555.69
Cash & Cash Equivalents	13	43.36	132.71
Bank Balances other than above	14	17.46	33.21
Loans	8	1.00	1.36
Others	9	8.82	26.62
Current Tax Assets (net)	15	3.61	2.64
Other Current Assets	11B	3,709.51	3,546.10
Assets held for Sale	6C	459.11	466.95
Total Assets		4,762.96	5,506.76
EQUITY AND LIABILITIES			
Equity			
Equity Share Capital	16A	150.00	150.00
Other Equity	16B	43.40	272.46
Liabilities			
Non-current liabilities			
Financial Liabilities			
Lease Liabilities	19A	3.46	3.61
Provisions	20A	37.40	44.03
Current liabilities			
Financial Liabilities			
Borrowings	17B	2,551.44	2,364.01
Trade payables			
Total outstanding dues of micro and small enterprise	18	0.18	0.03
Total outstanding dues of creditors other than micro and small enterprise		269.71	764.98
Lease Liabilities	19B	0.13	0.35
Other Financial Liabilities	19C	218.45	208.47
Other current liabilities	21	385.54	772.23
Provisions	20B	1,081.75	926.59
Current Tax Liabilities (net)	22	21.50	-
Total Equity and Liabilities		4,762.96	5,506.76

See accompanying notes to Financial Statements
As per our report of even date attached
For M. L. Puri & Co.
Chartered Accountants
F.R. No.: 002312N

1 to 55
For and on behalf of Board of Directors

(CA. R C Gupta)
Partner
M. No. 095584

(G. Anandanarayanan)
Company Secretary
ACS-13691

(B.N. Dash)
Chief General Manager(F&A)

(Kapil Kumar Gupta)
Director (F) & CFO
DIN:08751137

Date: 08.07.2022
Place: New Delhi

(J Ravi Shanker)
Director
DIN: 06961483

(Vibhu Nayar)
Chairman and Managing Director
DIN: 03590141

MMTC Limited			
Statement of Profit and Loss for the year ended March 31, 2022			
(₹ in Crore)			
Particulars	Note No.	Year Ended March 31, 2022	Year Ended March 31, 2021
Income			
Revenue From Operations	23	8,393.29	26,381.61
Other Income	24	54.44	42.19
Total Income (I)		8,447.73	26,423.80
Expenses			
Cost of material consumed	25	107.40	75.51
Purchase of Stock in Trade	26	7,284.64	24,948.63
Changes in inventories of finished goods, stock in trade and work in progress	27	11.76	161.85
Employees' Benefit Expenses	28	114.42	135.04
Finance Cost	29	205.94	198.48
Depreciation & Amortization Expenses	30	4.57	4.94
Other Expenses	31	443.20	1,116.39
Total expenses (II)		8,171.93	26,640.84
Profit/(Loss) before exceptional items and tax (I-II)		275.80	(217.04)
Exceptional Items - expense/(income)	32	155.20	877.17
Profit / (Loss) Before Tax		120.60	(1,094.22)
Tax expense			
Current tax	33	21.50	-
Adjustments relating to prior periods		-	0.07
Deferred tax		341.03	(324.60)
Total Tax Expense		362.53	(324.53)
Profit/(Loss) for the year (A)		(241.93)	(769.69)
Other Comprehensive Income/(Loss)			
Items that will not be reclassified to profit or loss:			
-Remeasurements of the defined benefit plans		11.90	6.93
-Equity Instruments through other comprehensive income		0.97	1.07
Total Other Comprehensive Income / (Loss) net of tax (B)		12.87	8.00
Total Comprehensive Income / (Loss) for the year (A)+(B)		(229.06)	(761.69)
Earnings per equity share :			
Basic & Diluted (in ₹)	43	(1.61)	(5.13)

See accompanying notes to Financial Statements
As per our report of even date attached
For M. L. Puri & Co.
Chartered Accountants
F.R. No.: 002312N

1 to 55
For and on behalf of Board of Directors

(CA. R C Gupta)
Partner
M. No. 095584

(G. Anandanarayanan)
Company Secretary
ACS-13691

(B.N. Dash)
Chief General Manager(F&A)

(Kapil Kumar Gupta)
Director (F) & CFO
DIN:08751137

Date: 08.07.2022
Place: New Delhi

(J Ravi Shanker)
Director
DIN: 06961483

(Vibhu Nayar)
Chairman and Managing Director
DIN: 03590141



MMTC Limited			
Cash Flow Statement For The Year Ended March 31, 2022			
(₹ in Crore)			
Particulars	For the year ended March 31, 2022		For the year ended March 31, 2021
A. CASH FLOW FROM OPERATING ACTIVITIES			
Net Profit/Loss before tax		120.60	(1,094.22)
Adjustment for:-			
Loss on valuation of inventories	0.01		1.59
Depreciation & amortisation expense	4.57		4.94
Net Foreign Exchange (gain)/loss	4.36		(11.95)
(Profit) /Loss on sale of PPE & Right to Use Assets	(0.04)		(1.38)
Provision for dimunition in value of non current investment	0.01		-
Interest income	(4.30)		(4.68)
Dividend income	(37.26)		(28.71)
Finance Costs	205.83		197.99
Interest Expense on Lease	0.11		0.49
Debts/claims written off	0.02		5.80
CSR expenditure	0.05		0.89
Allowance for Bad and Doubtful Debts / claims/ advances	1.05		1.06
Provision no longer Required	(23.22)		(0.30)
Liabilities Written Back	(9.15)		(4.38)
Provision for DWA risk	-		0.08
		142.04	161.46
Operating Profit before Working Capital Changes		262.64	(932.75)
Adjustment for:-			
Inventories	15.84		170.51
Trade Receivables	438.48		1,367.33
Loans & Other Financial Assets	21.50		5.05
Other current & non current assets	(147.12)		(92.81)
Trade payables	(486.06)		113.90
Other Financial Liabilities	9.61		7.26
Other current & non current liabilities	(386.70)		73.70
Provisions	160.39	(374.06)	879.34
		(111.42)	(1,591.52)
Taxes Paid		(0.97)	8.74
Net cash flows from operating activities		(112.39)	1,600.26
B. CASH FLOW FROM INVESTING ACTIVITIES			
Purchase of fixed assets	(0.05)		(0.49)
Sale of fixed Assets	0.04		2.61
Sale/(Purchase) of Investment	0.00		0.02
Interest received	4.30		4.68
Dividend Received	37.26	41.55	28.71
		41.55	35.53
Net cash flows from investing activities		41.55	35.53
C. CASH FLOW FROM FINANCING ACTIVITIES			
Borrowings	187.43		(1,367.87)
Finance Costs	(205.83)		(197.99)
Lease (Interest)	(0.11)		(0.49)
Dividend (inclusive of tax) paid	-	(18.51)	-
		(18.51)	(1,566.36)
Net Cash From Financing Activities		(18.51)	(1,566.36)
D. Net changes in Cash & Cash equivalents		(89.35)	69.44
E. Opening Cash & Cash Equivalents (Note No 13)		132.71	63.27
F. Closing Cash & Cash Equivalents (Note No 13)		43.36	132.71

Note:

1. The above cash flow statement has been prepared under the "indirect method" as set out in Ind AS 7 on Statement of Cash Flows.
2. Adjustments for certain accruals/deferrals made at Corporate Office on the basis of information received from branch offices.
- 3 Cash and Cash Equivalents consist of:-

(₹ in crore)

Particulars	As at March 31, 2022	As at March 31, 2021
Balances with Banks		
(a) in Current Account	6.76	40.64
(b) In term deposit with original maturity upto 3 months	15.57	57.92
(c) Debit balance in Cash Credit Account	20.96	33.99
Cheques / Drafts / Stamps on hand	0.00	0.00
Cash on hand	0.07	0.16
	43.36	132.71

As per our report of even date attached

For and on behalf of Board of Directors

For M. L. Puri & Co.
 Chartered Accountants
 F.R. No.: 00002312N

(CA. R C Gupta)
 Partner
 M. No. 095584

(G. Anandanarayanan)
 Company Secretary
 ACS-13691

(B.N. Dash)
 Chief General Manager(F&A)

(Kapil Kumar Gupta)
 Director (F) & CFO
 DIN:08751137

Date: 08.07.2022
 Place: New Delhi

(J Ravi Shanker)
 Director
 DIN: 06961483

(Vibhu Nayar)
 Chairman and Managing Director
 DIN: 03590141



MMTC LIMITED

Statement of Changes in Equity for the period ended 31.03.2022

1. Equity Share Capital

		(₹ in crore)	
Particulars	No of Shares	Amount	
Balance as at 1.4.2021	1,500,000,000	150.00	
Changes in Equity Share Capital during the year	-	-	
Balance as at 31.3.2022	1,500,000,000	150.00	

		(₹ in crore)	
Particulars	No of Shares	Amount	
Balance as at 1.4.2020	1,500,000,000	100.00	
Changes in Equity Share Capital during the year	-	-	
Balance as at 31.3.2021	1,500,000,000	150.00	

B. Other Equity as at March 31, 2022

	Share application money pending allotment	Reserves and Surplus			Equity Instruments through OCI	Effective Portion of cash flow hedges	Exchange difference on translation	Other items of OCI	Total
		Research & Development Reserve	General Reserve	Retained Earnings					
Balance as at 1.4.2021	-	-	596.97	(308.86)	(8.93)	-	-	(6.72)	272.46
Changes in accounting policy or prior period errors	-	-	-	-	-	-	-	-	-
Total comprehensive income for the year	-	-	-	(241.93)	0.97	-	-	11.90	(229.06)
Dividend and DDT	-	-	-	-	-	-	-	-	-
Unamortized premium on forward contract	-	-	-	-	-	-	-	-	-
Items recognized directly in retain earnings	-	-	-	-	-	-	-	-	-
Re-measurements of defined benefit plans	-	-	-	-	-	-	-	-	-
Any other changes	-	-	-	-	-	-	-	-	-
Balance as at 31.3.2022	-	-	596.97	(550.79)	(7.96)	-	-	5.18	43.40

Other Equity as at March 31, 2021

	Share application money pending allotment	Reserves and Surplus			Equity Instruments through OCI	Effective Portion of cash flow hedges	Exchange difference on translation	Other items of OCI	Total
		Research & Development Reserve	General Reserve	Retained Earnings					
Balance as at 1.4.2020	-	-	596.97	460.83	(10.00)	-	-	(13.65)	1,034.15
Changes in accounting policy or prior period errors	-	-	-	-	-	-	-	-	-
Total comprehensive income for the year	-	-	-	(769.69)	1.07	-	-	6.93	(761.69)
Dividend and DDT	-	-	-	-	-	-	-	-	-
Unamortized premium on forward contract	-	-	-	-	-	-	-	-	-
Items recognized directly in retain earnings	-	-	-	-	-	-	-	-	-
Re-measurements of defined benefit plans	-	-	-	-	-	-	-	-	-
Any other changes	-	-	-	-	-	-	-	-	-
Balance as at 31.3.2021	-	-	596.97	(308.86)	(8.93)	-	-	(6.72)	272.46

Dividend not recognised at the end of reporting period

(₹ in crores)

	As at March 31, 2022	As at March 31, 2021
Dividend proposed	-	-

As per our report of even date attached

For and on behalf of Board of Directors

For M. L. Puri & Co.
Chartered Accountants
F.R. No.: 00002312N

(CA. R C Gupta)
Partner
M. No. 095584

(G. Anandanarayanan)
Company Secretary
ACS-13691

(B.N. Dash)
Chief General Manager(F&A)

(Kapil Kumar Gupta)
Director (F) & CFO
DIN:08751137

Date: 08.07.2022
Place: New Delhi

(J Ravi Shanker)
Director
DIN: 06961483

(Vibhu Nayar)
Chairman and Managing Director
DIN: 03590141



MMTC LIMITED

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

1. General Information

Established in 1963 and domiciled in India, the Company is a Mini-Ratna public sector undertaking under the administrative control of Ministry of Commerce & Industry, Government of India. The registered office of the Company is situated at Core-1, Scope Complex, 7, Institutional Area, Lodi Road, New Delhi-110003, India. The company has 5 Regional Offices at various places in India and a wholly owned subsidiary MMTC Transnational Pte Ltd, at Singapore.

The principal activities of the Company are export of Minerals and import of Precious Metals, Non-ferrous metals, Fertilizers, Agro Products, coal and hydrocarbon etc. The company's trade activities span across various countries in Asia, Europe, Africa, Middle East, Latin America and North America.

2. Significant Accounting Policies

2.1 Statement of Compliance and basis of preparation of Financial Statements

The financial statements have been prepared in accordance with Indian Accounting Standards (Ind-AS) as notified under the Companies (Indian Accounting Standards) Rules, 2015 and subsequent amendments thereto. Accounting policies have been applied consistently to all periods presented in these financial statements. The Financial Statements are prepared under historical cost convention on going concern basis from the books of accounts maintained under accrual basis except for certain financial instruments which are measured at fair value and in accordance with the Indian Accounting Standards prescribed under the Companies Act, 2013

2.2 Functional & presentation currency

These financial statements are presented in Indian rupees, the national currency of India, which is the functional currency of the Company. All amounts included in the financial statements are reported in crores of Indian rupees (upto two decimal) except number of equity shares and per share data and when otherwise indicated.

2.3 Use of estimates and judgment

The preparation of financial statements requires judgements, estimates and assumptions to be made that affect the reported amount of assets and liabilities, disclosure of contingent liabilities on the date of financial statements and the reported amount of revenues and expenses during the reporting period. Difference between the actual results and estimates are recognised in the period in which the results are known/materialised.

2.4 Revenue Recognition

i) Trading Income

Revenue from sale of goods is measured at fair value of the consideration received or receivable, net of returns and allowances, trade discount and volume rebates. Revenue is recognized when the company satisfies a performance obligation by transferring the promised goods or services to a customer and the customer obtains control of the same and it is probable that the company will collect the consideration to which it is entitled in exchange for the goods or services that is transferred to the customer.

Purchases and Sales

- a. In case of certain commodities import of which is canalized through the company, imported on 'Government Account' against authorization letter issued by the Government of India, Purchase/ Sale is booked in the name of the Company
- b. Products are also traded through the commodity exchanges. Purchase/ Sale is booked in respect of trade done through different commodity exchanges and is backed by physical delivery of goods.
- c. Gold/Silver kept under deposit: As per the arrangements with the Suppliers of Gold/Silver, the metal is kept by the supplier with the company on unfixed price basis for subsequent withdrawal on loan or outright purchase basis.
 - (i) Purchases include gold/silver withdrawn from consignment deposit of the supplier on outright purchase basis for sale to exporters, as per the scheme of Foreign Trade Policy being operated by the Company as a nominated agency.
 - (ii) Purchase of Gold/Silver during the year for domestic sale is accounted for on withdrawal from the Gold/Silver consignment deposit of the supplier and fixation of price with the suppliers. The stock held by the company at year end as Gold/ Silver under Deposit is accounted for under current assets as 'stock towards unbilled purchases' and under current liability as 'amount payable towards unbilled purchases' at the bullion price prevailing as at the close of the year. However, customs duty paid in respect of balance in

deposits is accounted for as prepaid expenses.

- (iii) Gold/silver withdrawn on loan basis from the Gold/Silver under deposit, are booked as loan given to customers and grouped under financial assets. The corresponding liability towards the stocks received from foreign suppliers is grouped under Trade Payable. Loan/Trade Payable are adjusted when purchases and sales are booked.

d. In respect of Gold/Silver sourced domestically where price fixation is deferred, purchase is initially accounted for on the basis of invoice received from the supplier. The difference, if any, arising on price fixation is accounted for through debit / credit note.

e. In the case of gold/ silver supplied to exporters on replenishment basis, the purchase in respect of gold/silver booked by exporter by paying margin money, is booked after "fixing" the price with the foreign suppliers. However, sale is booked when quantity is actually delivered to exporters after completion of export.

- f. High Sea Sales

Sale during the course of import by transfer of documents of title i.e. high seas sale is booked upon transfer of documents of title to the goods, upon which buyer obtains control over the goods and the company becomes entitled to receive sales consideration, in favour of buyer before the goods cross the custom frontiers of India.

- ii) Other Operating Revenue

The income relating to the core activities of the company which are not included in revenue from sales / services for e.g. dispatch earned, subsidy, claims against losses on trade transactions, interest on credit sales and trade related advances (other than on overdue) etc., which are derived based on the terms of related trade agreements with business associates or schemes on related trade, are accounted for under 'Other Operating Revenue'.

- iii) Claims

Claims are recognized in the Statement of Profit & Loss (Net of any payable) on accrual basis including receivables from Govt. towards subsidy, cash incentives, reimbursement of losses etc, when its ultimate realisation is probable. Claims recognized but subsequently becoming doubtful are provided for through Statement of Profit and Loss. Insurance claims are accounted upon being accepted by the insurance company. Claims towards shortages/ damages including liquidated damages/ deficiencies in quality/quantity etc are accounted for in accordance with the provisions of relevant contracts. In case there is no such provisions in the existing contract, the claim is accounted for on receipt of acceptance by the party besides collectability of the claim amount being probable. On recognition of such claims the same will be realised/set off against advance received/claims payable etc. to the same party.

- iv) Service Income

Revenue from services is booked, when performance obligation is satisfied by transferring the promised services to the customers, for the consideration to which the company is entitled.

- v) Dividend and interest income

Dividend income from investments is recognized when the Company's right to receive payment is established and it is probable that the economic benefits associated with the transactions will flow to the Company and the amount of income can be measured reliably.

Interest income is recognised on a time proportion basis taking into account the amount outstanding and the effective interest rate, which is the rate that exactly discounts estimated future cash receipts through the expected life of the financial asset to the gross carrying amount of a financial asset.

- vi) Revenue Recognition on Actual Realization

Revenue is recognized on accrual basis except in the following items which are accounted for on actual realization since realisability of such items is uncertain, in accordance with the provisions of Ind AS- 115:-

- a) Duty credit / exemption under various promotional schemes of Foreign Trade Policy in force, Tax credit, refund of custom duty on account of survey shortage, and refund of income-tax/service tax / sales-tax /VAT/GST and interest thereon etc.
- b) Decrees pending for execution/contested dues and interest thereon, if any:
- c) Interest on overdue recoverable where realisability is uncertain.
- d) Liquidated damages on suppliers/underwriters.

2.5 Property, Plant and Equipments

The cost of an item of property, plant and equipment is 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. The cost of an item of PPE is the cash price equivalent at the recognition date. The cost of an item of PPE comprises:

- i) Purchase price, including import duties and non-refundable purchase taxes, after deducting trade discounts and rebates.
- ii) Costs directly attributable to bringing the PPE to the location and condition necessary for it to be capable of operating in the manner intended by management.
- iii) The initial estimate of the costs of dismantling and removing the item and restoring the site on which it is located, the obligation for which the company incurs either when the PPE is acquired or as a consequence of having used the PPE during a particular period for purposes other than to produce inventories during that period.

The company has chosen the cost model of recognition and this model is applied to an entire class of PPE. After recognition as an asset, an item of PPE is carried at its cost less any accumulated depreciation and any accumulated impairment losses.

Certain items of small value like calculators, wall clock, kitchen utensils etc. whose useful life is very limited and the cost of such item is upto Rs.2000/- in each case, are directly charged to revenue in the year of purchase. Cost of mobile handsets is also charged to revenue irrespective of cost.

2.6 Intangible Assets

Identifiable intangible assets are recognized when the company controls the asset; it is probable that future economic benefits expected with the respective assets will flow to the company for more than one economic period; and the cost of the asset can be measured reliably. At initial recognition, intangible assets are recognized at cost. Intangible assets are amortized on straight line basis over estimated useful lives from the date on which they are available for use. Softwares are amortized over its useful life subject to a maximum period of 5 years or over the license period as applicable. Intangible assets upto Rs.2,000/- in each case are directly charged to revenue.

No intangible assets arising from research is recognised and expense on research directly charged to profit and loss account when it is incurred. An intangible assets arising from development is recognised, if the asset fulfils the criteria for recognition as per Ind AS. Expenditure on an intangible item that was initially recognised as an expense is not recognised as part of the cost of an intangible asset at a later date.

2.7 Non-Current Assets Held for Sale

The company classifies a non-current asset (or disposal group of assets) as held for sale if its carrying amount will be recovered principally through a sale transaction rather than through continuing use. The non-current asset (or disposal group) classified as held for sale is measured at the lower of its carrying amount and the fair value less costs to sell.

2.8 Depreciation

Depreciation is provided on straight line method as per the useful lives approved by the Board of Directors, which are equal to those provided under schedule II of the Companies Act, 2013. The useful life of an asset is reviewed at each financial year-end. Each part of an item of PPE with a cost that is significant in relation to the total cost of the asset and if the useful life of that part is different from remaining part of the asset; such significant part is depreciated separately. Depreciation on all such items have been provided from the date they are 'Available for Use' till the date of sale / disposal and includes amortization of intangible assets and lease hold assets. Freehold land is not depreciated. An item of PPE is derecognized upon disposal or when no future economic benefits are expected to arise from the continued use of the asset.

The residual value of all the assets is taken as Re 1/-. The useful lives of the assets are taken as under:-

Name of Assets	Useful life as adopted by the company as per Schedule II
A. General Assets	
Furniture & Fittings	10
Office Equipment	5
Vehicles – Scooter	10
Vehicles – Car	8
Computers - Servers and networks	6
Computers – End User Devices	3
Lease-hold Land	As per Lease Agreement
Wagon Rakes	As per Agreement / Wagon Investment Scheme
Electrical installations excluding fans	10
Water Supply, Sewerage and Drainage	5
Roads	
Carpeted Roads – RCC	10
Carpeted Roads - Other than RCC	5
Non Carpeted Roads	3
Culverts	30
Buildings	
RCC	60
Other than RCC	30
Residential Flats (Ready Built)	
RCC	60
Other than RCC	30
Temporary Structure & wooden partition	3
Warehouse / Godown	30
B. Manufacturing Unit's Assets	
Factory Buildings	30
Electronic installations excluding fans	10
Water Supply, Sewerage and Drainage	5
Plant and Machinery	
Single Shift	15
Double Shift	10
Triple Shift	7.5
Plant and Machinery- Wind Energy Generation Plant	22
C. Fixed Assets created on Land and neither the Fixed Assets nor the Land belongs to the Company	
	5
D. Amortization of Intangible Assets	
Softwares	5 years or License period as applicable

2.9 Impairment

If the recoverable amount of an asset (or cash-generating unit) is estimated to be less than its carrying amount, the carrying amount of the asset (or cash-generating unit) is reduced to its recoverable amount. An impairment loss is recognized immediately in profit or loss, unless the relevant asset is carried at a revalue amount, in which case the impairment loss is treated as a revaluation decrease.

Recoverable amount is the higher of fair value less costs of disposal and value in use. In assessing value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset for which the estimates of future cash flows have not been adjusted.

When an impairment loss subsequently reverses, the carrying amount of the asset (or a cash-generating unit) is increased to the revised estimate of its recoverable amount, so that the increased carrying amount does not



exceed the carrying amount that would have been determined had no impairment loss been recognized for the asset (or cash-generating unit) in prior years. A reversal of an impairment loss is recognized immediately in profit or loss, unless the relevant asset is carried at a revalued amount, in which case the reversal of the impairment loss is treated as a revaluation increase.

At the end of each reporting period, the company reviews the carrying amounts of its tangible, intangible assets to determine whether there is any indication that those assets have suffered an impairment loss. If any such indication exists, the recoverable amount of the asset is estimated in order to determine the extent of the impairment loss (if any). When it is not possible to estimate the recoverable amount of an individual asset, the Company estimates the recoverable amount of the cash-generating unit to which the asset belongs. Intangible assets with indefinite useful lives and intangible assets not yet available for use are tested for impairment at least annually, and whenever there is an indication that the asset may be impaired.

Impairment of financial assets

Financial assets, other than those at Fair Value through Profit and Loss (FVTPL), are assessed for indicators of impairment at the end of each reporting period. Financial assets are considered to be impaired when there is objective evidence that, as a result of one or more events that occurred after the initial recognition of the financial asset, the estimated future cash flows of the investment have been affected. For Available for Sale (AFS) equity investments, a significant or prolonged decline in the fair value of the security below its cost is considered to be objective evidence of impairment.

For all other financial assets, objective evidence of impairment could include:

- Significant financial difficulty of the issuer or counterparty;
- Breach of contract, such as a default or delinquency in interest or principal payments;
- It becoming probable that the borrower will enter bankruptcy or financial re-organisation; or the disappearance of an active market for that financial asset because of financial difficulties.

For certain categories of financial assets, such as trade receivables, assets are assessed for impairment on individual basis. Objective evidence of impairment for a portfolio of receivables could include company's past experience of collecting payments, an increase in the number of delayed payments in the portfolio past the average credit period of zero days, as well as observable changes in national or local economic conditions that correlate with default on receivables.

For financial assets that are carried at cost, the amount of impairment loss is measured as the difference between the asset's carrying amount and the present value of the estimated future cash flows discounted at the current market rate of return for a similar financial asset. Such impairment loss will not be reversed in subsequent periods

The carrying amount of the financial asset is reduced by the impairment loss directly for all financial assets with the exception of trade receivables; such impairment loss is reduced through the use of an allowance account for respective financial asset. When a trade receivable is considered uncollectible, it is written off against the allowance account. Subsequent recoveries of amounts previously written off are credited against the allowance account. Changes in the carrying amount of the allowance account are recognized in profit or loss.

For financial assets measured at amortised cost, if, in a subsequent period, the amount of the impairment loss decreases and the decrease can be related objectively to an event occurring after the impairment was recognized, the previously recognized impairment loss is reversed through profit or loss to the extent that the carrying amount of the investment at the date the impairment is reversed does not exceed what the amortised cost would have been had the impairment not been recognized.

De-recognition of financial assets

The Company de-recognises a financial asset when the contractual rights to the cash flows from the asset expire, or when it transfers the financial asset and substantially all the risks and rewards of ownership of the asset to another party. If the Company neither transfers nor retains substantially all the risks and rewards of ownership and continues to control the transferred asset, The Company recognises its retained interest in the asset and an associated liability for amounts it may have to pay. If the Company retains substantially all the risks and rewards of ownership of a transferred financial asset, the Company continues to recognise the financial asset and also recognises a collateralised borrowing for the proceeds received.

On de-recognition of a financial asset in its entirety, the difference between the asset's carrying amount and the sum of the consideration received and receivable and the cumulative gain or loss that had been recognized in other comprehensive income and accumulated in equity is recognized in profit or loss.

2.10 Borrowing Costs

The Company capitalises borrowing costs that are directly attributable to the acquisition, construction or production of qualifying asset as a part of the cost of the asset.

The Company recognises other borrowing costs as an expense in the period in which it incurs them.

A qualifying asset is an asset that necessarily takes a substantial period of time to get ready for its intended use or sale.

2.11 Foreign currency translation

Transactions in currencies other than the functional currency are recognized at the rates of exchange prevailing at the dates of the transactions.

At the end of each reporting period, monetary items denominated in foreign currencies are retranslated at the rates prevailing at that date. Non-monetary items carried at fair value that are denominated in foreign currencies are re-translated at the rates prevailing at the date when the fair value was determined. Non-monetary items that are measured in terms of historical cost in a foreign currency are not retranslated.

Foreign currency monetary items (except overdue recoverable where realisability is uncertain) are converted using the closing rate as defined in the Ind AS-21. Non-monetary items are reported using the exchange rate at the date of the transaction. The exchange difference gain/loss is recognized in the Statement of Profit and Loss.

Liability in foreign currency relating to acquisition of fixed assets is converted using the closing rate. The difference in exchange is recognized in the Statement of Profit and Loss.

2.12 Inventory

Inventories are stated at the lower of cost and net realisable value. Net realisable value represents the estimated selling price for inventories less all estimated costs of completion and costs necessary to make the sale. The method of determination of cost and valuation is as under:

- a) Exports:
 - (i) Cost of export stocks is arrived at after including direct expenses incurred up to the point at which the stocks are lying. Similarly the realisable value is derived by deducting from the market price the expenses to be incurred from that point to the stage where they are sold.
 - (ii) In respect of mineral ores the realisable value of ores is worked out at the minimum of the Fe/Mn contents of the grade of the ore as per export contract and is compared with the weighted average cost at weighted average Fe/Mn contents/weighted average moisture contents of the ore. The embedded stocks of Iron ore are excluded from inventory and hence not valued.
- b) Imports:
 - (i) The cost of imported stocks is arrived at by working out the yearly regional weighted average cost except for Non-ferrous Metals where weighted average cost of remaining stock after including all expenses incurred up to the point at which they are lying is considered. However, where stocks are specifically identifiable, actual cost of the material including all expenses incurred up to the point at which they are lying is considered.
 - (ii) Gold/Silver purchased from foreign suppliers against booking by exporters under replenishment option and not delivered at the year-end are shown as stocks of company and valued at cost.
- c) Domestic:
 - (i) The cost of gold/silver medallions and silver articles is arrived at by working out the yearly location-wise weighted average cost of material and cost of opening stock. Costs include manufacturing/fabrication charges, wastages and other direct cost.
 - (ii) In case of cut & polished stones and jewellery (finished/semi-finished) where stocks are specifically identifiable, actual cost of the material including all expenses incurred up to the point at which they are lying is considered. Costs include wastage and other direct manufacturing costs.
- d) Packing material
Packing material is valued at lower of the cost or net realisable value.
- e) Stocks with fabricators
Stocks with fabricators are taken as the stocks of the company, till adjustments.

2.13 Provisions

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

2.14 Contingent Liabilities / Assets

Contingent Liabilities

Contingent liabilities are not recognized but disclosed in Notes to the Accounts when the company has possible obligation due to past events and existence of the obligation depends upon occurrence or non-occurrence of future events not wholly within the control of the company.



Contingent liabilities are assessed continuously to determine whether outflow of economic resources have become probable. If the outflow becomes probable then relative provision is recognized in the financial statements.

Where an entity is jointly and severally liable for an obligation, the part of the obligation that is expected to be met by other parties is treated as a contingent liability. The entity recognises a provision for the part of the obligation for which an outflow of resources embodying economic benefits is probable, except in the extremely rare circumstances where no reliable estimate can be made

Contingent Liabilities are disclosed in the General Notes forming part of the accounts

Contingent Assets

Contingent Assets are not recognised in the financial statements. Such contingent assets are assessed continuously and are disclosed in Notes when the inflow of economic benefits becomes probable. If it's virtually certain that inflow of economic benefits will arise then such assets and the relative income will be recognised in the financial statements.

2.15 Leases

An asset held under lease is classified as a finance lease if it transfers substantially all the risks and rewards incidental to ownership of an underlying asset.

An asset held under lease is classified as an operating lease if it does not transfer substantially all the risks and rewards incidental to ownership of an underlying asset.

The company normally enters into operating leases which are accounted for as under:-

- (i) Rental income from operating leases is recognized either on a straight-line basis or another systematic basis over the term of the relevant lease.
- (ii) Where the company is lessee, at commencement date right to use of assets are recognized at cost and the present value of lease payments that are not paid recognized as lease liability. Subsequently, right of use assets measured by using cost model with any adjustment required for re-measurement of lease liability and lease liability is measured by increasing the carrying amount to reflect the interest on lease liability, reducing the carrying amount to reflect the lease payments made and re-measuring the carrying amount to reflect any re-assessment or lease modifications.
- (iii) As a practical expedient , short term leases and leases for which the underlying assets is of low value upto Rs.1,00,000/- per month or Rs.12,00,000/-per year are not recognized as per the provisions given under Ind AS-116 (Leases) and are recognized as an expense on a straight line basis over the lease term.

2.16 Employee benefits

- i. Provision for gratuity, leave compensation and long service benefits i.e. service award, compassionate gratuity, employees' family benefit scheme and special benefit to MICA division employees is made on the basis of actuarial valuation using the projected unit credit method. Re-measurement, comprising actuarial gains and losses, the effect of the changes to the asset ceiling (if applicable) and the return on plan assets (excluding interest), is reflected immediately in the statement of financial position with a charge or credit recognized in other comprehensive income in the period in which they occur. Re-measurement recognized in other comprehensive income is reflected immediately in retained earnings and will not be reclassified to Statement of Profit or Loss and any change due to plan amendment, curtailment and settlement is considered for determining the current service cost, net interest, past service cost or gain/loss for settlement etc.
- ii. Provision for post-retirement medical benefit is made on defined contribution basis.
- iii. Provident fund contribution is made to Provident Fund Trust on accrual basis.
- iv. Payment of Ex-gratia and Notice pay on Voluntary Retirement are charged to revenue in the year incurred.
- v. Superannuation Pension Benefit, a defined contribution scheme is administered by Life Insurance Corporation of India (LIC). The Company makes contributions based on a specified percentage of each eligible employee's salary.

Short-term employee benefit obligations

Short-term employee benefit obligations are measured on an undiscounted basis and are recorded as expense as the related service is provided. A liability is recognized for the amount expected to be paid under PRP Scheme, if the Company has a present legal or constructive obligation to pay this amount as a result of past service provided by the employee and the obligation can be estimated reliably.

2.17 Taxation

Income tax expense represents the sum of the tax currently payable and deferred tax.

Current tax

The tax currently payable is based on taxable profit for the year. Taxable profit differs from 'profit before tax' as reported in the statement of profit or loss and other comprehensive income/statement of profit or loss because of items of income or expense that are taxable or deductible in other years and items that are never taxable or deductible. The Company's current tax is calculated using tax rates that have been enacted or substantively enacted by the end of the reporting period.

Deferred tax

Deferred tax is recognized on temporary differences between the carrying amounts of assets and liabilities in the financial statements and the corresponding tax bases used in the computation of taxable profit. Deferred tax liabilities are generally recognized for all taxable temporary differences. Deferred tax assets are generally recognized for all deductible temporary differences to the extent that it is probable that taxable profits will be available against which those deductible temporary differences can be utilized. Such deferred tax assets and liabilities are not recognized if the temporary difference arises from the initial recognition (other than in a business combination) of assets and liabilities in a transaction that affects neither the taxable profit nor the accounting profit. In addition, deferred tax liabilities are not recognized if the temporary difference arises from the initial recognition of goodwill.

Deferred tax liabilities are recognized for taxable temporary differences associated with investments in subsidiaries and associates, and interests in joint ventures, except where the company is able to control the reversal of the temporary difference and it is probable that the temporary difference will not reverse in the foreseeable future. Deferred tax assets arising from deductible temporary differences associated with such investments and interests are only recognized to the extent that it is probable that there will be sufficient taxable profits against which to utilize the benefits of the temporary differences and they are expected to reverse in the foreseeable future.

The carrying amount of deferred tax assets is reviewed at the end of each reporting period and reduced to the extent that it is no longer probable that sufficient taxable profits will be available to allow all or part of the asset to be recovered.

Deferred tax liabilities and assets are measured at the tax rates that are expected to apply in the period in which the liability is settled or the asset realised, based on tax rates (and tax laws) that have been enacted or substantively enacted by the end of the reporting period.

Current and deferred tax for the year

Current and deferred tax are recognized in profit or loss, except when they relate to items that are recognized in other comprehensive income or directly in equity, in which case, the current and deferred tax are also recognized in other comprehensive income or directly in equity respectively. Where current tax or deferred tax arises from the initial accounting for a business combination, the tax effect is included in the accounting for the business combination.

Dividend Distribution Tax

Company is recognising the dividend distribution tax payable on payment of dividend under other equity since the dividend payable consequent upon approval of shareholders in Annual General Meeting is also presented under other equity.

Uncertainty over income tax treatments

Company while determining taxable profit (or loss), tax bases, unused tax losses, unused tax credits and tax rates, when there is uncertainty over income tax treatments under Ind AS 12 company is considering the probability of accepting the same treatment by income tax authorities and any change due to this adjusted retrospectively with cumulative effect by adjusting equity on initial application without adjusting comparatives.

2.18 Investment Property

Investment properties are properties held to earn rentals and/or for capital appreciation (including property under construction for such purposes). Investment properties are measured initially at cost, including transaction costs. All of the Company's property interests held under operating leases to earn rentals or for capital appreciation purposes are accounted for as investment properties. After initial recognition, the company measures investment property at cost.

An investment property is derecognized upon disposal or when the investment property is permanently withdrawn from use and no future economic benefits are expected from the disposal. Any gain or loss arising on de recognition of the property (calculated as the difference between the net disposal proceeds and the carrying amount of the asset) is included in profit or loss in the period in which the property is derecognized.

Investment properties are depreciated in accordance to the class of asset that it belongs and the life of the asset is as conceived for the same class of asset at the Company.

2.19 Earnings per share

A basic earnings per equity is computed by dividing the net profit attributable to the equity holders of the company by the weighted average number of equity shares outstanding during the period. Diluted earnings per



equity share is computed by dividing the net profit attributable to the equity holders of the company by the weighted average number of equity shares considered for deriving basic earnings per equity share and also the weighted average number of equity shares that could have been issued upon conversion of all dilutive potential equity shares. The dilutive potential equity shares are adjusted for the proceeds receivable had the equity shares been actually issued at fair value (i.e. the average market value of the outstanding equity shares). Dilutive potential equity shares are deemed converted as of the beginning of the period, unless issued at a later date. Dilutive potential equity shares are determined independently for each period presented.

The number of equity shares and potentially dilutive equity shares are adjusted retrospectively for all periods presented for any shares splits and bonus shares issues including for changes effected prior to the approval of the financial statements by the Board of Directors.

2.20 Discontinued operations

A discontinued operation is a component of the Company's business that represents a separate line of business that has been disposed off or is held for sale, or is a subsidiary acquired exclusively with a view to resale. Classification as a discontinued operation occurs upon the earlier of disposal or when the operation meets the criteria to be classified as held for sale.

2.21 Financial instruments

i) Non-derivative financial instruments

Non-derivative financial instruments consist of:

- financial assets, which include cash and cash equivalents, trade receivables, unbilled revenues, finance lease receivables, employee and other advances, investments in equity and debt securities and eligible current and non-current assets;
- Financial liabilities, which include long and short-term loans and borrowings, bank overdrafts, trade payables, eligible current and non-current liabilities.

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

Non derivative financial instruments are recognized initially at fair value including any directly attributable transaction costs. Financial assets are derecognized when substantial risks and rewards of ownership of the financial asset have been transferred. In cases where substantial risks and rewards of ownership of the financial assets are neither transferred nor retained, financial assets are derecognized only when the Company has not retained control over the financial asset.

Subsequent to initial recognition, non-derivative financial instruments are measured as described below:

a) Cash and cash equivalents

For the purposes of the cash flow statement, cash and cash equivalents include cash in hand, at banks and demand deposits with banks, net of outstanding bank overdrafts that are repayable on demand and are considered part of the Company's cash management system. In the statement of financial position, bank overdrafts are presented under borrowings within current liabilities.

b) Investments in liquid mutual funds, equity securities (other than Subsidiaries, Joint Venture and Associates) are valued at their fair value. These investments are measured at fair value and changes therein, other than impairment losses, are recognized in other comprehensive income and presented within equity, net of taxes. The impairment losses, if any, are reclassified from equity into statement of income. When an available for sale financial asset is derecognized, the related cumulative gain or loss recognised in equity is transferred to the statement of income.

c) Loans and receivables

Loans and receivables are non-derivative financial assets with fixed or determinable payments that are not quoted in an active market. They are presented as current assets, except for those maturing later than 12 months after the reporting date which are presented as non-current assets. Loans and receivables are initially recognized at fair value plus directly attributable transaction costs and subsequently measured at amortized cost using the effective interest method, less any impairment losses. Loans and receivables comprise trade receivables, unbilled revenues and other assets.

The company estimates the un-collectability of accounts receivable by analysing historical payment patterns, customer concentrations, customer credit-worthiness and current economic trends. If the financial condition of a customer deteriorates, additional allowances may be required.

d) Trade and other payables

Trade and other payables are initially recognized at fair value, and subsequently carried at amortized cost using the effective interest method. For these financial instruments, the carrying amounts approximate fair value due to the short term maturity of these instruments.

e) Investments in Subsidiary, Associates and Joint Venture

The company accounts investment in subsidiary, joint ventures and associates at cost

An entity controlled by the company is considered as a subsidiary of the company.

Investments in subsidiary company outside India are translated at the rate of exchange prevailing on the date of acquisition.

Investments where the company has significant influence are classified as associates. Significant influence is the power to participate in the financial and operating policy decisions of the investee but is not control or joint control over those policies.

A joint arrangement whereby the parties that have joint control of the arrangement have rights to the net assets of the joint arrangement is classified as a joint venture. Joint control is the contractually agreed sharing of control of an arrangement, which exists only when decisions about the relevant activities require unanimous consent of the parties sharing control.

ii) *Derivative financial instruments*

The Company is exposed to foreign currency fluctuations on foreign currency assets, liabilities, net investment in foreign operations and forecasted cash flows denominated in foreign currency.

The Company limits the effect of foreign exchange rate fluctuations by following established risk management policies including the use of derivatives. The Company enters into derivative financial instruments where the counterparty is primarily a bank.

Derivatives are recognized and measured at fair value. Attributable transaction costs are recognized in statement of income as cost.

Subsequent to initial recognition, derivative financial instruments are measured as described below:

a) Cash flow hedges

In respect of firm commitments and forecast transactions changes in the fair value of the derivative hedging instrument designated as a cash flow hedge are recognized in other comprehensive income and held in cash flow hedging reserve, net of taxes, a component of equity, to the extent that the hedge is effective. To the extent that the hedge is ineffective, changes in fair value are recognized in the statement of profit and loss and reported within foreign exchange gains/ (losses), net within results from operating activities. If the hedging instrument no longer meets the criteria for hedge accounting, then hedge accounting is discontinued prospectively. The cumulative gain or loss previously recognized in the cash flow hedging reserve is transferred to the statement of profit and loss upon the occurrence of the related forecasted transaction. If the forecasted transaction is no longer expected to occur, such cumulative balance is immediately recognized in the statement of profit and loss.

b) Others

Changes in fair value of foreign currency derivative instruments neither designated as cash flow hedges nor hedges of net investment in foreign operations are recognized in the statement of income and reported within foreign exchange gains/ (losses), net within results from operating activities.

Changes in fair value and gains/ (losses) on settlement of foreign currency derivative instruments relating to borrowings, which have not been designated as hedges are recorded in finance expenses.

2.22 Segment Information

The Chairman and Managing Director (CMD) of the Company has been identified as the Chief Operating Decision Maker (CODM) as defined by Ind AS-108, "Operating Segments." The CMD of the Company evaluates the segments based on their revenue growth and operating income.

The Company has identified its Operating Segments as Minerals, Precious Metals, Metals, Agro Products, Coal & Hydrocarbon, Fertilizer and General Trade/others.

The Assets and liabilities used in the Company's business that are not identified to any of the operating segments are shown as unallocable assets/liabilities. Management believes that it is currently not practicable to provide segment disclosures relating to total assets and liabilities since the assets are used interchangeably and hence a meaningful segregation of the available data is onerous.

2.23 Prior Period Errors

Errors of material amount relating to prior period(s) are disclosed by a note with nature of prior period errors, amount of correction of each such prior period presented retrospectively, to the extent practicable along with change in basic and diluted earnings per share. However, where retrospective restatement is not practicable for a particular period then the circumstances that lead to the existence of that condition and the description of how and from where the error is corrected are disclosed in Notes to Accounts. Taking into account the nature of activities of the company, prior period errors are considered material if the items of income / expenditure collectively (net) exceed 0.5% of sales turnover of the company.



Notes to accounts for the year ended March 31, 2022

3. Property, Plant and Equipment

Particulars	(₹ in crore)									
	Gross carrying value as at April 1, 2021	Additions	Disposal/ adjustments	Gross carrying value as at March 31, 2022	Accumulated depreciation as at April 1, 2021	Additions/ Impairment	Disposal/ adjustments	Accumulated depreciation as at March 31, 2022	Net Carrying Value as at March 31, 2022	Net Carrying Value as at March 31, 2021
Land freehold										
- Office building	0.37	-	-	0.37	-	-	-	-	0.37	0.37
- Staff Quarters	0.13	-	-	0.13	-	-	-	-	0.13	0.13
Land leasehold										
- Office building	1.07	-	-	1.07	0.11	0.02	-	0.13	0.94	0.96
- Staff Quarters	1.85	-	-	1.85	0.78	0.22	-	1.00	0.85	1.07
Building										
- Office Building	6.45	-	-	6.45	0.94	0.16	-	1.10	5.34	5.51
- Staff Quarters/Residential Flats	1.21	0.03	-	1.24	0.22	0.04	-	0.26	0.99	0.99
- Water supply, Sewerage & Drainage	0.06	-	-	0.06	0.05	0.00	-	0.05	0.01	0.01
-Electrical Installations	3.07	-	-	3.07	1.95	0.06	-	2.01	1.06	1.12
-Roads & Culverts	0.02	-	-	0.02	0.02	0.00	-	0.02	0.01	0.01
- Audio/Fire/Airconditioning	0.06	-	-	0.06	0.05	0.00	-	0.06	0.00	0.01
Plant & Equipment	40.60	-	(0.01)	40.59	17.85	2.89	(0.01)	20.73	19.86	22.75
Furniture & Fixtures										
- Partitions	0.39	-	(0.00)	0.38	0.36	0.01	(0.00)	0.36	0.02	0.03
- Others	1.48	-	(0.02)	1.47	0.69	0.14	(0.01)	0.82	0.65	0.80
Vehicles	0.48	-	-	0.48	0.28	0.06	0.00	0.34	0.14	0.20
Office Equipments	1.81	0.02	(0.11)	1.71	1.58	0.13	(0.12)	1.59	0.12	0.23
Others:-										
- Railway Wagon Rakes	0.00	-	-	0.00	0.00	-	-	0.00	0.00	0.00
- Railway Loop Line at BNHT	0.00	-	-	0.00	-	-	-	-	0.00	0.00
- Computer/ Data Processors	2.29	0.00	(0.02)	2.28	2.07	0.14	(0.01)	2.20	0.08	0.23
Total	61.34	0.05	(0.16)	61.23	26.95	3.87	(0.16)	30.66	30.57	34.39
Last Year	62.23	0.21	(1.10)	61.34	23.58	4.07	(0.71)	26.95	34.39	
Right to Use Assets	5.06	0.01	-	5.07	1.71	0.39	-	2.10	2.97	3.35
Last Year	6.07	0.14	(1.15)	5.06	1.60	0.42	(0.30)	1.71	3.35	
Capital Work in Progress	-	-	-	-	-	-	-	-	-	-
Last Year	-	-	-	-	-	-	-	-	-	-

(a) Leasehold lands, roads and culverts, sewerage, drainage and water supply for staff quarters at Delhi includes those held jointly with STC Limited earlier on 50:50 basis. However, during 2018-19, the company has obtained execution of separate lease deed for 16.16 acre land from DDA towards its share.

(b) During the year, the company assessed the impairment loss of assets and accordingly provision towards impairment in the value of PPE amounting to ₹ Nil crore (P.Y. ₹ Nil crore) has been made during the year.

(c) The original title papers of the 36 properties of MMTC valuing ₹ 1515.96 crore (as per valuation report 2021) are deposited with Registrar General, Hon'ble Delhi High Court based on directions passed by it vide order dated 22.04.2019 and 22.05.2019.

(d) Refer note no. 47.

4. Investment Property

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Gross carrying value as at beginning of the year	4.88	4.88
Additions	-	-
Disposal/adjustments	-	-
Gross carrying value as at end of the year	4.88	4.88
Accumulated depreciation as at beginning of the year	1.00	0.84
Additions	0.16	0.16
Accumulated depreciation as at end of the year	1.17	1.00
Net Carrying Value as at end of the year	3.71	3.88

Amounts recognised in profit or loss for investment properties

(₹ in crores)

Particulars	March 31, 2022	March 31, 2021
Rental income	1.50	1.50
Profit from investment properties before depreciation	1.50	1.50
Depreciation	0.08	0.08
Profit from investment properties	1.42	1.42

leasing arrangements

Certain investment properties are leased to tenants under long-term operating leases with rentals payable monthly. Minimum lease payments receivable under non-cancellable operating leases of investment properties are as follows

(₹ in crores)

Particulars	March 31, 2022	March 31, 2021
Within one year	1.81	-
Later than one year but not later than five year	2.50	-
Later than five year	2.15	-
Total	6.46	0.00

Estimation of fair value

The investment properties have been measured following cost model. The fair values of investment properties determined by independent valuer is ₹ 110.15 crore (P.Y. ₹ 107.63 crore)

5. Other Intangible Assets

(₹ in crore)

Particulars	Gross carrying value as at April 1, 2021	Additions	Disposal/adjustments	Gross carrying value as at March 31, 2022	Accumulated depreciation as at April 1, 2021	Additions	Disposal/adjustments	Accumulated depreciation as at March 31, 2022	Net Carrying Value as at March 31, 2022	Net Carrying Value as at March 31, 2021
Computer Softwares	4.23	-	-	4.23	3.85	0.15	-	4.00	0.24	0.39
Last Year	4.11	0.13	-	4.23	3.55	0.29	-	3.84	0.39	



6. Investments

(₹ in crores)

Particulars	As at March 31, 2022		As at March 31, 2021	
A. NON-CURRENT INVESTMENTS				
a) Investments in Equity Instruments at amortized cost				
i) Subsidiaries				
Unquoted				
MMTC Transnational Pte. Ltd. 1461502 (P.Y. 1461502) fully paid up equity shares of S\$ 1 each.		3.14		3.14
ii) Joint Ventures				
Unquoted				
MMTC Gitanjali Limited. 2987400(P.Y. 2987400) fully paid up equity shares of ₹10 each.	2.99		2.99	
Add/(Less): impairment in value of investment	(2.99)	0.00	(2.99)	0.00
Free Trade Warehousing Pvt. Ltd. 5000(P.Y. 5000) fully paid up equity shares of ₹10 each.	0.01			0.01
Add/(Less): impairment in value of investment	(0.01)	0.00		
MMTC Pamp India Pvt. Limited.17446000(P.Y. 17446000) fully paid up equity shares of ₹10 each.		17.45		17.45
iii) Others				
Fair value through other comprehensive income				
Quoted				
Bombay Stock Exchange Limited. 116883 (P.Y. 38961) fully paid up equity shares of ₹2 each.	3.00		3.00	
Add/(Less): Fair Value Adjustment through Other Comprehensive Income	8.03	11.03	(0.77)	2.23
Amortized cost				
Unquoted				
Indo French Biotech Limited. 4750000(P.Y. 4750000) fully paid up equity shares of ₹10 each.	4.75		4.75	
Add/(Less): impairment in value of investment	(4.75)	0.00	(4.75)	0.00
Total Investments in Equity Instruments		31.62		22.83

* During the year Bombay Stock Exchange (BSE) issued Bonus Share in the ration 2:1, accordingly number of shares increased to 116883 (P.Y. 38961).

(₹ in crores)

Total Non-Current Investments (Gross)	As at March 31, 2022		As at March 31, 2021	
	Aggregate Amount	Market Value	Aggregate Amount	Market Value
Aggregate amount of quoted investments and market value there of	3.00	11.03	3.00	2.23
Aggregate amount of unquoted investments	28.33	-	28.33	-
Aggregate amount of impairment in the value of investments	7.74	-	7.74	-

Particulars	As at March 31, 2022		As at March 31, 2021	
B. CURRENT INVESTMENTS	-	-	-	-

Particulars	As at March 31, 2022		As at March 31, 2021	
6 C. NON-CURRENT INVESTMENTS HELD FOR SALE				
a) Investments in Equity Instruments at amortized cost				
Joint Ventures				
Unquoted				
Neelachal Ispat Nigam Limited. 368762744 (PY 368762744) fully paid up equity shares of ₹10 each.		459.11		459.11
Sical Iron Ore Terminal Limited. 33800000 (PY 33800000) fully paid up equity shares of ₹10 each.	33.80		33.80	
Add/(Less): Fair Value Adjustment through Profit & Loss	(33.80)	-	(33.80)	-
Others				
Fair value through other comprehensive income				
Unquoted				
Indian Commodity Exchange Limited. 32000000 (PY 32000000) fully paid up equity shares of ₹5 each	16.00		16.00	
Add/(Less): Fair Value Adjustment through Other Comprehensive Income	(16.00)	-	(8.16)	7.84
Total Investments held for sale		459.11		466.95

- All Non-Current Investments in Equity Instruments of Subsidiaries and Joint Ventures are carried at cost less impairment in value of investment, if any. The Investment in Equity Instruments of others are carried at Fair Value.
- The Company had invested ₹ 33.80 crore (P.Y ₹ 33.80 crore) towards 26% equity in SICAL Iron Ore Terminal Limited (SIOTL), a Joint Venture for the construction and operation of iron ore terminal at Kamrajar Port. The construction of terminal was completed by November 2010, the same could not be commissioned due to restrictions on mining, transportation and export of iron ore. After due tender process, Kamrajar Port Ltd (KPL) has allowed to SIOTL for necessary modifications to also handle common user coal. MMTC's Board of Directors during its 428th meeting held on 14.09.16 approved MMTC's exit through open tender mechanism from the JV. Accordingly, bids were invited from interested bidders for sale of MMTC's equity. No bids were received in the tender process. However, the lead promoter (i.e. M/s Sical Logistics Ltd) has agreed to buy MMTC's equity at the reserve price of ₹ 34.26 crore. Accordingly, the Share Purchase Agreement (SPA) has been signed and in terms of the agreement M/s SICAL Logistics Ltd have deposited ₹ 0.50 crore with MMTC towards performance of the Agreement. As per terms of SPA, M/s SIOTL applied to M/s Kamrajar Port Ltd for NOC/Permission of MMTC's exit from the JV. The NOC was received in Oct 2019. However, balance payment has not been received so far. Keeping in view the delay in receipt of share purchase value from M/s SICAL Logistics Ltd and financial distress of M/s Sical Logistics Ltd, a provision has been created for ₹ 33.80 crore towards impairment in value of investment on SIOTL. Accordingly the investment has been shown as 'held for sale'.

KPL issued notice of intent to terminate to SIOTL on 21.12.2020. The company file a writ petition on 24.06.2021 in Madras High Court against the termination notice issued by KPL. Vide order dated 30.11.2021, this petition has been dismissed by the Hon'ble Madras High Court on the ground that writ is not maintainable before the court. MMTC has filed an appeal before Hon'ble Madras High Court challenging the impugned judgement order dated 30.11.2021. Possibility of taking this matter to AMRCD and other options available for realisation of investment amount, is being explored. In the meantime, M/s Sical Logistics Limited holding company of SIOTL was undergoing Corporate Insolvency Resolution Process (CIRP). The Company (MMTC) lodged its claim of ₹ 34.26 crore with CIRP of Sical Logistics. To safeguard the investment in SIOTL, M/s SICAL Logistics had moved a similar application being IA/574/Che/2021 in main CIRP proceedings being IBA/73/2020. To ensure that no adverse order is passed in these proceedings, MMTC filed an application being IA/686/Che/2021 for being impleaded as a party and to be heard before any order is passed. Vide order dated 11.03.2022, NCLT Chennai dismissed SICAL's IA/574/Che/2021 for want of Jurisdiction. Accordingly, MMTC's application being IA/686/Che/2021 in IA/574/Che/2021 stands closed. M/s SIOTL's two creditors (1. M/s Portman India Private Limited, Chennai 2. M/s ITD Cementation India Limited, Mumbai) initiated corporate insolvency resolution process against SIOTL in NCLT under Insolvency and Bankruptcy Code 2016. Vide order dated 01.03.2022, NCLT Chennai has admitted their applications and have appointed same IRP for both cases.



- iii. Government of India has accorded 'in principle' approval for divestment of 100 % equity of MMTC in NINL. The process of divestment is underway through DIPAM. Accordingly, the investment has been shown as investment 'held for sale'.
- iv. MMTC had invested ₹ 26 crore (5.20 crore equity share of ₹ 5 Face value) during 2009-10 in ICEX. ICEX Initial equity capital was ₹ 100 crore that was later on increased to ₹ 266.75 crore. However later on MMTC divested 2 crore share @ ₹ 10 per share in 2015-16. After this divestment MMTC's shareholding reduced to ₹ 16 crore (3.20 crore share @ ₹ 5 Face value) which is 6% of the total share capital of ₹ 266.75 crore. Later on due to erosion of Net worth of ICEX MMTC provided Fair value Adjustment of ₹ 8.16 crore and ₹ 7.84 crore in 2019-20 and 2021-22 respectively. After such adjustment share value in the books of accounts stands to ₹ Nil crore as on 31.03.2022 (P.Y. ₹ 7.84 crore).

The equity shares of ICEX are not listed at any stock exchange in India as on 31.03.2022. MMTC has invited Request for Proposal (RFP) for divestment of 6% equity in ICEX and accordingly the investment has been shown as 'held for sale' as on 31.3.2022.

SEBI had granted the additional timeline till December 31, 2021 to comply with the shareholding limits as per SECC Regulations, 2018. MMTC has requested SEBI to extend the time for compliance of SECC Regulations, however, response is awaited. SEBI passed order dated 10.05.2022 for withdrawal of recognition to Indian Commodity Exchange Ltd. and published in the official gazette of India on 18.05.2022. However, Securities Appellate Tribunal (SAT), by its order dated 13 June 2022 has Quashed SEBI order derecognizing ICEX.

7. Trade Receivable

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Other Trade Receivables		
a) Considered Good - Secured	102.47	538.22
b) Considered good - Unsecured	32.63	17.47
c) Which have significant increase in Credit Risk	-	-
d) Credit impaired	390.12	390.02
Less : Allowances for bad and doubtful debts	390.12	390.02
Sub-Total	135.10	555.69
Total	135.10	555.69
NON-CURRENT (A)	-	-
CURRENT (B)	135.10	555.69
TOTAL	135.10	555.69

Out of the above, amount due by directors or other officers of the company or any of them either severally or jointly with any other person or amounts due by firms or private companies respectively in which any director is a partner or a director or a member is ₹ Nil crore (P.Y. ₹ Nil crore).

Refer note no. 37.3 (b) for ageing.

Movement in allowances for bad & doubtful debt:

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Balance at the beginning of the year	390.02	388.97
Additions during the year	0.10	1.06
Reversals during the year	-	-
Utilisations during the year	-	-
Balance at the end of the year	390.12	390.02

8. Loans

(₹ in crores)

Particulars	As at March 31, 2022		As at March 31, 2021	
	CURRENT	NON-CURRENT	CURRENT	NON-CURRENT
<i>Considered good - Secured</i>				
Loans to Related Parties	-	-	-	-
Loans to Employees*	0.51	1.90	0.62	2.57
Others	-	-	-	-
Sub- Total	0.51	1.90	0.62	2.57
<i>Considered good - Unsecured</i>				
Loans to Related Parties	-	-	-	0.00
Loans to Employees	0.49	0.38	0.74	0.92
Others	-	-	-	0.00
Sub- Total	0.49	0.38	0.74	0.93
<i>Credit impaired</i>				
Loans to Related Parties	-	-	-	-
Loans to Employees	-	-	-	-
Others	0.03	0.14	0.03	0.14
Less: Allowance for bad and doubtful loans	0.03	0.14	0.03	0.14
Sub- Total	-	-	-	-
Total	1.00	2.28	1.36	3.50

Out of the above, amount due by directors or other officers of the company or any of them either severally or jointly with any other person or amounts due by firms or private companies respectively in which any director is a partner or a director or a member is ₹ Nil crore (P.Y. ₹ Nil Crore).

* Secured by hypothecation/undertaking of property and other assets of employees.



9. Other Financial Assets

(₹ in crores)

Particulars	As at March 31, 2022		As at March 31, 2021	
	CURRENT	NON-CURRENT	CURRENT	NON-CURRENT
Bank Deposits with more than 12 months maturity	-	11.39	-	13.12
Balance with bank for Unpaid Dividend	-	0.19	-	0.22
Receivable From NSEL (i)	-	208.25	-	208.25
Demurrage and Dispatch receivable	4.40	6.42	5.00	6.26
Forward Contract Receivable	-	-	-	-
Advances to other Companies (ii)	-	33.53	-	33.53
Others	1.85	8.98	(0.05)	8.79
Security Deposits	4.00	2.13	20.82	2.15
Interest accrued due/not due on:				
-Term Deposits	0.38	-	1.41	-
-Loans to Employees	0.58	6.20	0.55	7.10
-Loans to Related Parties	-	-	-	-
-Loans to Others	-	2.25	0.02	2.25
Others	-	9.90	-	9.90
Less: Impairment / Allowances for bad and Doubtful Receivables	2.39	243.88	1.13	244.09
Total	8.82	45.36	26.62	47.47

- (i) Represents ₹ 208.25 crore (P.Y. ₹ 208.25 crore) recoverable from various borrowers and National Spot Exchange (NSEL) arising on account of default of payment obligation of NSEL against which full provision has already been made. The Company has filed legal suit in Bombay High Court against NSEL and others and hearings are in progress. CBI also investigated the case. The Hon'ble Supreme Court of India has set aside the order of amalgamation of NSEL with FTIL. Further, Hon'ble Supreme Court has allowed the appeal filed by State of Maharashtra and held that the notifications issued under Section 4 of the MPID Act attaching the properties of the 63 Moons Technologies Ltd are valid. The suit filed by company has been tagged with the Suit No.121 of 2014 filed by L.J. Tanna Shares and Securities which has not come up for hearings as per the CMIS systems of the Hon'ble Bombay High Court in regular course. The next date of hearing is awaited.
- (ii) During the year a provision of ₹ Nil crore (P.Y. ₹ Nil crore) has been made against advance for project development to HFTWPL & KFTWPL. Total Provision as on 31.03.2022 is ₹ 16.30 crore (P.Y. ₹ 16.30 crore).

10. Deferred Tax Assets

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Deferred Tax Liability		
Property, plant and equipment	(6.99)	(7.83)
Sub Total	(6.99)	(7.83)
Deferred tax Assets		
Prov. For Doubtful Debts	233.30	233.27
DWA Risk	-	0.02
VRS Expenses	-	3.03
Provision for CSR	-	-
Carried Forward Tax Losses*	-	330.69
Provision for Employee Benefit Expense	(11.90)	(3.74)
Sub Total	221.40	563.27
Deferred tax Assets (net)	214.41	555.44

Deferred Tax assets have been recognised to the extent of expected utilisation against probable future taxable income of the company.

* Deferred Tax Assets amounting to ₹ 330.69 crore was created during the previous year 2020-21 on losses limited to probable interest proceeds from FY 2019-20 to 2021-22 to be realised through divestment proceeds from NINL. Considering the certainty of realisation of interest proceeds from NINL for FY 2019-20 & 2020-21, the interest for FY 2019-20 & 2020-21 has been booked in current year on the basis of waterfall agreement signed and subsequent directives. Hence, Deferred Tax Assets of ₹ 330.69 crore created earlier has been reversed.

Further, the Company has not recognised Deferred Tax Assets on carry forward losses arising during the Current as well as previous financial years on conservative basis keeping in view of the uncertainties involved.

Movement in deferred tax balances during the year

(₹ in crores)

Particulars	Balance As at March 31 2021	Recognised in Profit and Loss	Adjustments	Balance As at March 31 2022
Deferred Tax Liability				
Property plant and equipment	(7.83)	0.84	-	(6.99)
Sub Total	(7.83)	0.84	-	(6.99)
Deferred Tax Assets				
Provisions for Bad & Doubtful Debts	233.27	0.03	-	233.30
Prov. for DWA Risk	0.02	(0.02)	-	0.00
VRS Expenses	3.03	(3.03)	-	0.00
Carried Forward Tax Losses	330.69	(330.69)	-	0.00
Provision for Employee Benefit Expense	(3.74)	(8.16)	-	(11.90)
Sub Total	563.27	(341.87)	-	221.40
Total	555.44	(341.03)	-	214.41

Recognised Deferred tax assets

Deferred tax assets have been recognised in respect of the following items

(₹ in crores)

Particulars	As at March 31 2022	As at March 31 2021
Deductible temporary differences	214.41	555.44
Total	214.41	555.44

Deferred tax assets and deferred tax liabilities have been offset as they relate to the same governing laws.

11A Other Assets

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
A. Non-Current		
Advances other than Capital Advances		
- Advances to other Suppliers	4.79	4.67
- Other Advances	17.03	17.12
Allowances for bad and Doubtful Advance	(18.27)	(18.18)
Others		
- Income Tax paid recoverable*	20.45	20.94
- Others	0.04	0.04
Total	24.04	24.59
B. Current		
Advances other than Capital Advances		
-Advances to Related Parties**	1,425.00	1,425.01
-Trade Related Advance to Related Parties**	2,038.11	2,103.47
- Interest accrued realisability uncertain	-	(547.87)
- Advances to other Suppliers	0.79	8.38
- Claim Recoverable Others	167.03	165.44
-Gold/Silver stock towards unbilled purchases	24.96	294.50
- Other Advances	15.30	15.41
Allowances for bad and Doubtful Advance	(3.36)	(3.36)
Others		
- Income Tax refund due	3.51	11.12
- Sales Tax refund due	14.48	13.75
- Excise/Custom duty refund due	4.68	4.68
- Service Tax refund due	0.53	0.40
-Others	18.48	55.17
Total	3,709.51	3,546.10

*Includes ₹ 14.68 crore (P.Y. ₹ 20.45 crore) is under dispute (refer note no. 34 (i) (b))

** Includes amount of ₹ 547.87 crore related to interest recoverable recognised on divestment of NINL (refer note 36 (c)).



12. Inventories

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Raw Materials	5.09	5.83
Finished Goods	20.66	22.25
Stock in trade (includes goods in transit valued at ₹ Nil crore (P.Y. ₹ 2.68 crore)	3.65	13.82
Others - Inventory Hedge Adjustment	0.39	3.74
Total	29.79	45.64

- a) As taken, valued and certified by the management.
- b) Inventories including goods in transit are valued at lower of the cost or realizable value as on 31st March 2022. Valuation of closing stock at market price being lower than cost, has resulted in a loss of ₹ 0.01 crores (P.Y. ₹ 1.59 crores).
- c) Stock-in-trade includes the following:
- (i) 9036 units (P.Y. 9036 units) Certified Emission Reductions (CERs) valued at ₹ 1 (P.Y. ₹ 1) as per Ind AS-2 'Inventories', being lower of cost or net realizable value.
- (ii) Nil units (P.Y. Nil units) number of CERs under certification.
- (iii) An amount of ₹ 5.30 crore (P.Y. ₹ 4.91 crore) has been spent on account of Depreciation, O&M cost of Emission Reduction equipment.
- d) Stock in Trade includes an inventory of ₹ Nil (P.Y. ₹ Nil) valued at cost relating to onion imported under Price Stabilization Scheme of the Government of India to create Buffer Stock of onion. (Refer note no. 36(e)).

13. Cash & Cash Equivalents

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Balances with Banks		
(a) in Current Account	6.76	40.64
(b) In term deposit with original maturity upto 3 months	15.57	57.92
(c) Debit balance in Cash Credit Account	20.96	33.99
Cheques / Drafts / Stamps on hand	0.00	0.00
Cash on hand	0.07	0.16
Total	43.36	132.71

14. Bank Balances other than above

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
As Margin money/under lien	16.67	23.22
In term deposit with original maturity more than 3 months but less than 12 months	0.79	9.99
Total	17.46	33.21

15. Current tax Assets (Net)

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Advance tax paid/TDS Recoverable for the FY 2021-22	3.61	
Advance tax paid/TDS Recoverable for the FY 2020-21	-	2.64
Total	3.61	2.64

16.A. Equity Shares Capital

(₹ in crores)

Particulars	As at March 31, 2022		As at March 31, 2021	
	Number	Amount	Number	Amount
Authorized				
Ordinary shares of par value of ₹ 1/- each				
Number	2,000,000,000		2,000,000,000	
Amount	200.00		200.00	
Issued, subscribed and fully paid				
Ordinary shares of par value of ₹ 1/- each				
Number	1,500,000,000		1,500,000,000	
Amount	150.00		150.00	

Reconciliation of number of shares:

Particulars	As at March 31, 2022	As at March 31, 2021
Opening Equity Shares	1,500,000,000	1,500,000,000
Add : - No. of Shares issued/subscribed during the year	-	-
Less: Deduction	-	-
Closing balance	1,500,000,000	1,500,000,000

No. of Shares in the company held by shareholder holding more than 5 percent

Name of the Shareholder	As at March 31, 2022	As at March 31, 2021
- President of India	1,348,903,143	1,348,903,143

Shareholding of Promoters

Shares held by promoters at the end of the year			% Change during the year
	No. of Shares	% of total shares	
- President of India	1,348,903,143	89.93%	Nil

The Company has one class of share capital, comprising ordinary shares of ₹ 1/- each. Subject to the Company's Articles of Association and applicable law, the Company's ordinary shares confer on the holder the right to receive notice of and vote at general meetings of the Company, the right to receive any surplus assets on a winding-up of the Company, and an entitlement to receive any dividend declared on ordinary shares.

Movements in equity share capital: During the year, the company has not bought back any shares.

The Company does not have any holding company.

During 2018-19, the company has allotted 50 crore equity shares in ratio of 1:2 as fully paid bonus shares by capitalization of free reserves amounting to ₹ 50 crore, pursuant to an ordinary resolution passed after taking consent of shareholders through postal ballot. Accordingly the paid up share capital of the company stands increased to ₹ 150/- crore divided into 150 crore equity share of ₹ 1/-each fully paid.

B. Other Equity

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Research & Development Reserve	-	-
General reserve	596.97	596.97
Retained Earnings	(550.79)	(308.86)
Other Comprehensive Income Reserves	2.78	(15.65)
Total Other Equity	43.40	272.46

(i) Research & Development Reserve

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Opening Balance	-	-
Transfer from surplus	-	-
Transfer to general reserve	-	-
Closing Balance	-	-

(ii) General Reserve

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Opening Balance	596.97	596.97
Transfer from surplus/other reserves	-	-
Transfer to General Reserve	-	-
Closing Balance	596.97	596.97

(iii) Retained Earnings

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Opening Balance	(308.86)	460.83
Net Profit for the year	(241.93)	(769.69)
Appropriations:		
General Reserve	-	-
Closing Balance	(550.79)	(308.86)



(iv) Other Reserve

(₹ in crores)

Particulars	Equity instruments through OCI	Remeasurements - Post Employee Benefit Plans	Total other reserves
As at April 1 2020	(10.00)	(13.65)	(23.65)
Remeasurements of the defined benefit plans	-	6.93	6.93
Equity Instruments through other comprehensive income	1.07	-	1.07
As at March 21 2021	(8.93)	(6.72)	(15.65)
Remeasurements of the defined benefit plans	-	11.90	11.90
Equity Instruments through other comprehensive income Addition / (Deduction)	0.97	-	0.97
As at March 31, 2022	(7.96)	5.18	(2.78)

17. Borrowings

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
A. NON-CURRENT		
(i) Term Loans		
(a) From Banks		
- Secured	-	-
- Unsecured	-	-
Total	-	-
B. CURRENT		
(i) Loans repayable on Demand		
(a) From Banks		
- Secured (against hypothecation of inventories, trade receivables and other current assets present and future)	192.48	185.20
- Unsecured	2,358.96	2,178.81
Total	2,551.44	2,364.01

- The loans have not been guaranteed by any of the director or others.
- The loans have been taken from Banks under Cash Credit/Packing Credit Accounts/Others and are repayable within one year. Interest payable on loan repayable on demand is based on MCLR plus spread of banks.
- The quarterly returns or statements of current assets are filed by the company with banks on the basis of provisional monthly information system prepared for internal purposes.

As per loan restructuring agreements, the due date of loan and interest repayment was 30.03.2022 with a review period of 30 days. Total outstanding bank loan and interest was to be paid in one go on or before 29.04.2022 (30 days review period after 30.03.2022), mainly out of NINL divestment As bank loan along with interest could not be repaid on due date/ review period due to non-receipt of disinvestment proceeds of NINL, MMTC Account with all lender banks has been downgraded to Sub-standard/ NPA w.e.f. 08.06.2021 ie. the date of loan restructuring. Penal provisions are now applicable as per loan restructuring agreements and other legislations. SBI has put all accounts on hold. SBI vide their mail dated 27.04.2022 had already intimated that if payment is not made upto 29.04.2022, MMTC account will be downgraded to Non Performing Asset (NPA). In such a scenario, Bank's guidelines applicable for the NPA accounts will come into force, which includes but not limited to:

- Initiate remedial measures for recovery of the outstanding amount.
- Concession extended, if any, shall be withdrawn and card rate shall be made applicable.
- Reset interest rate to the Card Rate applicable.

The communication in this regard has been sent to Stock Exchanges. A Joint Lender's Meeting was also held on 02.05.2022 and MMTC was allowed business transactions in respect of GMS e-auction. Statutory, utility and other essential payments were also allowed for survival and retaining the status as going concern. It was also mentioned in the minutes of the meeting that the downgrading of account is as per regulatory guidelines of RBI and penal interest/ card rate of respective banks would be applicable. Considering reasonable amount of certainty in realization of NINL disinvestment proceeds, lender banks did not intend to initiate any legal action/ other remedial measures for recovery process as of now.

MMTC has been facing liquidity crisis for long time. MMTC bank limit were exhausted mainly up to 2019-20 including MMTC internal resources for providing working capital/loan to NINL etc. MMTC liabilities at present are frozen on 31.03.2021 as per DIPAM/IMG. As per directives of Board, MMTC requested all lender banks for restructuring of loan in terms of RBI Circular no. RBI/2020-21/16 DOR No.BP/BC/3/21.04.048/2020-21 dated 06.08.2020 for resolution of Covid-19 related stress. The loan resolution plan was approved by all lender banks and was implemented w.e.f. 08.06.2021. Principal amount of loan outstanding as on the date of implementation of resolution plan was ₹ 2272.25 crore. Requisite information and / records were shared with banks and subsequently company and lender banks have signed Master Debt Resolution Agreement (MDRA), Trust and Retention Account Agreement (TRA) and other necessary documents thereto on 08.06.2021. DOC was kept informed about all developments/issues from time to time as required.

Post implementation of loan restructuring, MMTC account remained regular/ standard with all the lender banks. By signing the documents, lenders waived existing event of default and no civil action or proceeding may be invoked under IBC. Under this scheme, the company has got moratorium/ deferment on recovery of interest for credit facilities upto 08.12.2021 for SBI and 31.03.2022 for other banks and for principal upto 31.03.2022 for all banks. MMTC continued to pay Karnataka Bank and started payment to SBI interest from Dec 21/ Jan 22. MMTC was not able to pay bank loans and interest on due date ie.30.03.2022 and further within the review period upto 29.04.2022, due to delay in receipt of NINL proceeds and substantial downsizing of business resulting in negligible trade income. As a consequence, MMTC account with all lender banks downgraded to substandard/ NPA w.e.f.08.06.2021 ie. The date of loan restructuring. MMTC had made several requests in this regard to banks and also informed SEs/DOC/DFS/ DIPAM. Efforts are being made to avoid adverse effects of NPA with requests / meetings with banks. The lender banks allowed statutory, utility and other essential payments and certain business transactions for survival of the company. Considering expected NINL disinvestment proceeds, lender banks did not intend to initiate any legal action/ other remedial measures for recovery process for the time being.

Consequent upon receipts of divestment proceeds from NINL on 4.7.2022 an amount of ₹ 2551.44 crore as on 31.3.2022 have been paid towards principal and normal agreed interest upto 31.3.2022. Further as on 6.7.2022 statement have been obtained and lenders have provided statement with penal interest form 1.4.2022 onwards only but company has paid only normal interest and taking of with lenders for waving of penal interest, processing fee, other extra charges for which company is hopeful of wavier and an amount of ₹ 50.30 crore paid on 6.7.2022 towards interest from 1.4.2022 till 6.7.2022 at normal rate.

18. Trade Payable

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
B. CURRENT		
Trade Payables		
Total outstanding dues of micro and small enterprise (refer note 45)	0.18	0.03
Total outstanding dues of creditors other than micro and small enterprise	269.70	764.20
Trade Payables to Related Parties		
Total outstanding dues of micro and small enterprise (refer note 45)	-	-
Total outstanding dues of creditors other than micro and small enterprise	0.02	0.78
Total	269.90	765.01

Refer note 37.3 (C) for ageing.

19. Lease Liabilities

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
A. NON-CURRENT		
Lease	3.46	3.61
Total	3.46	3.61
B. CURRENT		
Lease	0.13	0.35
Total	0.13	0.35

19 C. Other Financial Liabilities

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
CURRENT		
Payables-Other than trade		
Total outstanding dues of micro and small enterprise (refer note 45)	0.10	-
Total outstanding dues of creditors other than micro and small enterprise	15.70	14.79
Despatch/ Demurrage payable	2.43	3.95
Amount recovered -pending remittance	11.79	8.33
Interest accrued on borrowings	1.99	2.02
Security Deposit &EMD	12.83	43.57
Unpaid Dividend	0.19	0.22
Claims payable	41.40	47.20
Others	132.02	88.39
Total	218.45	208.47



20. Provisions

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
A. NON-CURRENT		
EMPLOYEE BENEFIT OBLIGATIONS		
a) Earned Leave	15.39	13.12
b) Compassionate Gratuity	0.07	0.09
c) Post Retirement Medical Benefit		
Retired/retiring on or after 01.01.2007	(1.02)	5.22
Retired before 01.01.2007	0.05	1.32
d) Half Pay Leave	16.60	16.29
e) Service Award	2.87	3.41
f) Employee's Family Benefit Scheme	2.37	3.11
g) Special benefit to MICA employees	1.07	1.47
Total	37.40	44.03
B. CURRENT		
EMPLOYEE BENEFIT OBLIGATIONS		
a) Earned Leave	3.17	2.89
b) Compassionate Gratuity	0.03	0.03
c) Post Retirement Medical Benefit		
Retired/retiring on or after 01.01.2007	(1.18)	0.28
Retired before 01.01.2007	3.83	2.49
d) Half Pay Leave	3.55	4.30
e) Gratuity	0.15	8.41
f) Service Award	0.71	0.94
g) Bonus/performance related pay	3.25	17.46
h) Employee's Family Benefit Scheme	0.43	0.52
i) Special benefit to MICA employees	0.42	0.38
Sub Total	14.36	37.70
OTHERS		
Destinational weight and analysis risk	-	0.08
Provision for Litigation Settlements*	1,067.39	888.81
Sub Total	1,067.39	888.89
Total	1,081.75	926.59

* Includes amount of ₹1054.87 crore (P.Y. ₹877.43 crore) related to Anglo Coal litigation (refer note 32 (ii)) also this amount is subject to foreign exchange fluctuation.

21. Other Liabilities

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Current		
Advance Received from Customers	352.14	418.68
Statutory dues Payable	6.24	57.92
Amount payable towards unbilled purchases	24.96	294.50
Others	2.20	1.13
Total	385.54	772.23

22. Current tax liabilities (Net)

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Income tax payable for the FY 2021-22	21.50	-
Total	21.50	-

23. Revenue From Operations

(₹ in crores)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Sale of Products	7,836.28	26,361.59
Sale of Services	4.50	2.91
Other Operating Revenue		
- Claims	0.15	25.90
- Despatch Earned	-	-
- Other Trade Income	552.36	(8.79)
Total	8,393.29	26,381.61

24. Other Income

(₹ in crores)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Interest Income		
- From Fixed Deposits	2.93	4.02
- From Customers on amount overdue	0.00	0.15
- Others	1.37	1.05
Dividend Income		
- From Subsidiary/Joint Ventures	37.18	28.64
- From Others	0.08	0.07
Other Non Operating Revenue (Net of expenses directly attributable to such income)		
- Staff Quarters Rent	0.71	0.70
- Liabilities Written Back	9.15	4.38
- Misc. Receipt	3.02	3.18
Total	54.44	42.19

25. Cost of Materials Consumed

(₹ in crores)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Opening stock of Raw Material	5.83	11.31
Add: Transfer from purchases	106.66	70.30
Less: Closing Stock of Raw Material	5.09	6.10
Cost of Material Consumed	107.40	75.51
Consumables	-	-

26. Purchase of Stock-in-Trade

(₹ in crores)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
A. Purchases		
Precious Metal	5,480.78	12,803.89
Metals	27.45	93.41
Fertilizers	1,449.73	9,156.43
Minerals	24.66	1,748.75
Agro Products	72.76	638.80
Coal and Hydrocarbons	200.92	480.81
Others	28.38	26.63
B. Stock Received/(Issued) in kind		
Precious Metals	(0.04)	(0.09)
TOTAL	7,284.64	24,948.63



27. Changes in Inventory

(₹ in crores)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
A. Finished Goods		
Opening Balance	22.25	43.38
Closing Balance	20.67	22.58
Changes in Inventory of Finished Goods	1.58	20.80
B. Stock-In-Trade		
Opening Balance	13.83	155.86
Closing Balance	3.65	14.81
Changes in Inventory of Stock in Trade	10.17	141.05
Net (Increase) /Decrease	11.76	161.85

28. Employees' Benefit Expenses

(₹ in crores)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
a) Salaries and Wages		
Salaries and Allowances	87.68	101.22
Leave Encashment	8.18	7.81
Bonus	0.04	0.05
Medical Expenses	3.09	6.95
Group Insurance	-	0.00
VR Expenses	0.00	0.00
b) Contribution to Provident Fund & Other Funds		
Provident Fund	8.13	8.88
Gratuity Fund	2.01	4.01
Family Pension Scheme	0.73	0.84
Superannuation Benefit	4.06	4.56
c) Staff Welfare Expenses	0.50	0.72
TOTAL	114.42	135.04

- (i) Profit of the company for PRP purpose has been calculated taking into account interest income on trade related advance (other than overdue) as per Accounting Policy no. 2.4 (ii). Pending approval of the Remuneration Committee as mandated in the DPE Guidelines, the PRP advance was made to employees. The order for recovery of above PRP advance from employees is disputed by staff & officers forum and is pending in respective courts.
- (ii) The payment of perks & allowances has been deferred w.e.f. 01.09.2020 in accordance with the decision of FMCOD in its meeting held on 20.10.2020 on the grounds of poor financial health of the company.
- (iii) It is notified vide order No. MMTC/CO/IRP/08/2018 dated 02.05.2018, that the rates of HRA shall be revised to 27%, 18%, 9% and 30%, 20%, 10% (for class X, Y & Z cities) if the IDA crosses 25% and 50% respectively in line with DPE guidelines. Since IDA was revised to 27.2% w.e.f. 01.10.2021, necessitating revision of HRA as mandated.
- (iv) CPF/Pension dues from December 2021 to March 2022 was pending and same has been paid on 5.7.2022.
- (v) MMTC Employees Post-Retirement Medical Benefit Trust, is still not operational. MMTC has been incurring losses and the provisions for loss years i.e., 2019-20 and 2020-21 has been reversed. The decision to fund the PRMBS Trust is under consideration, keeping in view the affordability provision laid down in the DPE order.

29. Finance Cost

(₹ in crores)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
a) Interest Expenses	205.83	197.99
b) Interest Expenses on Lease	0.11	0.49
c) Premium on forward contract	-	-
TOTAL	205.94	198.48

30. Depreciation And Amortization Expenses

(₹ in crores)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Depreciation on PPE	3.94	4.49
Depreciation on Investment Property	0.48	0.16
Amortization of Intangible Assets	0.15	0.29
TOTAL	4.57	4.94

31. Other Expenses

(₹ in crores)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
a. Operating Expenses :		
Freight	-	0.02
Demurrage	(0.05)	0.85
Clearing, Handling, Discount & Other charges	5.63	12.53
L/C negotiation and other charges	0.87	0.59
Difference in foreign exchange	0.10	(7.72)
Customs duty	388.11	1,072.70
Packing Material	0.23	0.17
Insurance	0.00	0.00
Godown insurance	1.10	1.37
Plot and Godown rent	0.01	0.66
Provision for destinational weight and analysis risk	-	0.08
Sub total (a)	396.00	1,081.25
b. Administrative Expenses :		
Rent	0.99	1.31
Security Expenses	2.78	3.41
Rates and taxes	1.89	1.46
Insurance	0.12	0.20
Repairs to buildings	3.37	4.51
Repairs to machinery	0.03	0.02
Repairs & Maintenance- Computers	1.50	1.89
Repairs & Maintenance - Others	0.34	0.35
Electricity & Water Charges	2.49	2.33
Advertisement & Publicity	0.05	0.10
Printing & Stationery	0.20	0.19
Postage & Courier	0.08	0.04
Telephone	0.79	0.82
Telecommunication	0.09	0.33
Travelling	0.33	0.64
Vehicle	0.55	0.90
Entertainment	0.13	0.11
Legal	2.95	4.07
Auditors' Remuneration (i)	0.58	0.57
Bank Charges	15.78	0.60
Books & Periodicals	0.00	0.01
Trade / Sales Promotion	0.15	0.28
Subscription	0.11	0.20
Training, Seminar & Conference	0.00	0.01
Professional/Consultancy	1.35	1.36
CSR Expenditure (ii)	0.05	0.89
Difference in foreign exchange	4.26	(4.22)
Service Tax/GST	1.03	1.93
Exhibition and Fairs	0.11	0.08
Miscellaneous Expenses	4.03	3.89
Sub Total (b)	46.14	28.28
c. Others :		
Bad Debts/Claims/Assets written off/withdrawn	0.02	5.80
Allowance for Bad and Doubtful Debts/claims/advances	1.05	1.06
Sub Total (c)	1.07	6.86
TOTAL (a+b+c)	443.20	1,116.39



i) Amount paid to auditors

(₹ in crores)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
As Auditor	0.31	0.29
For Taxation Matters/Tax Audit	0.13	0.14
For Other Services	0.12	0.13
For Reimbursement of Expenses	0.02	0.01
TOTAL	0.58	0.57

ii) Details of CSR expenditure

(₹ in crore)

	March 31, 2022	March 31, 2021	
a) Gross amount required to be spent by the company (Equivalent to 2% of Average Net Profit during preceding three Years)	-	-	
b) Amount approved by the Board to be spent during the year	-	0.03	
c) Amount spent during the year ending on 31st March 2022:	In Cash	Yet to be paid	Total
		In cash	
(i) Construction/acquisition of any asset	-	-	-
(ii) On purposes other than (i) above	-	-	-
d) Amount spent during the year ending on 31st March 2021:	In Cash	Yet to be paid	Total
		In cash	
(i) Construction/acquisition of any asset	-	-	-
(ii) On purposes other than (i) above	-	-	-
e) Details related to spent / unspent obligations:	March 31, 2022	March 31, 2021	
(i) Contribution to Public Trust	-	0.56	
(ii) Contribution to Charitable Trust	-	-	
(iii) Unspent amount in relation to:			
- Ongoing project	0.05	0.10	
- Other than ongoing project	-	-	

Details of ongoing project and other than ongoing project

Ongoing Project						
Opening Balance		Amount required to be spent during the year	Amount spent during the year		Closing Balance	
With Company	In Separate CSR Unspent A/c		From Company's bank A/c	From Separate CSR Unspent A/c	With Company	In Separate CSR Unspent A/c
-	0.10	0.10	-	0.05	0.05	-

Other than ongoing project

Opening Balance	Amount deposited in Specified Fund of Sch. VII within 6 months	Amount required to be spent during the year	Amount spent during the year	Closing Balance
-	-	-	-	-

Excess amount spent

Opening Balance	Amount required to be spent during the year	Amount spent during the year	Closing Balance
-	-	-	-

32. Exceptional Items

(₹ in crores)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Write-down of inventories to net realisable value and its reversal	0.01	1.59
Disposals of items of assets	(0.04)	(0.24)
Provision for diminution in value of non current investment (i)	0.01	-
Profit on surrender of lease assets	-	(1.13)
Litigation settlements (ii)	178.44	877.25
Provisions no longer required (iii)	(23.22)	(0.30)
TOTAL	155.20	877.17

- (i) Represents provision towards equity investment in Free Trade Warehousing Pvt. Ltd.
- (ii) A provision of ₹ 877.43 crore was made during in FY 2020-21 towards Anglo Coal Liability and further during the year 2021-22 a provision of ₹ 177.44 crore towards pre arbitration interest liability for the period 1.10.2009 to 24.9.2012 and exchange difference has been made as per Hon'ble Supreme Court order dated 29.07.2021. Further developments in respect of the legal case is under :

Thereafter in line with the opinion dated 27.03.2021 of Ld. AG, on disposal of Clarification application dated 19.04.2022, draft Curative Petition prepared by DMD Advocates sent to Ld. ASG for vetting and certification in consonance with direction of Board and DoC. Ld. ASG vetted the draft and the same was referred to Ld. AG through AOR for final settlement before filing. The Ld. AG vide letter dated 29.05.2022 now stated that this is not a fit case for Curative Petition. Copy of AG's letter was forwarded to DoC vide letter dated 08.06.2022. Thereafter the issue was formally taken up with Ld ASG that whether he is still willing for filing the curative petition by giving required certificate. Ld ASG has also declined MMTC curative petition at present.

- (iii) Includes ₹ 13.84 crore PRP provision of 2017-18 and 2018-19 withdrawn during the year as per the directives of BOD.

33. Tax Expense

(₹ in crores)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Current year	21.50	-
Adjustments relating to prior periods	-	0.07
Sub Total (A)	21.50	0.07
Deferred tax expense		
Origination and reversal of temporary differences	341.03	(324.60)
Sub Total (B)	341.03	(324.60)
Total (A+B)	362.53	(324.53)

Tax recognised in other comprehensive income

(₹ in crores)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Defined benefit plan actuarial gains (losses)	-	-
Total	-	-

Reconciliation of effective tax

(₹ in crores)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Profit before tax	120.60	(1,094.22)
Enacted tax Rate	34.94	34.94
Computed Expected Tax Expenses	-	-
Non-deductible expenses	-	-
Tax exempt income/ any other deduction or allowable exp.	-	-
Change in estimates related to prior years	-	-
Deferred Tax	-	-
Tax Expenses for the year	-	-
Adjustment : Tax effect on OCI	-	-
Net Tax Expenses for the year	-	-



34. Contingent Liabilities & Disclosures:

i)

(₹ in crores)

Particulars		As at 31.03.2022	As at 31.03.2021
(I)			
a)	Claims against the company not acknowledged as debts including foreign currency claim	287.17	175.57
b)	Disputed Income Tax Demand against which ₹ 14.68 crore (P.Y. ₹ 20.45 crore) deposited	33.38	42.69
c)	Disputed TDS demands	0.00	0.05
d)	Disputed Sales Tax Demand against which ₹ 19.33 crore (P.Y. ₹ 20.16 crore) deposited and ₹ 0.43 crore (P.Y. ₹ 0.07 crore) covered by Bank Guarantees	217.30	202.73
e)	Disputed Service Tax Demand	119.23	113.76
f)	Disputed Central Excise demand against which ₹ 0.76 crore (P.Y. ₹ 0.76 crore) Deposited	20.29	20.29
g)	Disputed PF demand	2.66	2.24
h)	Custom Bonds	317.98	254.80
i)	Outstanding GR-1 against which Bank Guarantee furnished of ₹ 0.73 crore (P.Y. ₹ 0.73 crore).	1.60	1.60
j)	Claims against the company not acknowledged as debts from a foreign supplier.*	-	128.89
Total (I)		999.60	942.62
(II)	Others on back to back basis where liability if any is to account of associate		
a)	Differential Custom Duty/Interest/Penalty etc.	184.49	166.87
Total (II)		184.49	166.87

Movement in respect of items mentioned at S.No. I) a) to j)

(₹ in crores)

Particulars		Balance as at 31st March, 2021	Reduction during the year in respect of opening balance	Addition during the year 2021-22	Balance as at 31st March, 2022
a)	Claims against the company not acknowledged as debts including foreign currency claim	175.57	5.68	111.28	287.17
b)	Disputed Income Tax Demand	42.69	9.32	-	33.38
c)	Disputed TDS demands	0.05	0.05	-	-
d)	Disputed Sales Tax Demand	202.73	3.80	18.38	217.30
e)	Disputed Service Tax Demand	113.76	0.60	6.06	119.23
f)	Disputed Central Excise demand	20.29	-	-	20.29
g)	Disputed PF demand	2.24	-	0.42	2.66
h)	Custom Bonds	254.80	38.97	102.16	317.98
i)	Outstanding GR-1	1.60	-	-	1.60
j)	Claims against the company not acknowledged as debts from a foreign supplier	128.89	128.89	-	-
Total		942.62	187.31	244.29	999.60

Movement in respect of items mentioned at S.No. II) a)

S. No.	Particulars	Balance as at 31st March, 2021	Reduction during the year in respect of opening balance	Addition during the year 2021-22	Balance as at 31st March, 2022
a)	Differential Custom Duty/Interest/Penalty etc.	166.87	-	17.62	184.49
	Total	166.87	-	17.62	184.49

- ia) Guarantees issued by Banks on behalf of the Company ₹ 3.07 crore (P.Y. ₹ 3.66 crore) in favour of customer towards performance of contracts against which backup guarantees amounting to ₹ Nil crore (P.Y. ₹ Nil crore) have been obtained from associate suppliers.
- ii) Letters of Credit opened by the Company remaining outstanding ₹ 9.33 crore (P.Y. ₹ 8.50 crore).
- iii) Corporate Guarantees of ₹ 1345.82 crore (P.Y. ₹ 1345.82 crore) given by the company in favour of financial Institutions/banks on behalf of Neelachal Ispat Nigam Limited (NINL), a Joint Venture Company, for securing principal and interest in respect of loans to NINL. (Refer 36 c (iv))
- iv) In some of the cases, amounts included under contingent liabilities relate to commodities handled on Govt. of India's account and hence the same would be recoverable from the Govt. of India.
- v) Additional liability, if any, on account of sales tax demands on completion of assessments, disputed claims of some employees, non-deduction of Provident Fund by Handling Agents/Contractors, disputed rent and interest/penalty/legal costs etc., in respect of amounts indicated as contingent liabilities being indeterminate, not considered.
- vi) Claims against the company not acknowledged as debt includes demand raised by RPF of ₹ 0.69 crores on account of MMTC Employees Cooperative Canteen Society.
- vii) a) Above includes amount of ₹ 0.07 crore on account of demand raised by Stock Exchange Board of India (SEBI) in relation to non-compliance of regulation 33 of SEBI.

35. Commitments

Capital Commitments: Estimated amount of contracts including foreign currency contracts net of advances remaining to be executed on capital account and not provided for is ₹ Nil crore (P.Y. ₹ Nil crore).

Capital commitment in respect of investment in joint venture ₹ Nil crore (P.Y. ₹ Nil crore).

36. General Disclosures :-

- a) Following goods on account of un-billed purchases are held by the Company under deposit and shown under other current assets (note no. 11 (B)) as well as other current liabilities (note no. 21).

Items	31/03/2022		31/03/2021	
	Qty	Value	Qty	Value
Gold (in Kgs)	53.00	24.96	733.96	291.11
Gold Jewellery (in Grams)	-	-	-	-
Silver (in Kgs)	-	-	600.00	3.39
TOTAL	53.00	24.96	1,333.96	294.50

- b) Nil kgs (P.Y. 3956.494 kgs) of un-refined Silver is lying in DRO as on 31.3.2022 on behalf of Shri Mata Veshno Devi Shrine Board. The value of the stock cannot be ascertained as fineness of the Silver is not known.
- c) Investment in and advances to Neelachal Ispat Nigam Ltd (NINL)-Joint Venture company :-
(i) The company alongwith Government of Odisha has set up a 1.1 MT integrated steel plant in Odisha and invested ₹ 459.11 crore (P.Y. ₹ 459.11 crore) (Note 6) towards 49.78% in equity capital in NINL. The Government of India (CCEA)



- has accorded 'in principle' approval on 8th January, 2020 for strategic divestment of equity investment held by MMTC and other Central/State PSUs. The process of divestment is underway through Department of Investment and Public Asset Management (DIPAM). As per the Final financial Bid for divestment of NINL, DIPAM had declared M/s Tata Steel Long Products as the H1 bidder for enterprise value of ₹ 12,100.00 crore.
- (ii) The company has been extending, from time to time, short term credit facility (cash credit) to NINL upto a limit of ₹ 1425.00 crore for its day to day operational activities on continuing basis. In addition, a trade related financial facility to the extent of ₹ 2038.10 crore has also been extended. Against this, outstanding under Other Assets (advances to related parties) (note 11) is ₹ 3463.11 crore (P.Y. ₹ 3528.47 crore). Further as per the provision of waterfall agreement signed for distribution of divestment proceeds pursuant to divestment process initiated and managed by DIPAM, seller/ promoters liabilities on NINL has been frozen upto 31.03.2021.
- (iii) Reconciliation of accounts with NINL duly signed by MMTC & NINL has been done upto 31.03.2022 with outstanding balance of ₹ 3463.11 crore. NINL's confirmation of balance of ₹ 3463.11 crore as on 31.3.2022 has been obtained. This does not include Interest for the year 2021-22.
- (iv) The company has also given corporate guarantees amounting to ₹ 1345.82 crore (P.Y. ₹ 1345.82 crore) in favour of FIs/Banks/others to secure the loans availed by NINL (note 34 (iii)). Since NINL is unable to service the interest of lenders, some of the lenders and bond holders have invoked the corporate guarantees, which are being addressed by NINL/MMTC separately. NINL is showing ₹ 1295.82 crore in its books against corporate guarantees given by MMTC. NINL has paid all bankers/FIs/ Bond Holders in July 22 and accordingly MMTC has written to all Bankers/ FIs / Bond Holders to treat MMTC Corporate Guarantee (CG) as Null and Void and to return the original guarantee at the earliest.
- (v) The company has been recognising trade related interest during earlier years on accrual basis and is included in the outstanding advances. However, during 2019-20 & 2020-21 interest of ₹ 252.18 crore & ₹ 295.69 crore respectively was not recognised in the respective years which has been recognised during the year. Further as per the provision of waterfall agreement signed for distribution of divestment proceeds signed pursuant to divestment process initiated and managed by DIPAM, seller/ promoters liabilities on NINL has been frozen upto 31.03.2021. Interest for the year 2019-20 and 2020-21 has been recognised as other trade income during the current year however interest for the year 2021-22 has not been recognised. Deferred tax asset created during 2020-21 has been reversed in the current year.
- (vi) NINL have given corporate guarantee of ₹ 2800.00 crore (P.Y. ₹ 2800.00 crore) to the company to secure credit facilities extended to them from time to time. After divestment NINL and receipt of funds by MMTC, NINL Corporate Guarantee (CG) is no more valid.
- (vii) NINL has been incurring losses for last 10 years and its net worth has become negative ₹ (-) 3487.41 crore as on 31.03.2021 (P.Y. ₹ (-) 2564.71 crore as on 31.3.2020). Audited financial statements of NINL as on 31.3.2022 are not available as NINL is yet to finalise its audited accounts for the year 2021-22.
- (viii) The final bid of ₹ 12,100 crores received from Tata Steel Long Product (TSLP) against NINL divestment. NINL disinvestment completed on 04.07.2022 and MMTC receipts are:-
- | | | |
|---|---|-----------------|
| Amount towards operational & financial debt. | - | ₹ 3463.11 crore |
| Amount towards sale consideration | - | ₹ 1872.34 crore |
| (Net of withholding tax against Investment of ₹ 459.10 crore) | | |
| Total Receipt by MMTC | - | ₹ 5335.45 crore |
- (ix) Over the above, an amount of ₹ 911.16 crore towards contingent liabilities on account of Govt. dues (₹ 36.77 crore – Non Tax liabilities & ₹ 874.39 crore – Tax liabilities) have been provided for in an interest bearing Escrow Account which shall be passed on to Sellers in the ratio of their stake holding, if the liabilities are not crystallised by the end of retention period (2 years for non – tax liabilities and 3 years for tax liabilities).
- (x) Out of realisation of ₹ 5335.45 crores, the estimated liabilities towards bank loan, Anglo Coal, dues to employees including VRS/ VSS and others liabilities may be in the range of ₹ 5200.00 crore to ₹ 5300.00 crore estimated in July 2022. This will be subject to actual settlement of liabilities/audit/reconciliation and direction from Ministry/ competent authority. This does not include contingent liabilities.
- d) The Company has filed a recovery suit of ₹ 31.40 crore against M/s AIPL in respect of Mint sale transaction (P.Y. ₹ 31.40 crore) which included overdue interest of ₹ 2.95 crore (P.Y. ₹ 2.95 crore) which has been decreed in favour of the Company. M/s AIPL have also filed a suit against Government Mint/MMTC for damages of ₹ 167.20 crore (P.Y. ₹ 167.20 crore) which is not tenable as per legal opinion and is being contested.
- e) Under Price Stabilization Scheme of the Government of India to create Buffer Stock of onion, MMTC imported onion from July 2019 onwards until 31.03.2020. As per the scheme MMTC's trading margin has been fixed at 1.5% on C&F cost at the time of sale and all expenses related to the import shall be to the account of Govt. The difference between the sale realisation and cost incurred including MMTC's margin has been shown as claim receivables from Govt. which will be adjusted with the advance received from Govt.
- f) A claim for ₹ 1.53 crore (P.Y. ₹ 1.53 crore) against an associate on account of damaged imported Polyester is pending for which a provision of ₹ 1.53 crore (P.Y. ₹ 1.53 crore) exists in the accounts after taking into account the EMD and other payables. The company has requested customs for abandonment which is pending for adjudication. A criminal & civil suit has been filed against the Associate.
- g) At RO Mumbai, during the year 2011-12, a foreign supplier has submitted forged shipping documents through banking channels to obtain payment of ₹ 4.13 crore (P.Y. ₹ 3.98 crore) without making delivery of the material (copper). However, the company has obtained an interim stay restraining the bank from making the payment under the letter of credit which was vacated and Indian bank had to make payment to the foreign bank. The matter is still pending in the court. The same supplier is also fraudulently holding on to the master bills of lading of another shipment of copper which would enable the Regional Office, Mumbai to take delivery and possession of goods valued at ₹ 8.60 crore (P.Y. ₹ 8.60 crore), already paid for and after adjustment of EMD & payables provision for the balance amount has been made during the year 2014-15.
- h) At RO Hyderabad, fake bills of lading covering two shipments of copper valued at ₹ 3.75 crore (P.Y. ₹ 3.75 crore) were received during 2011-12 through banking channels against which no material was received. The foreign supplier has been paid in full through letter of credit after the company received full payment from its Indian customer. The company has initiated legal action against the foreign supplier. The amount of ₹ 4.44 crore for this transaction received in full and final settlement from the local buyer which includes in Advance received from customer under other non-current liabilities.

- l) In a case relating to execution of decree filed by a foreign party against the coal supplier. MMTC has settled the original amount. The hearings are in progress and next date of hearing 22.7.2022.
- j) FCI in March 2019 approached MOC&A,F&PD for initiation of Administrative Mechanism for Resolution of CPSEs Disputes (AMRCD) proceedings against MMTC for an amount of ₹ 92.18 crores, including interest as MMTC had deducted an amount of ₹ 60.99 crores from FCI's payment in May 2014. MMTC explained its position that an amount of ₹ 60.99 crores was deducted from wheat exports in 2014 to recover MMTC's dues from FCI arising from multiple transactions since 1991 onwards. The matter was admitted for resolution under AMRCD. The AMRCD committee in its meeting held on 22 May 2020 directed both MMTC and FCI to reconcile the accounts. MMTC and FCI have since begun working towards reconciliation of the claims and counter claims. Numerous rounds of discussions have taken place between MMTC and FCI, wherein the supporting documents have been exchanged between both the parties to establish their claims and counter claims, respectively. Once a consensus is reached, subsequently a report will be presented to AMRCD for its final decision and order.
- k) There are several provision for doubtful recoverable amounting to ₹ 1.13 crore, the recoverability assessment of these balances could not be performed due to non-availability of sufficient information. The company has initiated an internal note to prepare a guideline to assess the recoverability of such balances.
- l) There was an outstanding liability of TDS amounting ₹ 2.36 crores for the month of March of March, 2022 which was payable on or before 30.04.2022. MMTC liquidity position is very weak and salaries/dues/expenses are in arrears accordingly due to paucity of funds. There was delay in deposit of TDS and the same was remitted on 19.05.2022 to the department along with interest of ₹ 0.097 crores.
- m) The Board of Directors has in principle approved for closure of Regional Offices (RO) and Sub Regional Offices (SRO) Accordingly suitable order has been issued on dated 22.06.2022 and tentative VRS consent has been opened subject to necessary approval.

37. Financial Instruments- Fair Values and Risk Management

37.1 Financial Instruments by Categories

The following tables show the carrying amounts and fair values of financial assets and financial liabilities by categories. It does not include fair value information for financial assets and financial liabilities not measured at fair value if the carrying amount is a reasonable approximation of fair value.

(₹ in crore as at March 31, 2022)

Particulars	Amortized cost	Financial assets/ liabilities at fair value through profit or loss	Financial assets/ liabilities at fair value through OCI	Total carrying value	Total fair value
Assets:					
Investments in Equity Instruments (Ref Note No.6)			11.03	11.03	11.03
Cash & Cash Equivalents (Ref Note No. 13)	43.36			43.36	
Trade Receivable (Ref Note No. 7)	135.10			135.10	
Employee Loans (Ref Note No. 8)	3.28			3.28	
Loans to related party (Ref Note No. 8)	-			-	
Other Financial Assets (Ref Note No. 9)	54.18			54.18	
Liabilities:					
Trade Payable (Ref Note No. 18)	269.90			269.90	
Borrowings (Ref Note No.17)	2551.44			2551.44	
Other Financial Liabilities (Ref Note No. 19)	222.04			222.04	

The carrying value and fair value of financial instruments by categories were as follows as on March 31, 2021:

(₹ in crore as at March 31, 2021)

Particulars	Amortized cost	Financial assets/ liabilities at fair value through profit or loss	Financial assets/ liabilities at fair value through OCI	Total carrying value	Total fair value
Assets:					
Investments in Equity Instruments (Ref Note No.6)			10.07	10.07	10.07
Cash & Cash Equivalents (Ref Note No. 13)	132.71			132.71	
Trade Receivable (Ref Note No. 7)	555.69			555.69	
Employee Loans (Ref Note No. 8)	4.85			4.85	
Loans to related party (Ref Note No. 8)	0.00			0.00	
Other Financial Assets (Ref Note No. 9)	51.13			51.13	
Liabilities:					
Trade Payable (Ref Note No. 18)	765.01			765.01	
Borrowings (Ref Note No.17)	2364.01			2364.01	
Other Financial Liabilities (Ref Note No. 19)	212.42			212.42	

37.2 Fair Value Hierarchy

- **Level 1** - Level 1 hierarchy includes financial instruments measured using quoted prices (unadjusted) in active markets.
- **Level 2** - Level 2 hierarchy includes financial instruments measured using inputs other than quoted prices included within Level 1 that are observable for the asset or liability, either directly (i.e. as prices) or indirectly (i.e. derived from prices).
- **Level 3** - Level 3 hierarchy includes financial instruments measured using inputs that are not based on observable market data (unobservable inputs).



The following tables present fair value hierarchy of assets and liabilities measured at fair value:

(₹ in crore as at March 31, 2022)

Particulars	Level 1	Level 2	Level 3	Total	Valuation Technique and key inputs	Significant unobservable inputs
Financial Assets						
Financial Investments at FVTOCI						
Investment in Equity Instruments (BSE)	11.03			11.03		Quoted Price
Investment in Equity Instruments (ICEX)			-	-	Cost adopted as best estimate of Fair Value	
Total	11.03	-	-	11.03		

(₹ in crore as at March 31, 2021)

Particulars	Level 1	Level 2	Level 3	Total	Valuation Technique and key inputs	Significant unobservable inputs
Financial Assets						
Financial Investments at FVTOCI						
Investment in Equity Instruments (BSE)	2.23			2.23		Quoted Price
Investment in Equity Instruments (ICEX)			7.84	7.84	Book Value adopted as best estimate of Fair Value	
Total	2.23	-	7.84	10.07		

37.3 Financial risk management, objectives and policies

The company's activities expose it to the following financial risks:

- market risk
- credit risk and
- liquidity risk

The company has not arranged funds that have any interest rate risk.

a) Market risk

(i) Foreign Exchange Risk

The company has import and export transactions and hence has foreign exchange risk primarily with respect to the US\$. The company has not arranged funds through long term borrowings. The short-term foreign currency loans (buyer's credit) availed from banks are fixed interest rate borrowings. As a result, the company does not have any interest rate risk. The company's risk management policy is to use hedging instruments to hedge the risk of foreign exchange.

The company uses foreign exchange forward contracts to hedge its exposure in foreign currency risk. The company designates the spot element of forward contracts with reference to relevant spot market exchange rate. The difference between the contracted forward and the spot market exchange rate is treated as the forward element. The changes in the spot exchange rate of hedging instrument that relate to the hedged item is deferred in the cash flow hedge reserve and recognized against the related hedged transaction when it occurs. The forward element of forward exchange contract is deferred in cost of hedging reserve and is recognized to the extent of change in forward element when the transaction occurs.

The following tables show the summary of quantitative data about the company's exposure to foreign currency risk from financial instruments expressed in ₹:

(₹ in crore as at March 31, 2022)

Particulars	US Dollars (in Equiv INR)	Other Currencies (in Equiv INR)	Total
Cash & cash equivalents	4.50	-	4.50
Trade Receivable	-	-	-
Demurrage / Despatch Receivable	4.98	-	4.98
Other Receivable	-	-	-
Total Receivable in foreign currency	9.48	-	9.48
Foreign Currency Loan payable	-	-	-
Interest on foreign currency loan payable	-	-	-
Trade Payables	7.43	-	7.43
Freight Demurrage / Despatch Payable	1.19	-	1.19
Provision towards Litigation Settlement	-	-	-
Others	1,054.87	-	1,054.87
Total Payable in Foreign Currency	1,063.50	-	1,063.50

The company has no exposure in respect of foreign currency receivable/payable since loss/gain is to the account of the Associate supplier/customer except on provision towards litigation settlement where matter is still under dispute. Also the company has taken forward exchange contracts in respect of payables at the risk and cost of the associate.

(₹ in crore as at March 31, 2021)

Particulars	US Dollars (in Equiv INR)	Other Currencies (in Equiv INR)	Total
Cash & cash equivalents	4.11	-	4.11
Trade Receivable	280.86	-	280.86
Demurrage / Despatch Receivable	4.61	1.65	6.26
Other Receivable	0.98	-	0.98
Total Receivable in foreign currency	290.56	1.65	292.21
Foreign Currency Loan payable	-	-	-
Interest on foreign currency loan payable	-	-	-
Trade Payables	15.82	0.55	16.36
Freight Demurrage / Despatch Payable	1.15	-	1.15
Provision towards Litigation Settlement	98.05	-	98.05
Others	904.19	-	904.19
Total Payable in Foreign Currency	1,019.21	055	1,019.76

The company has no exposure in respect of foreign currency receivable/payable since loss/gain is to the account of the Associate supplier/customer. Also the company has taken forward exchange contracts in respect of payables at the risk and cost of the associate.

Sensitivity:

As of March 31, 2022 and March 31, 2021, every 1% increase or decrease of the respective foreign currencies compared to our functional currency would impact our profit before tax by approximately ₹ NIL and ₹ NIL, respectively.

(i) **Price Risk**

The company's exposure to equity securities price risk arises from investments held by the company and classified in balance sheet as at fair value through other comprehensive income. Out of the two securities held by the company, one is listed in NSE and the other (ICEX) is not listed.

As of March 31, 2022 and March 31, 2021, every 1% increase or decrease of the respective equity prices would impact other component of equity by approximately ₹0.11 crore and ₹ 0.02 crore, respectively. It has no impact on profit or loss.

b) **Credit Risk**

Credit risk refers to the risk of default on its obligation by a counter party resulting in a financial loss. The maximum exposure to the credit risk at the reporting date is primarily from trade receivables. Accordingly, credit risk from trade receivables has been separately evaluated from all other financial assets in the following paragraphs.

Trade Receivables

The company's outstanding trade receivables are mostly secured through letter of credit/BG except in respect of JV's and Govt of India.

Impairment on trade receivables is recognized based on expected credit loss in accordance with provisions of Ind AS 109. The company's historical experience for customers, present economic condition and present performance of the customers, future outlook for the industry etc. are taken into account for the purposes of expected credit loss.

Credit risk exposure

An analysis of age of trade receivables at each reporting date is summarized as follows:

(₹ in crore as at March 31, 2022)

Particulars	Outstanding for following periods from due date of payment					Total
	Less than 6 months	6 months to 1 year	1-2 years	2-3 years	More than 3 years	
(i) Undisputed Trace receivables - Considered goods	7.33	2.88	5.15	3.17	116.39	134.92
(ii) Undisputed Trace receivables - which have significant increase in credit risk	-	-	-	-	-	-
(iii) Undisputed Trade receivables - credit impaired	-	-	-	-	7.73	7.73
(iv) Disputed Trade receivables - considered good	-	-	-	-	0.18	0.18
(v) Disputed Trade receivables - which have significant increase in credit risk	-	-	-	-	-	-
(vi) Disputed Trade receivables - credit impaired	-	-	-	-	382.38	382.38
Sub-Total	7.33	2.88	5.15	3.17	506.69	525.22
Less: Allowance for Credit Impairment						390.12
Total						135.10



(₹ in crore as at March 31, 2021)

Particulars	Outstanding for following periods from due date of payment					
	Less than 6 months	6 months to 1 year	1-2 years	2-3 years	More than 3 years	Total
(i) Undisputed Trade receivables - Considered goods	146.27	2.21	0.02	3.11	403.90	555.51
(ii) Undisputed Trade receivables - which have significant increase in credit risk	-	-	-	-	-	-
(iii) Undisputed Trade receivables - credit impaired	-	-	-	-	7.74	7.74
(iv) Disputed Trade receivables - considered good	-	-	-	-	0.18	0.18
(v) Disputed Trade receivables - which have significant increase in credit risk	-	-	-	-	-	-
(vi) Disputed Trade receivables - credit impaired	-	-	-	-	382.28	382.28
Sub-Total	146.27	2.21	0.02	3.11	794.11	945.71
Less: Allowance for Credit Impairment						390.02
Total						555.69

Trade receivables are generally considered credit impaired when overdue for more than three years (except government dues), unless the amount is considered receivable, when recoverability is considered doubtful based on the recovery analysis performed by the company for individual trade receivables. The company considers that all the above financial assets that are not impaired though overdue are of good credit quality.

With regard to certain trade receivables, the company has equivalent trade payables to associate suppliers which are payable on realization of trade receivables. Such trade receivables are considered not impaired though past due.

Other financial assets

Credit risk relating to cash and cash equivalents is considered negligible because our counterparties are banks. We consider the credit quality of term deposits with scheduled banks which are subject to the regulatory oversight of the Reserve Bank of India to be good, and we review these banking relationships on an ongoing basis. Credit risk related to employee loans are considered negligible since major loans like house building loans, vehicle loans etc. are secured against the property for which loan is granted to the employees. The other employee loans are covered under personal guarantee of concerned employees along with surety bonds of other serving employees. There are no impairment provisions as at each reporting date against these financial assets. We consider all the above financial assets as at the reporting dates to be of good credit quality.

a) Liquidity Risk

Our liquidity needs are monitored on the basis of monthly and yearly projections. The company's principal sources of liquidity are cash and cash equivalents, cash generated from operations and availability of funding through an adequate amount of committed credit facilities to meet obligations when due.

Due to the dynamic nature of underlying businesses, the company maintains flexibility in funding by maintaining availability under committed credit lines.

Short term liquidity requirements consists mainly of sundry creditors, expense payable, employee dues arising during the normal course of business as of each reporting date. The company arranges credit from bank and maintains balance in cash and cash equivalents to meet short term liquidity requirements.

The company assesses long term liquidity requirements on a periodical basis and manages them through internal accruals and committed credit lines.

The table below provides details regarding the contractual maturities of non-derivative financial liabilities. The table has been drawn up based on the undiscovered cash flows of financial liabilities based on the earliest date on which the company can be required to pay. The table includes both principal & interest cash flows.

(₹ in crore as at March 31, 2022)

Particulars	Less than 6 months	6 months to 1 year	1-2 years	2-3 years	More than 3 years	Total
(i) MSME	0.18	-	-	-	-	0.18
(ii) Others	269.72	-	-	-	-	269.72
(iii) Disputed Dues - MSME	-	-	-	-	-	-
(iv) Disputed dues-Others	-	-	-	-	-	-

(₹ in crore as at March 31, 2021)

Particulars	Less than 6 months	6 months to 1 year	1-2 years	2-3 years	More than 3 years	Total
(i) MSME	0.03	-	-	-	-	0.03
(ii) Others	764.98	-	-	-	-	764.98
(iii) Disputed Dues - MSME	-	-	-	-	-	-
(iv) Disputed dues-Others	-	-	-	-	-	-

38. Impact of Hedging Activities

38.1 Cash Flow Hedge

As at 31st March 2022 there was no outstanding Hedging Instrument on account of the company.

38.2 Fair Value Hedge

As per the Risk Management Policy, the company enters into forward contracts with commodity exchanges to hedge against price fluctuations in gold and silver inventories. The gain or loss on the hedging instrument is recognized in profit or loss. The hedging gain or loss on the hedged item adjusts the carrying amount of the hedged item and is recognised in profit or loss.

a. *Disclosure of effects of hedge accounting on financial position for hedging instruments:*

(₹ in crore as at March 31, 2022)

Type of Hedge and risk	Carrying amount of hedging instrument		Change in fair value of hedging instrument used as the basis for recognizing hedge ineffectiveness for the period	Nominal amounts of the hedging instruments	
	Assets	Liabilities		Liabilities (kgs)	Value
Fair Value hedge					
Price Risk					
Forward contract to sell gold	10.99			30	0.21
Forward contract to sell silver	12.81			240	018

(₹ in crore as at March 31, 2021)

Type of Hedge and risk	Carrying amount of hedging instrument		Change in fair value of hedging instrument used as the basis for recognizing hedge ineffectiveness for the period	Nominal amounts of the hedging instruments	
	Assets	Liabilities		Liabilities (kgs)	Value
Fair Value hedge					
Price Risk					
Forward contract to sell gold	12.91			33	3.74

b. *Disclosure of effects of hedge accounting on financial position for hedged items:*

(₹ in crore as at March 31, 2022)

Type of Hedge and risk	Carrying amount of hedged item		Accumulated amount of hedge adjustments on the hedged item included in the carrying amount of hedged item	Line item in the Balance Sheet in which the hedged item is included	Changes in value used as the basis for recognizing hedge ineffectiveness	Accumulated amount of hedge adjustments remaining in the balance sheet for any hedged items that have ceased to be adjusted for hedging gains and losses (para 6.5.10 of IndAS 109)
Fair Value hedge						
Price Risk						
Inventory of gold	-	-	-	Inventories	-	-

(₹ in crore as at March 31, 2021)

Type of Hedge and risk	Carrying amount of hedged item		Accumulated amount of hedge adjustments on the hedged item included in the carrying amount of hedged item	Line item in the Balance Sheet in which the hedged item is included	Changes in value used as the basis for recognizing hedge ineffectiveness	Accumulated amount of hedge adjustments remaining in the balance sheet for any hedged items that have ceased to be adjusted for hedging gains and losses (para 6.5.10 of IndAS 109)
Fair Value hedge						
Price Risk						
Inventory of gold	-	-	-	Inventories	-	-



39. Disclosure in respect of Indian Accounting Standard (Ind AS)-36 “Impairment of assets”

During the year, the company assessed the impairment loss of assets and accordingly provision towards impairment in the value of PPE amounting to ₹ Nil crores (P.Y. ₹ Nil crore) has been made during the year.

40. Disclosure in respect of Indian Accounting Standard (Ind AS)-19 “Employee Benefits”

40.1 General description of various employee’s benefits schemes are as under:

a) Gratuity:

Gratuity is paid to all employees on retirement/separation based on the number of years of service. The scheme is funded by the Company and is managed by a separate Trust through LIC. In case of MICA division employees the scheme is managed directly by the company through LIC. The scheme is funded by the company and the liability is recognized on the basis of contribution payable to the insurer, i.e., the Life Insurance Corporation of India, however, the disclosure of information as required under Ind AS-19 have been made in accordance with the actuarial valuation.

As per Actuarial Valuation company’s expected contribution for FY 2022-23 towards the Gratuity Fund Contribution is ₹ 2.42 crore (P.Y. ₹ 3.78 crore). However, the company is making contribution to the fund as per the demand made by Life Insurance Corporation of India.

b) Leave Compensation:

Payable on separation to eligible employees who have accumulated earned and half pay leave. Encashment of accumulated earned leave is also allowed during service leaving a minimum balance of 15 days twice in a year. The liability on this account is recognized on the basis of actuarial valuation.

c) Long Service Benefits: Long Service Benefits payable to the employees are as under :-

(i) Service Award:

Service Award amounting to ₹ 3,500/- for each completed year of service is payable to the employees on superannuation/voluntary retirement scheme.

(ii) Compassionate Gratuity

Compassionate Gratuity amounting to ₹ 50,000/- is payable in lump-sum to the dependants of the employee on death while in service.

(iii) Employees’ Family Benefit Scheme

Payments under Employees’ Family Benefit Scheme is payable to the dependants of the employee who dies in service till the notional date of superannuation. A monthly benefit @ 40% of Basic Pay & DA last drawn subject to a maximum of ₹ 12,000/- on rendering service of less than 20 years and similarly a monthly benefit @ 50% of Basic Pay & DA last drawn subject to maximum ₹ 12,000/- on rendering service of 20 years or more at the time of death.

(iv) Special Benefit to MICA Division employees amounting to ₹ 5,00,000/- (Officer), ₹ 4,00,000/- (Staff) and ₹ 3,00,000/- (Worker) upon retirement

The summarized position of various defined benefits recognized in the Statement of Profit & Loss, Other Comprehensive Income (OCI) and Balance Sheet & other disclosures are as under:

Net defined benefit obligation

(₹ in crore)

Particulars		Gratuity	Earned Leave	Sick Leave	Long Service Award	Special Benefit	Compassionate Gratuity	Employee Family Benefit
		(Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)
Defined Benefit Obligation	C.Y.	69.26	18.57	20.15	3.58	1.49	0.10	2.80
	P.Y.	90.95	16.01	20.59	4.35	1.85	0.12	3.63
Fair Value of Plan Assets	C.Y.	70.35	-	-	-	-	-	-
	P.Y.	82.45	-	-	-	-	-	-
Funded Status [Surplus/(Deficit)]	C.Y.		-	-	-	-	-	-
	P.Y.		-	-	-	-	-	-
Effect of asset ceiling	C.Y.		-	-	-	-	-	-
	P.Y.		-	-	-	-	-	-
Net Defined Benefit Assets/(Liabilities)	C.Y.	1.09	(18.57)	(20.15)	(3.58)	(1.49)	(0.10)	(2.80)
	P.Y.	(8.41)	(16.01)	(20.59)	(4.35)	(1.85)	(0.12)	(3.63)

Movement in defined benefit obligation

(₹ in crore)

Particulars		Gratuity	Earned Leave	Sick Leave	Long Service Award	Special Benefit	Compassionate Gratuity	Employee Family Benefit
		(Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)
Defined benefit obligation- Beginning of the year	C.Y.	90.85	16.01	20.59	4.35	1.85	0.12	3.63
	P.Y.	98.90	14.44	21.89	4.85	2.15	0.16	4.02
Current service cost	C.Y.	1.40	0.83	0.78	0.12	0.04	-	-
	P.Y.	3.28	0.76	0.82	0.15	0.05	-	-
Past Service Cost	C.Y.	0.00	-	-	-	-	-	-
	P.Y.	0.00	-	-	-	-	-	-
Interest Cost	C.Y.	5.83	1.03	1.32	0.28	0.12	-	-
	P.Y.	6.53	0.95	1.44	0.32	0.14	-	-
Benefits Paid	C.Y.	(17.59)	(3.04)	(2.94)	(0.36)	(0.41)	-	-
	P.Y.	(11.29)	(4.57)	(2.54)	(0.79)	(0.41)	-	-
Re-measurements - actuarial loss/(gain)	C.Y.	(11.23)	3.74	0.40	(0.80)	(0.11)	(0.02)	(0.84)
	P.Y.	(6.56)	4.43	(1.02)	(0.18)	(0.09)	(0.04)	(0.39)
Defined benefit obligation- End of the year	C.Y.	69.26	18.57	20.15	3.58	1.49	0.10	2.80
	P.Y.	90.85	16.01	20.59	4.35	1.85	0.12	3.63

Movement in plan asset

(₹ in crore)

Particulars	Gratuity (Funded)	
	31.03.2022	31.03.2021
	Fair value of plan assets at beginning of year	82.45
Interest income	5.50	5.90
Employer contributions	0.00	0.06
Benefits paid	(17.59)	(11.29)
Re-measurements - Actuarial (loss) / gain	(0.00)	0.01
Fair value of plan assets at end of year	70.35	82.45

Amount Recognized in Statement of Profit and Loss

(₹ in crore)

Particulars		Gratuity	Earned Leave	Sick Leave	Long Service Award	Special Benefit	Compassionate Gratuity	Employee Family Benefit
		(Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)
Current service cost	C.Y.	1.40	0.83	0.78	0.12	0.04	-	-
	P.Y.	3.28	0.76	0.82	0.15	0.05	-	-
Past Service Cost – Plan Amendment	C.Y.	0.00	-	-	-	-	-	-
	P.Y.	-	-	-	-	-	-	-
Service Cost (A)	C.Y.	1.40	0.83	0.78	0.12	0.04	-	-
	P.Y.	3.28	0.76	0.82	0.15	0.05	-	-
Net Interest on Net Defined Benefit Liability/(assets) (B)	C.Y.	0.54	1.03	1.32	0.28	0.12	-	-
	P.Y.	0.73	0.95	1.44	0.32	0.14	-	-
Net actuarial (gain) / loss recognized in the period	C.Y.	-	3.74	0.40	-	-	(0.02)	(0.84)
	P.Y.	-	4.43	(1.02)	-	-	(0.04)	(0.39)
Cost Recognized in P&L (A+B)	C.Y.	1.94	5.60	2.50	0.40	0.16	(0.02)	(0.84)
	P.Y.	4.01	6.15	1.25	0.47	0.19	(0.04)	(0.39)

Amount recognized in Other Comprehensive Income (OCI)

(₹ in crore)

Particulars		Gratuity	Earned Leave	Sick Leave	Long Service Award	Special Benefit	Compassionate Gratuity	Employee Family Benefit
		(Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)
Actuarial gain/(loss) due to DBO Experience	C.Y.	11.23	-	-	0.19	(0.07)	-	-
	P.Y.	6.56	-	-	0.21	0.11	-	-
Actuarial gain/(loss) due to assumption changes	C.Y.	-	-	-	0.17	0.18	-	-
	P.Y.	-	-	-	(0.03)	(0.02)	-	-
Actuarial gain/(loss) arising during the period (A)	C.Y.	11.23	-	-	3.36	0.11	-	-
	P.Y.	6.56	-	-	0.18	0.09	-	-
Return on Plan assets (greater)/less than discount rate (B)	C.Y.	0.20	-	-	-	-	-	-
	P.Y.	0.10	-	-	-	-	-	-
Actuarial gain/(loss) recognized in OCI (A+B)	C.Y.	11.44	-	-	0.36	0.11	-	-
	P.Y.	6.66	-	-	0.18	0.09	-	-



Sensitivity Analysis

(₹ in crore as at March 31, 2022)

Assumption	Change in Assumption	Gratuity	Earned Leave	Sick Leave	Long Service Benefits	Special Benefit	Compassionate Gratuity	Employee Family Benefit
		(Funded)	(Non Funded)	(Non Funded)	(Non Funded)	(Non Funded)	(Non Funded)	(Non Funded)
Discount rate	0.50%	(1.49)	(0.46)	(0.44)	(0.06)	(0.04)	-	-
	-0.50%	1.57	0.49	0.46	0.07	0.04	-	-
Salary growth rate	0.50%	0.36	0.49	0.46	-	-	-	-
	-0.50%	(0.41)	(0.47)	(0.44)	-	-	-	-

(₹ in crore as at March 31, 2021)

Assumption	Change in Assumption	Gratuity	Earned Leave	Sick Leave	Long Service Benefits	Special Benefit	Compassionate Gratuity	Employee Family Benefit
		(Funded)	(Non Funded)	(Non Funded)	(Non Funded)	(Non Funded)	(Non Funded)	(Non Funded)
Discount rate	0.50%	(2.05)	(0.42)	(0.46)	(0.08)	(0.04)	-	-
	-0.50%	2.07	0.44	0.48	0.09	0.05	-	-
Salary growth rate	0.50%	2.07	0.44	0.48	-	-	-	-
	-0.50%	(2.07)	(0.42)	0.46	-	-	-	-

Actuarial Assumption

Assumption		Gratuity	Earned Leave	Sick Leave	Long Service Benefits	Special Benefit	Compassionate Gratuity	Employee Family Benefit
		(Funded)	(Non Funded)	(Non Funded)	(Non Funded)	(Non Funded)	(Non Funded)	(Non Funded)
Method used	C.Y.	Projected Unit Credit	Projected Unit Credit	Projected Unit Credit	Projected Unit Credit	Projected Unit Credit	Projected Unit Credit	Projected Unit Credit
	P.Y.	Projected Unit Credit	Projected Unit Credit	Projected Unit Credit	Projected Unit Credit	Projected Unit Credit	Projected Unit Credit	Projected Unit Credit
Discount rate	C.Y.	6.69%	6.69%	6.69%	6.69%	6.69%	6.69%	6.69%
	P.Y.	6.42%	6.42%	6.42%	6.42%	6.42%	6.42%	6.42%
Rate of salary increase	C.Y.	6.00%	6.00%	6.00%	-	-	-	-
	P.Y.	6.00%	6.00%	6.00%	-	-	-	-
Mortality rate	C.Y.	IALM (2012-14)	IALM (2012-14)	IALM (2012-14)	IALM (2012-14)	IALM (2012-14)	IALM (2012-14)	IALM (2012-14)
	P.Y.	IALM (2012-14)	IALM (2012-14)	IALM (2012-14)	IALM (2012-14)	IALM (2012-14)	IALM (2012-14)	IALM (2012-14)

Expected Benefit Payments

(₹ in crore)

Sr. No.	Year of payment	Gratuity	Earned Leave	Sick Leave	Long Service Benefits	Special Benefit	Compassionate Gratuity	Employee Family Benefit
		(Funded)	(Non Funded)	(Non Funded)	(Non Funded)	(Non Funded)	(Non Funded)	(Non Funded)
1	0 to 1 Year	11.80	3.17	3.55	0.71	0.42	-	-
2	1 to 2 Year	11.46	2.75	3.71	0.68	0.30	-	-
3	2 to 3 Year	8.44	2.25	2.11	0.47	0.26	-	-
4	3 to 4 Year	6.11	1.40	1.72	0.29	0.28	-	-
5	4 to 5 Year	7.06	2.02	2.14	0.35	0.13	-	-
6	5 to 6 Year	5.75	1.71	1.97	0.30	0.00	-	-
7	6 Year onwards	18.64	5.26	4.96	0.78	0.11	-	-

Category of investment in Plan assets

Category of Investment	% of fair value of plan assets
Insured benefits	100%

- d) **Provident Fund:** The Company's contribution paid/payable during the year to Provident Fund and the liability is recognized on accrual basis. The Company's Provident Fund Trust is exempted under Section 17 of Employees' Provident Fund and Miscellaneous Provisions Act, 1952. The conditions for grant of exemptions stipulate that the employer shall make good deficiency, if any, in the interest rate declared by the Trusts vis-à-vis statutory rate. The company does not anticipate any further obligations in the near foreseeable future having regard to the assets of the funds and return on investment.
- e) **Superannuation Pension Benefit** – During the year, the Company has recognized ₹ 4.06 crore (P.Y. ₹ 4.56 crore) towards Defined Contribution Superannuation Pension Scheme in the Statement of Profit & Loss.
- f) **Post-Retirement Medical Benefit:** Available to retired employees at empanelled hospitals for inpatient treatment and also for OPD treatment under 'Defined Contribution Scheme' as under:
- a. The liability @ 1.50% of PBT for the year in respect of scheme for retirees prior to 1.1.2007 (closed group) has been not been recognised on the basis of affordability even though company has reported profit before tax ₹ 120.60 crore during the year. Also, the company has not provided for PRMBS for open group @ 4.50% Basic+DA for serving employees. During the year provision in respect retirees after 1.1.2007 pertaining to year 2019-20 & 2020-21 has been withdrawn due to loss during those year. Same will be reviewed during FY 2022-23
- b. During 2019-20, the company has created trust for management of fund and paid ₹150.00 crore to trust against company's liability towards the scheme. Net Liability has been shown as company's obligation as on 31.3.2022 under 'Defined Contribution Scheme'.

41. Disclosure in respect of Indian Accounting standard (Ind AS)-108: "Operating Segments"

Based on the "management approach" as defined in Ind AS 108, the Chief Operating Decision Maker (CODM) evaluates the company's performance and allocates resources based on an analysis of various performance indicators by business segments. Accordingly, information has been presented for each business segment. The accounting principles used in the preparation of the financial statements are consistently applied to record revenue and expenditure in individual business segments, and are as set out in the significant accounting policies. Business segments of the company are:- Precious Metals, Metals, Minerals, Coal & Hydrocarbon, Agro Products, Fertilizer and Others.

Segment Revenue and Expense

Details regarding revenue and expenses attributable to each segment must be disclosed

Segment assets include all operating assets in respective segments comprising of net fixed assets and current assets, loans and advances etc. Assets relating to corporate and construction are included in unallocated segments. Segment liabilities include liabilities and provisions directly attributable to respective segment.

Segment revenues and results

(₹ in crore as at March 31, 2022)

Particulars	Precious Metals	Metals	Minerals	Coal & Hydro-Carbon	Agro Products	Fertilizers	Others	Total
Segment Revenue from External Customers								
Within India	6013.01	30.33	0.01	751.09	75.60	1459.83	28.53	8358.41
Outside India	-	-	25.98	-	-	-	8.89	34.88
Inter-Segment Revenue								
Total Segment Revenue	6013.01	30.33	26.00	751.09	75.60	1459.83	37.42	8393.29
Segment Results								
Within India	27.73	0.18	0.01	547.84	2.74	10.11	3.27	591.88
Outside India	-	-	1.26	-	-	-	0.37	1.63
Total segmental results								
Unallocated Corporate expenses:	27.73	0.18	1.27	547.84	2.74	10.11	3.64	593.51
Interest expenses (net)								201.65
Other unallocated expenses net of other income								271.26
Profit before tax from ordinary activities								120.60



(₹ in crore as at March 31, 2021)

Particulars	Precious Metals	Metals	Minerals	Coal & Hydro-Carbon	Agro Products	Fertilizers	Others	Total
Segment Revenue from External Customers								
Within India	14,029.93	74.03	1.32	586.14	671.45	9185.83	28.17	24576.86
Outside India	-	-	1796.78	-	-	-	7.96	1804.74
Inter-Segment Revenue								
Total Segment Revenue	14029.93	74.03	1798.10	586.14	671.45	9185.83	36.14	26,381.61
Segment Results								
Within India	53.13	0.80	1.32	(30.73)	7.02	29.40	2.97	63.91
Outside India	-	-	50.22	-	-	-	0.25	50.47
Total segmental results	53.13	0.80	51.54	(30.73)	7.02	29.40	3.22	114.38
Unallocated Corporate expenses:								
Interest expenses (net)								193.27
Other unallocated expenses net of other income								1015.33
Profit before tax from ordinary activities								(1094.22)

Segment assets and liabilities

(₹ in crore as at March 31, 2022)

Particulars	Precious Metals	Metals	Minerals	Coal & Hydro-Carbon	Agro Products	Fertilizers	Others	Total
A.01 Segment Assets :								
Assets	87.55	7.73	23.58	3695.73	200.32	18.26	416.46	4449.63
Unallocated assets								313.33
Total Assets								4762.96
A.02 Segment Liabilities :								
Liabilities	109.54	24.20	26.66	1353.66	268.16	31.33	17.35	1830.90
Unallocated liabilities								2738.66
Total Liabilities								4569.56

(₹ in crore as at March 31, 2021)

Particulars	Precious Metals	Metals	Minerals	Coal & Hydro-Carbon	Agro Products	Fertilizers	Others	Total
A.01 Segment Assets :								
Assets	427.26	19.21	333.84	3509.61	392.70	19.81	39.99	4742.42
Unallocated assets								764.33
Total Assets								5506.76
A.02 Segment Liabilities :								
Liabilities	442.64	38.67	343.55	1200.13	432.70	19.80	23.71	2501.20
Unallocated liabilities								2583.10
Total Liabilities								5084.29

Information about major customers

The revenues from transactions with a single external customer amounting to 10 per cent or more of the entity's revenues are given below:

Major Customer (customer having more than 10% revenue)	2021-22	2020-21
Total Revenue	1458.90	9177.84
No. of customers	1	1
% of Total Revenue	17.38%	34.79%
Product Segment	Fertilizers	Fertilizers

42. Disclosure in respect of Indian Accounting Standard 24 "Related Parties Disclosures"

42.1 Disclosures for Other than Govt. Related Entities

a. List of key management personnel

Name	Designation
i. Shri Sanjay Chadha	Chairman and Managing Director - (Managing Director) (w.e.f 14.05.2020 upto 28.02.2022)
ii. Shri Vibhu Nayar	Chairman and Managing Director - (Managing Director) (w.e.f 01.03.2022)
iii. Shri Kapil Kumar Gupta	Director(F) & (Chief Financial Officer)
iv. Shri J Ravi Shanker	Director
v. Shri R R Sinha	Director (Personnel)

b. Subsidiary

MMTC Transnational Pte. Ltd., Singapore

c. Joint Venture:-

- i. Neelachallspat Nigam Ltd
- ii. Free Trade Warehousing Pvt. Ltd.
- iii. MMTC Pamp India Pvt. Ltd.
- iv. MMTC Gitanjali Ltd.
- v. Sical Iron Ore Terminal Ltd.

d. Government and its related entities

- i. Government of India - holds 89.93% equity shares of the Company and has control over the company.
- ii. Central Public Sector Enterprises in which Government of India has control.

e. Post-Employment Benefit Plan

- i. MMTC Limited CPF Trust
- ii. MMTC Limited Gratuity Trust
- iii. MMTC Limited Employees' Defined Contribution Superannuation Trust
- iv. MMTC Employees Post-Retirement Medical Benefit Trust

f. Compensation of key management personnel

(₹ in crore)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Short-term benefits	1.08	1.35
Post-employment benefits	0.28	0.32
Other long-term benefits	-	-
Share-based payments	-	-
Termination benefits	-	-
Total	1.36	1.66
Recovery of Loans & Advances during the year	-	0.00
Advances released during the year		
Closing Balance of Loans & Advances as on 31.03.2022	-	0.00



g. Transactions with Related Parties (₹ in crore)

Particulars	MMTC Gitanjali Private Limited		MMTC PAMP India Private Limited		Sical Iron Ore Terminal Limited		Indian Commodity Exchange Limited		MTPPL		Neelachal Ispat Nigam Limited		Free Trade Warehousing Pvt. Ltd.		Others	
	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21
Sale of goods and services	-	-	2.41	2.51	-	-	-	-	-	-	-	2.08	-	-	-	-
Purchase of raw material/goods and services	-	-	78.54	107.12	-	-	-	-	0.91	1.74	232.36	25.38	-	-	-	-
Payments on behalf of company	-	-	-	-	-	-	-	-	-	-	-	-	-	-	88.05	77.82
Other transactions	-	-	-	-	-	-	-	-	37.18	28.64	1.49	-	-	-	19.47	6.01

h. Outstanding balances arising from sale/purchase of goods/services (₹ in crore)

Particulars	MMTC Gitanjali Private Limited		MMTC PAMP India Private Limited		Sical Iron Ore Terminal Limited		Indian Commodity Exchange Limited		MTPPL		Neelachal Ispat Nigam Limited		Free Trade Warehousing Pvt. Ltd.	
	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21
Trade Payables	0.02	0.02	-	-	-	-	-	-	-	0.76	-	1.46	-	-
Trade receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Other Payables	-	-	-	0.03	-	-	-	-	-	-	-	-	-	-
Other Receivables	-	-	-	-	-	-	-	-	0.06	0.09	-	-	-	-

i. Loans to Joint Ventures (₹ in crore)

Particulars	MMTC Gitanjali Private Limited		MMTC PAMP India Private Limited		Sical Iron Ore Terminal Limited		Indian Commodity Exchange Limited		MTPPL		Neelachal Ispat Nigam Limited		Free Trade Warehousing Pvt. Ltd.	
	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21
Loans at beginning of the year	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Loan advanced	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Repayment received/adjusted	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Interest charged	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Interest received	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Balance at end of the year including interest	-	-	-	-	-	-	-	-	-	-	-	-	-	-

j. Advance to Joint Ventures (₹ in crore)

Particulars	MMTC Gitanjali Private Limited		MMTC PAMP India Private Limited		Sical Iron Ore Terminal Limited		MTPPL		Neelachal Ispat Nigam Limited		Free Trade Warehousing Pvt. Ltd.		Haldia Free Trade Warehousing Pvt. Ltd.		Kandla Free Trade Warehousing Pvt. Ltd.	
	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21
Advances Given	-	-	-	-	-	-	-	-	3,463.11	3528.47	-	-	-	-	-	-

k. Disclosure as per Ind AS 27 'Separate financial statements :

a) Investment in Subsidiary:

Name of the Company	Country of Incorporation	% of Company's ownership Interest	
		March 31, 2022	March 31, 2021
MMTC Transnational Pte. Ltd.	Singapore	100%	100%

b) Investment in Joint Venture

Name of the Company	Country of Incorporation	% of Company's ownership Interest	
		March 31, 2022	March 31, 2021
1. Free Trade Warehousing Pvt. Ltd.	India	50	50
2. MMTC Pamp India Pvt. Ltd.	India	26	26
3. Sical Iron Ore Terminal Ltd.	India	26	26
4. MMTC Gitanjali Ltd.	India	26	26
5. Neelanchal Ispat Nigam Limited	India	49.78	49.78

l. Loans to KMP

Particulars	March 31, 2022	March 31, 2021
Loans at beginning of the year	0.00	0.00
Loans advanced	-	-
Repayment received	0.00	-
Interest charged	-	-
Interest received	-	0.00
Balance at end of the year including interest	-	-

m. Loans to related parties are for short term & to KMP are in the nature of welfare advances. Interest is charged basis market rates from time to time.

n. Disclosure for transactions entered with Govt. and Govt. Entities

S. No.	NAME OF GOVT/ GOVT ENTITIES	NATURE OF RELATIONSHIP WITH THE COMPANY	NATURE OF TRANSACTIONS	VALUE (RS)	OUTSTANDING BALANCE	
					RECEIVABLE	PAYABLES
1	Deptt. of Fertilizer GOI	Majority Owner	Sale of Goods	1458.90	14.40	-
2	Deptt. of Consumer Affairs GOI	Majority Owner	Import of Pulses	-	-	35.45
3	Other Departments of Govt. of India	Majority Owner	Purchase/Sale of Goods	153.80	94.06	5.82
4.	CPSEs	Related through GOI	Purchase/Sale of Goods	42.57	13.63	0.34

42.2 Disclosure in respect of Indian Accounting standard (Ind AS) 116 "Leases"

42.3 As lessee

a) Finance leases: The Company does not have any finance lease arrangement during the period.

b) Operating lease

(₹ in crore)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
1 Depreciation charge for right of use assets	0.43	0.42
2 Interest expense on lease liabilities	0.33	0.49
3 Expense on short term leases	-	-
4 Expense on low value assets	-	-
5 Expense relating to variable lease payments not included in measurement of lease liability	-	-
6 Income from subleasing right of use assets	-	-
7 Total cash outflow for leases	0.72	0.84
8 Addition to right of use assets	0.01	0.14
9 Carrying amount of right of use assets at the end of the reporting period	3.14	3.35



Maturity analysis of lease liabilities

(₹ in crore)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Not later than 1 year	0.11	0.37
Later than 1 year and not later than 5 years	0.42	0.42
Later than 5 years	3.12	3.23

c) The company is using the right of use assets for operating its business activities.

d) As a practical expedient, short term leases (having a term of 12 months or less) and leases for which the underlying assets is of low value upto ₹1,00,000/- per month and ₹12,00,000/- per year are not recognized as per the provisions given under Ind AS-116 (Leases).

42.4 As a lessor

a) Finance leases: The Company does not have any finance lease arrangement during the period.

b) Operating leases

• Future minimum lease receivables under non-cancellable operating lease

(₹ in crore)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Not later than 1 year	1.73	1.50
Later than 1 year and not later than 5 years	2.16	3.89
Later than 5 years	-	-

43. Disclosure in respect of Indian Accounting Standard (Ind AS)-33 "Earnings Per Share(EPS)"

a) Basic & Diluted EPS

The earnings and weighted average number of ordinary shares used in the calculation of basic & diluted EPS and Basic EPS is as follows:

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Profit (loss) for the year, attributable to the owners of the company (₹ in crore)	(241.93)	(769.69)
Weighted average number of ordinary shares for the purpose of basic earnings per share	1,500,000,000	1,500,000,000
Basic & Diluted EPS (In ₹)	(1.61)	(5.13)

44. Disclosure in respect of Indian Accounting Standard (Ind AS)-37 "Provisions, Contingent Liabilities and Contingent Assets"

(₹ in crore)

Particulars of Provision	Opening Balance as on 01.04.21	Adjustment during year	Addition during year	Closing Balance as on 31.03.22
Destinational Weight & Analysis Risk	0.08	0.08	-	-
Bonus/PRP	17.46	14.25	0.04	3.25
Provision for Litigation Settlements	888.81	(0.13)	178.44	1067.39

45. The details of micro, small or medium enterprises to whom the Company owes dues as at 31st March, 2022 is as under:

(₹ in crore)

	2021-22	2020-21
a) (i) The Principal amount remaining unpaid to any supplier at the end of accounting year	0.28	0.18
(ii) The interest due on above	-	-
TOTAL (i) & (ii) (included under note 18 & 19)	0.28	0.18
b) Amount of interest paid by the buyer in terms of Section 16 of the Act	-	-
c) The amount of interest due and payable for the period of delay in making payment (which have been paid but beyond the due date during the year) but without adding the interest specified under the Act	-	-
d) The amount of interest accrued and remaining unpaid at the end of each accounting year	-	-
e) The amount of further interest remaining due and payable even in the succeeding years, until such date when the interest dues above are actually paid to the small enterprise, for the purpose of disallowance of a deductible expenditure under section 23 of the act	-	-

46. Disclosure in respect of Indian Accounting Standard (Ind AS)-115: "Revenue from Contract with Customers" Disclosure

A. (i) Contracts with customers

a) Company has recognized the following revenue during the year from contracts with its customers (₹ in crore)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Sale of products	7836.28	26,361.59
Sale of services	4.50	2.89
Other operating revenue		
- Claims	0.15	25.90
- Subsidy	-	-
- Despatch Earned	-	-
- Other Trade Income	552.36	(8.77)
Total	8393.29	26381.61

b) Company has recognized the following amount as impairment loss against the amount receivables from its customers or contract assets arising due to contract with its customers (₹ in crore)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Impairment Loss	0.00	1.06

(ii) Disaggregation of Revenue

The Company has identified its Operating Segments as Minerals, Precious Metals, Metals, Agro Products, Coal & Hydrocarbon, Fertilizer and General Trade/others. The segment wise revenue generated from the contract with customers and its proportion in total revenue is as follows:- (₹ in crore)

Particulars	For the year ended March 31, 2022	As % to Total Revenue	For the year ended March 31, 2021	As % to Total Revenue
Precious Metals	6013.01	71.64%	14029.93	53.18%
Metals	30.33	0.36%	74.03	0.28%
Minerals	26.00	0.31%	1798.10	6.82%
Coal & Hydrocarbon	751.09	8.95%	586.14	2.22%
Agro Products	75.60	0.90%	671.45	2.55%
Fertilizers	1459.83	17.39%	9185.83	34.82%
Others	37.42	0.45%	36.14	0.14%
Total	8393.29	100%	26381.61	100%

(iii) Contract Balances

(a) Receivables

(₹ in crore)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Opening Balance	945.71	2314.33
Addition/(deduction) during the year	(420.49)	(1368.62)
Closing Balance	525.22	945.71

(b) Contract Assets

Company recognises contract assets when it satisfies its obligation by transferring the goods or services to the customer and right to receive the consideration is established which is subject to some conditions to be fulfilled by the company in future before receipt of consideration amount. Being a trading company performance obligation of the company is satisfied upon transferring a promised goods or service to its customers and there is no obligation on the part of the company which remains unexecuted.

(c) Contract Liabilities

Upon execution of contract with the customers, certain amount in the form of EMD, Security Deposit, Margin Money, advance for payment of custom duty etc. received from the customers which is shown as advance received from customers under the heading "Other Financial Liabilities" and "Other Liabilities"



(₹ in crore)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Opening Balance	462.26	212.24
Add: Addition during the year	26.41	329.36
Less: Deduction (Refunds/adjustments)	108.40	24.25
Less: Recognised as revenue during the year forming part of opening balance	15.28	55.09
Closing Balance	364.98	462.26

During the year company has recognized revenue of ₹ Nil crore (P.Y. ₹ Nil crore) from the performance obligations satisfied in earlier periods by raising debit/credit notes to its customers.

The company has made the adjustment of ₹ Nil crore (P.Y. ₹ Nil Crore) in the revenue of ₹ Nil crore (P.Y. ₹ Nil crore) recognized during the year on account of discounts, rebates, refunds, credits, price concessions, incentives performance bonuses etc. as against the contracted revenue of ₹ Nil crore (P.Y. ₹ Nil crore).

(d) Practical expedients

During the year company has entered into sales contracts with its customers where some of the part is yet to be executed, same has not been disclosed as per practical expedient as the duration of the contract is less than one year or right to receive the consideration established on completion of the performance by the company.

B. Significant judgements in the application of this standard

- (i) Revenue is recognized by the company when the company satisfies a performance obligation by transferring a promised good or service to its customers. Asset/goods/services are considered to be transferred when the customer obtains control of those asset/goods/services.
- (ii) The company considers the terms of the contract and its customary business practices to determine the transaction price. The transaction price is the amount of consideration to which an entity expects to be entitled in exchange for transferring promised goods or services to a customer, excluding amounts collected on behalf of third parties (for example, GST etc.).
- (iii) The consideration promised in a contract with a customer may include fixed amounts, variable amounts, or both. Any further adjustment will be made by raising debit/credit notes on the customer. While determining the transaction price effects of variable consideration, constraining estimates of variable consideration, the existence of a significant financing component in the contract, non-cash consideration and consideration payable to a customer is also considered.
- (iv) Certain adjustments have been made during the year in contract value which is not significant keeping in view the amount involved.

C. Assets Recognised from costs to obtain or fulfill a contract with a customer

Being a trading company, costs incurred by the company are fixed in nature with no significant incremental cost to obtain or fulfill a contract with a customer and same is charged to profit and loss as a practical expedient.

47. Title deeds of Immovable Property not held in the name of the Company:

Relevant line item in the Balance Sheet	Description of item of property	Gross carrying value	Title deeds held in the name of	Whether title deed holder is a promoter, director or relative of promoter/director or Employee of promoter/director	Property Held since Which date/ Allotment Date	Reason for not being held in the name of the company
PPE	Land	1.04	Scope, New Delhi	-	13.12.2000	Scope is yet to sign lease agreement with L&DO
PPE	Building	5.74	Scope, New Delhi	-	13.12.2000	Scope is yet to sign lease agreement with L&DO

48. Financial Ratios

Particulars	Numerator	Denominator	Ratio as at March 31, 2022	Ratio as at March 31, 2021
Current Ratio (in times)	Current Assets	Current Liabilities	0.87	0.86
Debt equity ratio (in times) ¹	Total Debt	Shareholders Equity	13.19	5.60
Debt service Coverage Ratio (in times) ²	Earnings available for debt service	Debt Service	(0.15)	(2.85)
Return on Equity Ratio (in %)	Net Profits after taxes	Average Shareholder's equity	(0.79)	(0.96)
Trade payables turnover ratio (in times) ³	Net Credit purchase	Average Trade Payables	14.31	35.27
Net profit ratio (in %)	Net Profit	Net Sales	(0.03)	(0.03)
Return on Capital employed (in %) ²	Earning before interest and taxes	Capital Employed	0.12	(0.32)
Net capital turnover ratio (in times) ⁴	Net Sales	Working Capital	(13.52)	(38.06)
Trade Receivables turnover ratio (in times)	Net Credit Sales	Avg. Accounts Receivable	22.70	21.25
Return on investment (in %)	Income from Investments	Time weighted average investment	1.53	1.52
Inventory turnover ratio (in times)	Cost of goods sold or Sales	Average Inventory	207.88	200.20

1. Due accrual to interest related to borrowings.
2. Due recognition of interest on trade related advance to NINL amounting to ₹ 547.87 crore during the year.
3. Due to decrease in purchase during the year.
4. Due to decrease in sale during the year.

49. Other Statutory Information

- a) The Company do not have any Benami property, where any proceeding has been initiated or pending against the Company for holding any Benami property.
 - b) The Company do not have any transactions with companies struck off
 - c) The Company do not have any charges or satisfaction which is yet to be registered with ROC beyond the statutory period
 - d) The Company have not traded or invested in Crypto currency or Virtual Currency during the financial year
 - e) The Company have not advanced or loaned or invested funds to any other person(s) or entity(ies), including foreign entities (Intermediaries) with the understanding that the Intermediary shall:
 - Directly or indirectly lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the company (Ultimate Beneficiaries) or
 - Provide any guarantee, security or the like to or on behalf of the Ultimate Beneficiaries
 - f) The Company have not received any fund from any person(s) or entity(ies), including foreign entities (Funding Party) with the understanding (whether recorded in writing or otherwise) that the Company shall:
 - Directly or indirectly lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the Funding Party (Ultimate Beneficiaries) or
 - Provide any guarantee, security or the like on behalf of the Ultimate Beneficiaries
 - g) The Company do not have any transaction which is not recorded in the books of accounts that has been surrendered or disclosed as income during the year in the tax assessments under the Income Tax Act, 1961 (such as, search or survey or any other relevant provisions of the Income Tax Act, 1961
 - h) The company is not in contravention with the number of layers prescribed under section 2(87) of the Act
 - i) The Company has not entered into any Scheme of Arrangements that has been approved by the Competent Authority in terms of sections 230 to 237 of the Act
 - j) The company has not been declared wilful defaulter by any bank or financial institution or other lender
- 50.** The accounts of certain trade receivables, trade payables, short and long term loans and advances, other non-current and current Assets are subject to confirmation / reconciliation and adjustment, if any. The Management does not expect any material difference affecting the current year's financial statements.



In the opinion of the management, the assets other than property plant and equipment, intangible assets and non-current investments are expected to realize at the amount at which they are stated, if realized in the ordinary course of business and provision for all known liabilities have been adequately made in the books of accounts.

51. MMTCL limited is operating in seven business segments Precious Metals, Metals, Minerals, Coal and Hydrocarbon, Agro Products, Fertilizers and General Trade/ others. The business has been impacted due to the instruction of administrative ministry for downsizing/ VRS /Closure of offices etc. This has affected the financial performance of the company.
52. Whole time Directors are allowed usage of staff cars for private use up to 1,000 km per month on payment of ₹ 2000 per month in accordance with guidelines issued by Department of Public Enterprise (GOI).
53. Accounting policies and notes attached form an integral part of the financial statements.
54. Amount in the financial statements are presented in ₹ crore (upto two decimals) except for per share data and as otherwise stated. Certain small amounts may not appear in financial statements due to rounding off in ₹ in crore. Previous year's figures have been regrouped/rearranged wherever considered necessary.

55. Approval of financial statements

The financial statements were approved by the board of directors and authorised for issue on 08.07.2022.

As per our report of even date attached

For and on behalf of Board of Directors

For M. L. Puri & Co.
Chartered Accountants
F.R. No.: 00002312N

(CA. R C Gupta)
Partner
M. No. 095584

(G. Anandanarayanan)
Company Secretary
ACS-13691

(B.N. Dash)
Chief General Manager(F&A)

(Kapil Kumar Gupta)
Director (F) & CFO
DIN:08751137

Date: 08.07.2022
Place: New Delhi

(J Ravi Shanker)
Director
DIN: 06961483

(Vibhu Nayar)
Chairman and Managing Director
DIN: 03590141





MMTC TRANSNATIONAL PTE LTD. Financial Statements

(Incorporated in Singapore, Registration No. 199407265M)

FINANCIAL STATEMENTS

for the financial year ended 31st March, 2022



MMTC TRANSNATIONAL PTE. LTD.
(Company Registration No.: 199407265M)

DIRECTORS' STATEMENT
FOR THE FINANCIAL YEAR ENDED 31 MARCH 2022

The directors are pleased to present their statement to the members, which consists of a sole corporate shareholder, together with the audited financial statements of MMTC Transnational Pte. Ltd. (the "Company") for the financial year ended 31 March 2022.

1. OPINION OF THE DIRECTORS

In the opinion of the directors,

- (i) the financial statements of the Company are drawn up so as to give a true and fair view of the financial position of the Company as at 31 March 2022 and the financial performance, changes in equity and cash flows of the Company for the year then ended; and
- (ii) at the date of this statement, there are reasonable grounds to believe that the Company will be able to pay its debts as and when they fall due.

2. DIRECTORS

The directors of the Company in office at the date of this statement are:

Devasish Nayak

Rajiv Ranjan Sinha

Ravi Shanker Janardhanan

Thimmasarthy Srinivasa Rao

3. ARRANGEMENTS TO ENABLE DIRECTORS TO ACQUIRE SHARES OR DEBENTURES

Neither at the end of nor at any time during the financial year was the Company a party to any arrangement whose objects are, or one of whose objects is to enable the directors of the Company to acquire benefits by means of the acquisition of shares in, or debentures of, the Company or any other body corporate.

4. DIRECTORS' INTERESTS IN SHARES OR DEBENTURES

According to the register of directors' shareholdings kept by the Company under Section 164 of the Singapore Companies Act 1967 (the "Act"), the directors of the Company who held office at the end of the financial year had no interests in the shares or debentures of the Company and its related corporations either at the beginning or end of financial year.

5. SHARE OPTIONS

There were no share options granted during the financial year to subscribe for unissued shares of the Company.

There were no shares issued during the financial year by virtue of the exercise of options to take up unissued shares of the Company.

There were no unissued shares of the Company under option at the end of the financial year.

6. AUDITORS

The auditors, TKNP International, Public Accountants and Chartered Accountants of Singapore, have expressed its willingness to accept re-appointment as auditors.

On behalf of the Board of Directors,

Thimmasarthy Srinivasa Rao

Director

Devasish Nayak

Director

Date: 17.06.2022



MMTC TRANSNATIONAL PTE. LTD.
(Company Registration No.: 199407265M)

**INDEPENDENT AUDITORS' REPORT
FOR THE FINANCIAL YEAR ENDED 31 MARCH 2022**

Auditor's Responsibilities for the Audit of the Financial Statements

INDEPENDENT AUDITORS' REPORT TO THE MEMBERS OF MMTC TRANSNATIONAL PTE. LTD.

Report on the Audit of the Financial Statements

Opinion

We have audited the financial statements of MMTC Transnational Pte. Ltd. (the "Company"), which comprise the statement of financial position as at 31 March 2022, and the statement of profit or loss and other comprehensive income, statement of changes in equity and statement of cash flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying financial statements are properly drawn up in accordance with the provisions of the Singapore Companies Act 1967 (the "Act") and Financial Reporting Standards in Singapore (FRSs) so as to give a true and fair view of the financial position of the Company as at 31 March 2022 and of the financial performance, changes in equity and cash flows of the Company for the year ended on that date.

Basis for Opinion

We conducted our audit in accordance with Singapore Standards on Auditing (SSAs). 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 Accounting and Corporate Regulatory Authority (ACRA) Code of Professional Conduct and Ethics for Public Accountants and Accounting Entities (ACRA Code) together with the ethical requirements that are relevant to our audit of the financial statements in Singapore, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the ACRA Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Other Information

Management is responsible for the other information. The other information comprises the Directors' Statement set out on pages 1 to 2.

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 in the audit, or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

Responsibilities of Management and Directors for the Financial Statements

Management is responsible for the preparation of financial statements that give a true and fair view in accordance with the provisions of the Act and FRSs, and for devising and maintaining a system of internal accounting controls sufficient to provide a reasonable assurance that assets are safeguarded against loss from unauthorised use or disposition; and transactions are properly authorised and that they are recorded as necessary to permit the preparation of true and fair financial statements and to maintain accountability of assets.

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.

The directors' responsibilities include overseeing the Company's financial reporting process.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditors' 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 SSAs 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 SSAs, we exercise professional judgement 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, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control.
- 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 auditors' 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 auditors' 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 the directors 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.

Report on Other Legal and Regulatory Requirements

In our opinion, the accounting and other records required by the Act to be kept by the Company have been properly kept in accordance with the provisions of the Act.

The engagement partner on the audit resulting in this independent auditors' report is Ong Lien Wan.

TKNP International
Public Accountants and
Chartered Accountants
Singapore

Date: 17.06.2022



MMTC TRANSNATIONAL PTE. LTD.
(Company Registration No.: 199407265M)

STATEMENT OF FINANCIAL POSITION
AS AT 31 MARCH 2022

	Note	2022	2021
		US\$	US\$
ASSETS			
Non-current assets			
Property, plant and equipment	4	1,868	3,309
Right of use assets	5	87,821	-
Other assets	6	27,265	27,279
		116,954	30,588
Current assets			
Cash and cash equivalents	7	18,624,350	11,938,319
Trade and other receivables	8	35,203,691	38,035,326
		53,828,041	49,973,645
Total assets		53,944,995	50,004,233
LIABILITIES AND EQUITY			
Current liabilities			
Trade and other payables	9	35,070,243	32,001,236
Other Liabilities	10	3,247,358	-
Borrowings	11	9,269,000	7,326,484
Lease liabilities	12	90,629	-
Income tax expense		102,513	201,745
		47,779,743	39,529,465
Equity			
Share capital	13	1,000,000	1,000,000
Retained earnings		5,165,252	9,474,768
		6,165,252	10,474,768
Total liabilities and equity		53,944,995	50,004,233

See accompanying notes to the financial statements

MMTC TRANSNATIONAL PTE. LTD.
(Company Registration No.: 199407265M)

STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME
FOR THE FINANCIAL YEAR ENDED 31 MARCH 2022

	Note	2022 US\$	2021 US\$
Revenue income	14	456,575,465	486,198,121
Other income	15	254,520	2,070,174
Foreign exchange difference		(8,286)	(7,184)
Expenses and costs			
- Purchase of commodities		446,209,592	473,423,224
- Freight cost		8,259,362	11,756,979
- Employee compensation	16	658,866	692,964
- Depreciation of property, plant and equipment	4	2,782	3,896
- Depreciation of right of use assets	5	87,821	87,859
- Bank charges		316,954	429,388
- Finance costs	17	400,818	485,548
- Other expenses	18	70,300	66,491
		(456,006,495)	(486,946,349)
Profit before tax		815,204	1,314,762
Income tax expense	19	(124,720)	(196,584)
Profit for the year, representing total comprehensive income for the year		690,484	1,118,178

STATEMENT OF CHANGE IN EQUITY FOR THE
FINANCIAL YEAR ENDED 31ST MARCH, 2022

	Note	Share capital US\$	Retained earnings US\$	Total US\$
At 1 April 2020		1,000,000	12,256,590	13,256,590
Dividends paid	21	-	(3,900,000)	(3,900,000)
Profit for the year, representing total comprehensive income for the year		-	1,118,178	1,118,178
At 31 March 2021		1,000,000	9,474,768	10,474,768
1 April 2021		1,000,000	9,474,768	10,474,768
Dividends paid	21	-	(5,000,000)	(5,000,000)
Profit for the year, representing total comprehensive income for the year		-	690,484	690,484
At 31 March 2022		1,000,000	5,165,252	6,165,252

See accompanying notes to the financial statements



MMTC TRANSNATIONAL PTE. LTD.
(Company Registration No.: 199407265M)

STATEMENT OF CASH FLOWS FOR THE FINANCIAL YEAR ENDED 31 MARCH 2022

	<u>Note</u>	<u>2022</u> US\$	<u>2021</u> US\$
Cash flows from operating activities			
Profit before tax		815,204	1,314,762
Adjustments for:			
Depreciation of property, plant and equipment	4	2,782	3,896
Depreciation of right-of-use assets	5	87,821	87,859
Foreign exchange		2,941	-
Interest expense	17	400,818	485,548
Interest income	15	(53,308)	(488,713)
Operating profit before working capital changes		1,256,258	1,403,352
Changes in working capital:			
Decrease/(increase) in trade and other receivables		2,831,635	(19,504,744)
(Increase) in other assets		-	(310)
Increase in trade and other payables		3,069,007	28,291,087
Increase in other liabilities		3,247,358	-
Proceeds/(repayment) from borrowings	A	1,942,516	(8,262,539)
Cash generated from operations		12,346,774	1,926,846
Income tax paid		(223,952)	(139,803)
Interest paid		(396,958)	(484,148)
Net cash generated from operating activities		11,725,864	1,302,895
Cash flows from investing activities			
Acquisition of property, plant and equipment	4	(1,341)	(2,075)
Interest received		53,308	488,713
Net cash generated from investing activities		51,967	486,638
Cash flows from financing activities			
Dividends paid	21	(5,000,000)	(3,900,000)
Fixed deposits pledged	A	4,682,157	3,726,417
Margin on letter of credit		(12,189,475)	(2,000,000)
Repayment of lease liability	A	(87,940)	(88,966)
Interest paid		(3,860)	(1,400)
Net cash (used in) financing activities		(12,599,11)	(2,263,949)
Net (decrease) in cash and cash equivalents		(821,287)	(474,416)
Cash and cash equivalents at beginning of year		1,033,389	1,507,805
Cash and cash equivalents at end of year	7	212,102	1,033,389

Note A:

A reconciliation of liabilities arising from financing activities is as follows:

	1 April 2021	Cash flows	Non-cash changes				31 March 2022		
			US\$	US\$	Interest expenses	Acquisition		Accretion of interests	Forex exchange
Borrowings	7,326,484	1,942,516	(396,958)	-	396,958	-	9,269,000		
Lease liabilities	-	(87,940)	(3,860)	175,642	3,860	2,927	90,629		
Pledged fixed deposits	(8,904,930)	4,682,157	-	-	-	-	4,222,773)		

	1 April 2020	Cash flows	Non-cash changes				31 March 2021	
			US\$	US\$	Interest expenses	Acquisition		Accretion of interests
Borrowings	15,589,023	(8,262,539)	(484,148)	-	484,148	-	7,326,484	
Lease liabilities	88,966	(88,966)	(1,400)	-	-	1,400	-	
Pledged fixed deposits	(12,631,347)	3,726,417	-	-	-	-	(8,904,930)	

See accompanying notes to the financial statements

MMTC TRANSNATIONAL PTE. LTD.
(Company Registration No.: 199407265M)

NOTES TO THE FINANCIAL STATEMENTS FOR THE FINANCIAL YEAR ENDED 31ST MARCH 2022

These notes form an integral part and should be read in conjunction with the accompanying financial statements.

1. CORPORATE INFORMATION

MMTC Transnational Pte. Ltd.(the “Company”) is a private company limited by shares which is incorporated and domiciled in Singapore.

The registered office and the principal place of business of the Company are located at 3 Raffles Place, #08-01, Bharat Building, Singapore 048617.

The principal activities of the Company are trading in minerals, metals, fertilizers, agricultural products, coal, gold and hydrocarbon products, jewellery and other commodities. There have been no significant changes in the nature of these activities during the financial year.

The immediate and ultimate holding company is MMTC Limited, which is incorporated in the Republic of India.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

2.1) BASIS OF PREPARATION

The financial statements of the Company have been drawn up in accordance with Financial Reporting Standards in Singapore (“FRSs”). The financial statements have been prepared on the historical cost basis except as disclosed in the accounting policies below.

The financial statements are presented in United States Dollar (“US\$”), which is also the functional currency of the Company.

The preparation of financial statements in conformity with FRSs requires management to exercise its judgement in the process of applying the company’s accounting policies. It also requires the use of accounting estimates and assumptions. Although these estimates are based on management’s best knowledge of current events and actions, actual results may ultimately differ from those estimates. The areas where estimates and assumptions are significant or critical to the financial statements are disclosed in Note 3 to the financial statements.

2.2) ADOPTION OF NEW AND AMENDED STANDARDS AND INTERPRETATIONS

The accounting policies adopted are consistent with those of the previous financial year except that in the current financial year, the Company has adopted all the new and revised FRSs that are mandatory from the effective date stated in the relevant FRSs.

2.3) STANDARD ISSUED BUT NOT YET EFFECTIVE

The Company has not adopted the following standards that have been issued but not yet effective:

	Effective for annual periods beginning on or after
• Amendments to FRS 37 Provisions, Contingent Liabilities and Contingent Assets: Onerous Contracts – Cost of Fulfilling a Contract	1 January 2022
• Annual Improvements to FRSs 2018-2020	1 January 2022
• Amendments to FRS 1 Presentation of <i>Financial Statements</i> : Classifications of Liabilities as Current or Non-Current	1 January 2023
• Amendments to FRS 1 <i>Presentation of Financial Statements</i> and FRS Practice Statement 2: Disclosure of Accounting Policies	1 January 2023
• Amendments to FRS 8 <i>Accounting Policies, Changes in Accounting Estimates and Errors</i> : Definition of Accounting Estimates	1 January 2023
• Amendments to FRS 12 <i>Income Taxes</i> : Deferred Tax related to Assets and Liabilities arising from a Single Transaction	1 January 2023

The directors expect that the adoption of the standards above will have no material impact on the financial statements in the year of initial application.

2.4) PROPERTY, PLANT AND EQUIPMENT

All items of property, plant and equipment are initially recorded at cost. Subsequent to recognition, property, plant and equipment are measured at cost less accumulated depreciation and any accumulated impairment losses. The cost of property, plant and equipment includes its purchase price and any costs directly attributable



to bringing the asset to the location and condition necessary for it to be capable of operating in the manner intended by management. Dismantlement, removal or restoration costs are included as part of the cost of property, plant and equipment if the obligation for dismantlement, removal or restoration is incurred as a consequence of acquiring or using the property, plant and equipment.

Depreciation is calculated using the straight-line method to allocate depreciable amounts over their estimated useful lives. The estimated useful lives are as follows:

	<u>Useful lives</u>
Leasehold improvement	3 years
Furniture and fittings	3 years
Computer equipment	3 years
Office equipment	3 years

The residual value, useful lives and depreciation method are reviewed at the end of each reporting period, and adjusted prospectively, if appropriate.

An item of property, plant and equipment is derecognised upon disposal or when no future economic benefits are expected from its use or disposal. Any gain or loss on de-recognition of the asset is included in profit or loss in the year the asset is derecognised.

2.5) IMPAIRMENT OF NON-FINANCIAL ASSETS

The Company assesses at each reporting date whether there is an indication that an asset may be impaired. If any indication exists, or when an annual impairment testing for an asset is required, the Company makes an estimate of the asset's recoverable amount.

An asset's recoverable amount is the higher of an asset's or cash-generating unit's fair value less costs of disposal and its value in use and is determined for an individual asset, unless the asset does not generate cash inflows that are largely independent of those from other assets or group of assets. Where the carrying amount of an asset or cash-generating unit exceeds its recoverable amount, the asset is considered impaired and is written down to its recoverable amount.

Impairment losses are recognised in profit or loss.

A previously recognised impairment loss is reversed only if there has been a change in the estimates used to determine the asset's recoverable amount since the last impairment loss was recognised. If that is the case, the carrying amount of the asset is increased to its recoverable amount. That increase cannot exceed the carrying amount that would have been determined, net of depreciation, had no impairment loss been recognised previously. Such reversal is recognised in profit or loss.

2.6) FINANCIAL INSTRUMENTS

Financial assets

Initial recognition and measurement

Financial assets are recognised when, and only when the Company becomes a party to the contractual provisions of the instruments.

At initial recognition, the Company measures a financial asset at its fair value plus, in the case of a financial asset not at fair value through profit or loss (FVPL), transaction costs that are directly attributable to the acquisition of the financial asset. Transaction costs of financial assets carried at FVPL are expensed in profit or loss.

Trade receivables are measured at the amount of consideration to which the Company expects to be entitled in exchange for transferring promised goods or services to a customer, excluding amounts collected on behalf of third party.

Subsequent measurement

Investments in debt instruments

Subsequent measurement of debt instruments depends on the Company's business model for managing the asset and the contractual cash flow characteristics of the asset. The three measurement categories for classification of debt instruments are amortised cost, fair value through other comprehensive income (FVOCI) and FVPL. The Company only has debt instruments at amortised cost.

Financial assets that are held for the collection of contractual cash flows where those cash flows represent solely payments of principal and interest are measured at amortised cost. Financial assets are measured at amortised cost using the effective interest method, less impairment. Gains and losses are recognised in profit or loss when the assets are derecognised or impaired, and through the amortisation process.

Derecognition

A financial asset is derecognised where the contractual right to receive cash flows from the asset has expired. On derecognition of a financial asset in its entirety, the difference between the carrying amount and the sum of the consideration received and any cumulative gain or loss that had been recognised in other comprehensive income for debt instruments is recognised in profit or loss.

Financial liabilities

Initial recognition and measurement

Financial liabilities are recognised when, and only when, the Company becomes a party to the contractual provisions of the financial instrument. The Company determines the classification of its financial liabilities at initial recognition.

All financial liabilities are recognised initially at fair value plus in the case of financial liabilities not at FVPL, directly attributable transaction costs.

Subsequent measurement

After initial recognition, financial liabilities that are not carried at FVPL are subsequently measured at amortised cost using the effective interest method. Gains and losses are recognised in profit or loss when the liabilities are derecognised, and through the amortisation process.

Derecognition

A financial liability is derecognised when the obligation under the liability is discharged or cancelled or expires. On derecognition, the difference between the carrying amounts and the consideration paid is recognised in profit or loss.

2.7) IMPAIRMENT OF FINANCIAL ASSETS

The Company recognises an allowance for expected credit losses (ECLs) for all debt instruments not held at FVPL. ECLs are based on the difference between the contractual cash flows due in accordance with the contract and all the cash flows that the Company expects to receive, discounted at an approximation of the original effective interest rate. The expected cash flows will include cash flows from the sale of collateral held or other credit enhancements that are integral to the contractual terms.

ECLs are recognised in two stages. For credit exposures for which there has not been a significant increase in credit risk since initial recognition, ECLs are provided for credit losses that result from default events that are possible within the next 12-months (a 12-month ECL). For those credit exposures for which there has been a significant increase in credit risk since initial recognition, a loss allowance is recognised for credit losses expected over the remaining life of the exposure, irrespective of timing of the default (a lifetime ECL).

For trade receivables, the Company applies a simplified approach in calculating ECLs. Therefore, the Company does not track changes in credit risk, but instead recognises a loss allowance based on lifetime ECLs at each reporting date. The Company has established a provision matrix that is based on its historical credit loss experience, adjusted for forward-looking factors specific to the debtors and the economic environment which could affect debtors' ability to pay.

The Company considers a financial asset in default when contractual payments are 180 days past due. However, in certain cases, the Company may also consider a financial asset to be in default when internal or external information indicates that the Company is unlikely to receive the outstanding contractual amounts in full before taking into account any credit enhancements held by the Company. A financial asset is written off when there is no reasonable expectation of recovering the contractual cash flows.

2.8) CONTRACT BALANCE

Contract assets

A contract asset is the right to consideration in exchange for goods or services transferred to the customer. If the Company performs by transferring goods or services to a customer before the customer pays consideration or before payment is due, a contract asset is recognised for the earned consideration that is conditional.

Contract liabilities

A contract liability is the obligation to transfer goods or services to a customer for which the Company has received consideration (or an amount of consideration is due) from customer. If customer pays consideration before the Company transfers good or services to the customer, a contract liability is recognised when the payment is made or the payment is due (whichever is earlier). Contract liabilities are recognised as revenue when the Company performs under the contract.

2.9) CASH AND CASH EQUIVALENTS

Cash and cash equivalents comprise cash at banks and on hand and are subject to an insignificant risk of changes in value.

2.10) GOVERNMENT GRANTS

Government grants are recognised as a receivable when there is reasonable assurance that the grant will be received



and all attached conditions will be complied with.

When the grant relates to an expense item, it is recognised as income on a systematic basis over the periods that the related costs, for which it is intended to compensate, are expensed. When the grant relates to an asset, the fair value is recognised as deferred income on the statement of financial position and is recognised as income in equal amounts over the expected useful life of the related asset.

2.11) SHARE CAPITAL

Proceeds from issuance of ordinary shares are recognised as share capital in equity. Incremental costs directly attributable to the issuance of ordinary shares are deducted against share capital.

2.12) LEASES

The Company assesses at contract inception whether a contract is, or contains, a lease. That is, if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration.

As lessee

The Company applies a single recognition and measurement approach for all leases, except for short-term leases and leases of low-value assets. The Company recognises lease liabilities representing the obligations to make lease payments and right-of-use assets representing the right to use the underlying leased assets.

Right-of-use assets

The Company recognises right-of-use assets at the commencement date of the lease (i.e. the date the underlying asset is available for use). Right-of-use assets are measured at cost, less any accumulated depreciation and impairment losses, and adjusted for any remeasurement of lease liabilities. The cost of right-of-use assets includes the amount of lease liabilities recognised, initial direct costs incurred, and lease payments made at or before the commencement date less any lease incentives received. Right-of-use assets are depreciated on a straight-line basis over the shorter of the lease term and the estimated useful lives of the assets.

If ownership of the leased asset transfers to the Company at the end of the lease term or the cost reflects the exercise of a purchase option, depreciation is calculated using the estimated useful life of the asset. The right-of-use assets are also subject to impairment. The accounting policy for impairment is disclosed in Note 2.5.

The Company's right-of-use assets are disclosed in Note 5 to financial statements.

Lease liabilities

At the commencement date of the lease, the Company recognises lease liabilities measured at the present value of lease payments to be made over the lease term. The lease payments include fixed payments (including in-substance fixed payments) less any lease incentives receivable, variable lease payments that depend on an index or a rate, and amounts expected to be paid under residual value guarantees. The lease payments also include the exercise price of a purchase option reasonably certain to be exercised by the Company and payments of penalties for terminating the lease, if the lease term reflects the Company exercising the option to terminate. Variable lease payments that do not depend on an index or a rate are recognised as expenses (unless they are incurred to produce inventories) in the period in which the event or condition that triggers the payment occurs.

In calculating the present value of lease payments, the Company uses its incremental borrowing rate at the lease commencement date because the interest rate implicit in the lease is not readily determinable. After the commencement date, the amount of lease liabilities is increased to reflect the accretion of interest and reduced for the lease payments made. In addition, the carrying amount of lease liabilities is remeasured if there is a modification, a change in the lease term, a change in the lease payments (e.g. changes to future payments resulting from a change in an index or rate used to determine such lease payments) or a change in the assessment of an option to purchase the underlying asset.

The Company's lease liabilities are disclosed in Note 12 to financial statements.

2.13) REVENUE RECOGNITION

Revenue is measured based on the consideration to which the Company expects to be entitled in exchange for transferring promised goods or services to a customer, excluding amounts collected on behalf of third parties.

Revenue is recognised when the Company satisfies a performance obligation by transferring a promised good or service to the customer, which is when the customer obtains control of the good or service. A performance obligation may be satisfied at a point in time or over time. The amount of revenue recognised is the amount allocated to the satisfied performance obligation.

Sale of commodities

Sales are recognised when control of the commodities have transferred to its customers (i.e. Point in time). The risk of obsolescence and loss have been transferred to the customers, and either the customers have accepted the goods in accordance with the sales contract, the acceptance provisions have lapsed, or the Company has objective evidence that all criteria for acceptance have been satisfied. No element of financing is deemed present as the sales are made

with a credit term of 30 to 180 days, which is consistent with market practice.

Interest income

Interest income is accrued on a time basis, by reference to the principal outstanding and at the effective interest rate applicable.

Demurrage and despatch income

Demurrage and despatch income are recognised if it is estimated reliably, and it is probable that it will be received.

2.14) RELATED PARTY

A related party is a person or entity that is related to the Company and includes:

- (a) A person or a close member of that person's family is related to reporting entity if that person:
- (i) has control or joint control over the reporting entity;
 - (ii) has significant influence over the reporting entity; or
 - (iii) is a member of the key management personnel of the reporting entity or of a parent of the reporting entity.
- (b) An entity is related to a reporting entity if any of the following condition applies:
- (i) The entity and the reporting entity are members of the same group (which means that each parent, subsidiary and fellow subsidiary is related to the others).
 - (ii) One entity is an associate or joint venture of the other entity (or an associate or joint venture of a member of a group of which the other entity is a member).
 - (iii) Both entities are joint ventures of the same third party.
 - (iv) One entity is a joint venture of a third entity and the other entity is an associate of the third entity.
 - (v) The entity is a post-employment benefit plan for the benefit of employees of either the reporting entity or an entity related to the reporting entity. If the reporting entity is itself such a plan, the sponsoring employers are also related to the reporting entity.
 - (vi) The entity is controlled or jointly controlled by a person identified in (a).
 - (vii) A person identified in (a)(i) has significant influence over the entity or is a member of the key management personnel of the entity (or of a parent of the entity).
 - (viii) The entity, or any member of a group of which it is a part, provides key management personnel services to the reporting entity or to the parent of the reporting entity.

The following are not necessarily related parties:

- (a) Two entities simply because they have a director or other member of key management personnel in common;
- (b) Two venturers simply because they share joint control over a joint venture.

Key management personnel are those persons having the authority and responsibility of planning, directing and controlling the activities of the Company.

2.15) INCOME TAX

Current income tax

Current income tax assets and liabilities for the current year and prior periods are measured at the amount expected to be recovered from or paid to the tax authority. The tax rates and tax laws used to compute the amount are those that are enacted or substantively enacted at the reporting date.

Current income taxes are recognised in profit or loss except to the extent that the tax relates to items recognised outside profit or loss, either in other comprehensive income or directly in equity. Management periodically evaluates positions taken in the tax returns with respect to situations in which applicable tax regulations are subject to interpretation and establishes provisions where appropriate.

Deferred tax

Deferred tax is provided using the liability method on temporary differences at the end of the reporting date between the tax base of assets and liabilities and their carrying amounts for financial reporting purposes.

Deferred tax assets and liabilities are measured at the tax rates that are expected to apply in the year when the asset is realised or the liability is settled, based on tax rates and tax laws that have been enacted or substantively enacted by the end of the reporting period.

Deferred tax assets and deferred tax liabilities are offset, if a legally enforceable right exists to set off current income tax assets against current income tax liabilities and the deferred taxes relate to the same taxable entity and the same tax jurisdiction.

Goods and Services Tax (GST)



Revenues, expenses and assets are recognised net of the amount of GST except:

- where the GST incurred on a purchase of assets or services is not recoverable from the taxation authority, in which case the GST is recognised as part of the cost of acquisition of the asset or as part of the expense item as applicable; and
- receivables and payables that are stated with the amount of GST included.

The net amount of GST recoverable from, or payable to, the taxation authority is included as part of receivables or payables in the statement of financial position.

2.16) BORROWING COSTS

Borrowing costs are recognised in profit or loss in the period in which they are incurred using the effective interest method.

2.17) FOREIGN CURRENCY TRANSACTIONS AND BALANCES

Transactions in foreign currencies are measured in the functional currency of the Company and are recorded on initial recognition in the functional currency at exchange rates approximating those ruling at the transaction dates. Monetary assets and liabilities denominated in foreign currencies are translated at the rate of exchange ruling at the reporting date. Non-monetary items that are measured in terms of historical cost in a foreign currency are translated using the exchange rates as at the dates of the initial transactions.

Exchange differences arising on the settlement of monetary items or on translating monetary items at the end of the reporting period are recognised in profit or loss.

2.18) EMPLOYEE BENEFITS

Defined contribution plans

The Company makes contributions to the Central Provident Fund scheme in Singapore, a defined contribution pension scheme. Contributions to defined contribution pension schemes are recognised as an expense in the period in which the related service is performed. The Company has no further obligations once the contributions have been paid.

Short-term employee benefits

Short-term employee benefit obligations are measured on an undiscounted basis and are expensed as the related service is provided. A liability is recognised for the amount expected to be paid if the Company has a present legal or constructive obligation to pay this amount as a result of past service provided by the employee, and the obligation can be estimated reliably.

3. SIGNIFICANT ACCOUNTING JUDGEMENTS AND ESTIMATES

The preparation of the Company's financial statements requires management to make judgements, estimates and assumptions that affect the reported amounts of revenues, expenses, assets and liabilities, and the disclosure of contingent liabilities at the end of each reporting period. Uncertainty about these assumptions and estimates could result in outcomes that require a material adjustment to the carrying amount of the asset or liability affected in the future periods.

3.1) Judgements made in applying accounting policies

The management is of the opinion that there are no significant judgements made in applying accounting estimates and policies that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial year.

3.2) Key sources of estimation uncertainty

The key assumptions concerning the future and other key sources of estimation uncertainty at the end of the reporting period are discussed below. The Company based its assumptions and estimates on parameters available when the financial statements were prepared. Existing circumstances and assumptions about future developments, however, may change due to market changes or circumstances arising beyond the control of the Company. Such changes are reflected in the assumptions when they occur.

Provision for expected credit losses of trade receivables

The Company uses a provision matrix to calculate ECLs for trade receivables. The provision rates are based on days past due for groupings of various customer segments that have similar loss patterns.

The provision matrix is initially based on the Company's historical observed default rates. The Company will calibrate the matrix to adjust historical credit loss experience with forward-looking information. At every reporting date, historical default rates are updated and changes in the forward-looking estimates are analysed.

The assessment of the correlation between historical observed default rates, forecast economic conditions and ECLs is a significant estimate. The amount of ECLs is sensitive to changes in circumstances and of forecast economic conditions. The Company's historical credit loss experience and forecast of economic conditions may also not be representative of customer's actual default in the future. The information about the ECLs on the Company's trade receivables is disclosed in Note 22 to the financial statements.

The carrying amount of the Company's trade receivables as at 31 March 2022 is disclosed in Note 8 to the financial statements.

Useful lives of property, plant and equipment

The useful life of an item of property, plant and equipment is estimated at the time the asset is acquired and is based on historical experience with similar assets and takes into account anticipated technological or other changes. If changes occur more rapidly than anticipated or the asset experiences unexpected level of wear and tear, the useful life will be adjusted accordingly.

The carrying amount of the Company's property, plant and equipment as at 31 March 2022 is disclosed in Note 4 to the financial statements.

Impairment of property, plant and equipment

The Company assess annually whether property, plant and equipment exhibit any indication of impairment. In instances where there are indications of impairment, the recoverable amounts of property, plant and equipment will be determined based on value-in-use calculations. These calculations require the use of judgement and estimates.

The carrying amount of the Company's property, plant and equipment as at 31 March 2022 is disclosed in Note 4 to the financial statements.

COVID-19

The outbreak of COVID-19 pandemic globally and in Singapore is causing significant disturbance and slowdown of economic activity. The Company has considered internal and external information while finalising various estimates in relation to its financial statement up-to the date of approval of the financial statements by the Board of Directors and has not identified any material impact on the carrying value of assets, liabilities or provisions.

However, the impact assessment of COVID-19 is a continuing process given the uncertainties associated with its nature and duration. The Company is monitoring the situation closely and shall take actions as appropriate based on any material changes to future economic conditions.

PROPERTY, PLANT AND EQUIPMENT

	Leasehold improvement	Furniture and fittings	Computer equipment	Office equipment	Total
	US\$	US\$	US\$	US\$	US\$
Cost					
At 1 April 2020	121,394	41,200	49,490	26,239	238,323
Additions	-	-	2075	-	2,075
At 31 March 2021	121,394	41,200	51,565	26,239	240,398
Additions	-	-	1,341	-	1,341
At 31 March 2022	121,394	41,200	52,906	26,239	241,739
Accumulated depreciation					
At 1 April 2020	121,394	40,887	45,790	25,122	233,193
Depreciation charge	-	221	2,837	838	3,896
At 31 March 2021	121,394	41,108	48,627	25,960	237,089
Depreciation charge	-	92	2,411	279	2,782
At 31 March 2022	121,394	41,200	51,038	26,239	239,871
Carrying amount					
At 31 March 2022	-	-	1,868	-	1,868
At 31 March 2021	-	92	2,938	279	3,309



MMTC TRANSNATIONAL PTE. LTD.
(Company Registration No.: 199407265M)
NOTES TO THE FINANCIAL STATEMENTS
FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2022

5. RIGHT-OF-USE-ASSETS

The Company has lease contracts for office premises. The Company is restricted from assigning and subleasing the leased assets.

Carrying amounts of right-of-use assets classified as below:

	2022 US\$	2021 US\$
Office premises		
At 1 April	-	87,859
Additions	175,642	-
Depreciation for the year	(87,821)	(87,859)
At 31 March	<u>87,821</u>	<u> </u>

6. OTHER ASSETS

Non-current
Refundable deposits
Other assets are denominated in Singapore Dollar.

	2022 US\$	2021 US\$
Refundable deposits	<u>27,265</u>	<u>27,279</u>

7. CASH AND CASH EQUIVALENTS

Cash at banks
Cash on hand
Fixed deposits

	2022 US\$	2021 US\$
Cash at banks	14,401,073	3,033,330
Cash on hand	504	59
Fixed deposits	4,222,773	8,904,930
	<u>18,624,350</u>	<u>11,938,319</u>

Cash and cash equivalents are denominated in the following currencies:

	2022 US\$	2021 US\$
United States Dollar	18,605,420	11,916,383
Singapore Dollar	18,930	21,936
	<u>18,624,350</u>	<u>11,938,319</u>

At the reporting date, fixed deposits bear interest rates ranging from 0.40% to 0.55% (2021: 0.50% to 1.10%) per annum with the maturity period of 12 months (2021: 12 months). Weighted average effective interest rate is 0.46% (2021: 0.80%) per annum.

At reporting date, fixed deposits of US\$4,222,773 (2021:US\$8,904,930) are pledged as security granted for the borrowings (Note 11).

For the purpose of presenting the statement of cash flows, cash and cash equivalents comprise the following:

	2022 US\$	2021 US\$
Cash and cash equivalents (as above)	18,624,350	11,938,319
Fixed deposits	(4,222,773)	(8,904,930)
Margin on letter of credit	(14,189,475)	(2,000,000)
	<u>212,102</u>	<u>1,033,389</u>

MMTC TRANSNATIONAL PTE. LTD.
(Company Registration No.: 199407265M)
NOTES TO THE FINANCIAL STATEMENTS
FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2022

8. TRADE AND OTHER RECEIVABLES

	<u>2022</u> US\$	<u>2021</u> US\$
<u>Trade receivables</u>		
Third parties	35,190,427	37,886,988
Holding company	-	91,830
	<u>35,190,427</u>	<u>37,978,818</u>
<u>Other receivables</u>		
Interest receivable from fixed deposit	10,672	53,688
GST receivables	2,592	2,820
	<u>13,264</u>	<u>56,508</u>
Total trade and other receivables	<u>35,203,691</u>	<u>38,035,326</u>

Trade receivables are non-interest bearing and repayable within the normal trade credit terms granted to the customers ranging from 30 to 180 days (2021 : 30 to 180 days).

Trade and other receivables are denominated in the following currencies:

	<u>2022</u> US\$	<u>2021</u> US\$
United States Dollar	35,201,099	38,032,506
Singapore Dollar	2,592	2,820
	<u>35,203,691</u>	<u>38,035,326</u>

9. TRADE AND OTHER PAYABLES

	<u>2022</u> US\$	<u>2021</u> US\$
<u>Trade payables</u>		
Third parties	34,954,502	31,876,249
<u>Other payables</u>		
Accruals	115,741	124,987
Total trade and other payables	<u>35,070,243</u>	<u>32,001,236</u>

Trade payables are non-interest bearing and repayable within the trade credit terms granted by the suppliers of 30 days (2021: 30 days).

Trade and other payables are denominated in the following currencies:

	<u>2022</u> US\$	<u>2021</u> US\$
United States Dollar	34,954,502	31,876,249
Singapore Dollar	115,741	124,987
	<u>35,070,243</u>	<u>32,001,236</u>

10. OTHER LIABILITIES

	<u>2022</u> US\$	<u>2021</u> US\$
Contract liabilities	3,247,358	-

Contract liabilities is recognised for the advances received from the customers and is derecognised as and when the performance obligation is satisfied.



MMTC TRANSNATIONAL PTE. LTD.
(Company Registration No.: 199407265M)

NOTES TO THE FINANCIAL STATEMENTS
FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2022

11. BORROWINGS

	<u>2022</u> US\$	<u>2021</u> US\$
Trust receipts	6,270,000	6,726,484
Short-term loan	<u>2,999,000</u>	<u>600,000</u>
	<u>9,269,000</u>	<u>7,326,484</u>

Trust receipts amounting to NIL (2021: US\$3,215,834) at the reporting date bear interest rate at interest rate of NIL (2021: 2.38%) per annum with maturity of NIL (2021: 57 days) from the reporting date; US\$1,300,000 (2021: US\$3,510,650) at the reporting date bear interest rate at 2.77% (2021: 2.61%) per annum with maturity of 70 days (2021: 14 to 30 days) from the reporting date. The remaining trust receipts amount to US\$4,970,000 (2021: NIL) at the reporting date bear interest rate at interest rate of 3.06% (2021: NIL) per annum with maturity of 64 days (2021: NIL) from the reporting date

The short-term loan at the reporting date bears effective interest rate of 3.06% to 3.33% (2021: 2.70%) per annum. The short-term loan has a maturity period of 90 days (2021: 90 days) from the reporting date.

Borrowings of US\$9,296,000 (2021: US\$7,326,484) are secured over goods and receivables financed by the bank and Deed of Charge over fixed deposits (Note 7) of the Company of US\$4,222,773 (2021: US\$8,904,930).

Borrowings are denominated in United States Dollar.

12. LEASE LIABILITIES

	<u>2022</u> US\$	<u>2021</u> US\$
<u>Current</u>		
Lease liabilities	<u>90,629</u>	<u>-</u>

(a) Amount recognised in profit or loss

	<u>2022</u> US\$	<u>2021</u> US\$
Depreciation of right-of-use assets	87,821	87,859
Interest expense on lease liabilities	<u>3,860</u>	<u>1,400</u>
Total amount recognised in profit and loss	<u>91,681</u>	<u>89,259</u>

(b) Total Cash outflow

The company had a total cash outflow for lease liabilities of US\$91,800 (2021: US\$90,366)

Lease liability is denominated in Singapore Dollar.

13. SHARE CAPITAL

	<u>2022</u>	<u>2021</u>	<u>2022</u>	<u>2021</u>
	<u>Number of</u>		<u>US\$</u>	<u>US\$</u>
	<u>ordinary shares</u>			
Issued and fully paid ordinary shares				
At 1 April and 31 March	<u>1,461,502</u>	<u>1,461,502</u>	<u>1,000,000</u>	<u>1,000,000</u>

The holders of ordinary shares are entitled to receive dividends as and when declared by the Company. All ordinary shares carry one vote per share without restrictions. The ordinary shares have no par value.

MMTC TRANSNATIONAL PTE. LTD.
(Company Registration No.: 199407265M)
NOTES TO THE FINANCIAL STATEMENTS
FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2022

14. REVENUE INCOME

	2022	2021
	US\$	US\$
Sale of commodities		
- third parties	456,453,965	485,964,133
- holding company	121,500	233,988
	<u>456,575,465</u>	<u>486,198,121</u>

All the sales are recognised at a point in time.

15. OTHER INCOME

	2022	2021
	US\$	US\$
Demurrage and despatch	191,655	1,515,137
Interest income on bank deposits	34,651	183,035
Interest income from third parties	18,657	305,678
	53,308	488,713
Sundry income	9,557	66,324
	<u>254,520</u>	<u>2,070,174</u>

16. EMPLOYEE COMPENSATION

	2022	2021
	US\$	US\$
Directors' remuneration (Note 20b)	241,049	259,430
Directors' benefits (Note 20b)	120,075	145,019
Directors' contribution to defined contribution plan including Central Provident Fund and SDL (Note 20b)	18,364	17,614
Staff salaries and wages	223,975	211,146
Staff bonus	16,401	24,465
Staff welfare	7,401	6,374
Employer's contribution to defined contribution plan including Central Provident Fund and SDL	31,601	28,916
	<u>658,866</u>	<u>692,964</u>

17. FINANCE COSTS

	2022	2021
	US\$	US\$
Interest expense on:		
- lease liabilities	3,860	1,400
- bill discounting	17,893	23,412
- short term loan	84,918	116,487
- trust receipts interest	294,147	344,249
	<u>400,818</u>	<u>485,548</u>

18. OTHER EXPENSES

	2022	2021
	US\$	US\$
Local conveyance - others	7,973	7,848
Office expenses	15,153	17,138
Professional fees	12,463	12,579
Other expenses	34,711	28,926
	<u>70,300</u>	<u>66,491</u>



MMTC TRANSNATIONAL PTE. LTD.
(Company Registration No.: 199407265M)
NOTES TO THE FINANCIAL STATEMENTS
FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2022

19. INCOME TAX EXPENSE

Major components of income tax expense for the financial year ended 31 March 2022 and 2021 were as follows:

	<u>2022</u> US\$	<u>2021</u> US\$
Current income tax		
- Current year	124,720	201,745
- (Over) provision in respect of prior years	-	(5,161)
	<u>124,720</u>	<u>196,584</u>

Relationship between tax expense and accounting profit

A reconciliation between tax expense and the product of accounting profit multiplied by the applicable corporate tax rate for the financial years ended 31 March 2022 and 2021 were as follows:

	<u>2022</u> US\$	<u>2021</u> US\$
Profit before tax	<u>815,204</u>	<u>1,314,762</u>
Income tax using tax statutory rate of 17% (2021:17%)	138,585	223,510
Adjustments:		
- Non-deductible expenses	453	474
- Income not subject to tax	(1,398)	(8,869)
- Income tax rebates	(12,920)	(12,789)
- Utilised unrecognised deferred tax asset	-	(581)
- (Over) provision in respect of prior years	-	(5,161)
	<u>124,720</u>	<u>196,584</u>

20. SIGNIFICANT RELATED PARTY TRANSACTIONS

(a) In addition to the related party information disclosed elsewhere in the financial statements, the following significant related party transactions between the Company and its related parties took place at terms agreed between the parties during the financial year:

	<u>2022</u> US\$	<u>2021</u> US\$
Sales to holding company	<u>121,500</u>	<u>233,988</u>

(b) Compensation paid to key management personnel

	<u>2022</u> US\$	<u>2021</u> US\$
Wages, salaries and bonus	241,049	259,430
Post-employment benefits – contribution to defined contribution plans	18,364	17,614
Benefits-in-kind	120,075	145,019
	<u>379,488</u>	<u>422,063</u>

21. DIVIDENDS

	<u>2022</u> US\$	<u>2021</u> US\$
<i>Dividends paid</i>		
First interim dividend paid in respect of financial year of 200 cents (2021: 250 cents) per share	2,000,000	2,500,000
Second interim dividend paid in respect of current financial year of 200 cents (2021: 50 cents) per share	2,000,000	500,000
Third interim dividend paid in respect of current financial year of 100 cents (2021: 90 cents) per share	1,000,000	900,000
	<u>5,000,000</u>	<u>3,900,000</u>

MMTC TRANSNATIONAL PTE. LTD.
(Company Registration No.: 199407265M)
NOTES TO THE FINANCIAL STATEMENTS
FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2022

22. FINANCIAL RISK MANAGEMENT

Financial risk management objectives and policies

The Company's activities expose it to a variety of financial risks from its operation. The key financial risks include credit risk, market risk (including interest rate risk and foreign currency risk) and liquidity risk.

The directors review and agree policies and procedures for the management of these risks, which are executed by the management team. It is, and has been throughout the current and previous financial year, the Company's policy that no trading in derivatives for speculative purposes shall be undertaken.

The following sections provide details regarding the Company's exposure to the above-mentioned financial risks and the objectives, policies and processes for the management of these risks.

There has been no change to the Company's exposure to these financial risks or the manner in which it manages and measures the risks.

Credit risk

Credit risk refers to the risk that the counter party will default on its contractual obligations resulting in a loss to the Company. The Company's exposure to credit risk arises primarily from trade and other receivables. For other financial assets (including cash and cash equivalents), the Company minimises credit risk by dealing exclusively with high credit rating counter parties.

The Company has adopted a policy of only dealing with creditworthy counter parties. The Company performs ongoing credit evaluation of its counter parties' financial condition and generally do not require a collateral.

The Company considers the probability of default upon initial recognition of asset and whether there has been a significant increase in credit risk on an ongoing basis throughout each reporting period.

The Company has determined the default event on a financial asset to be when internal and/or external information indicates that the financial asset is unlikely to be received, which could include default of contractual payments due for more than 180 days, or there is significant difficulty of the counter party.

To minimise credit risk, the Company has developed and maintained the Company's credit risk gradings to categorise exposures according to their degree of risk of default. The credit rating information is supplied by publicly available financial information and the Company's own trading records to rate its major customers and other debtors. The Company considers available reasonable and supportive forward-looking information which includes the following indicators:

- Internal credit rating
- External credit rating
- Actual or expected significant adverse changes in business, financial or economic conditions that are expected to cause a significant change to the debtor's ability to meet its obligations
- Actual or expected significant changes in the operating results of the debtor
- Significant increases in credit risk on other financial instruments of the same debtor
- Significant changes in the expected performance and behaviour of the debtor, including changes in the payment status of debtors in the group and changes in the operating results of the debtor.

Regardless of the analysis above, a significant increase in credit risk is presumed if a debtor is more than 90 days past due in making contractual payment.

The Company determined that its financial assets are credit-impaired when:

- There is significant difficulty of the debtor
- A breach of contract, such as a default or past due event
- It is becoming probable that the debtor will enter bankruptcy or other financial reorganisation
- There is a disappearance of an active market for that financial asset because of financial difficulty

The Company categorises a receivable for potential write-off when a debtor fails to make contractual payments more than 360 days past due. Financial assets are written off when there is evidence indicating that the debtor is in severe financial difficulty and the debtor has no realistic prospect of recovery.

The Company's current credit risk grading framework comprises the following categories:



MMTC TRANSNATIONAL PTE. LTD.
(Company Registration No.: 199407265M)
NOTES TO THE FINANCIAL STATEMENTS
FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2022

Category	Definition of category	Basis for recognising expected credit loss (ECL)
I	Counter party has a low risk of default and does not have any past due amounts.	12-month ECL
II	Amount is > 90 days past due or there has been a significant increase in credit risk since initial recognition	Lifetime ECL – not credit-impaired
III	Amount is > 180 days past due or there is evidence indicating the asset is credit-impaired (in default)	Lifetime ECL – credit-impaired
IV	There is evidence indicating that the debtor is in severe financial difficulty and the debtor has no realistic prospect of recovery	Amount is written off

	Note	Category	12-month or lifetime ECL	Gross carrying amount US\$	Loss allowance US\$	Net carrying amount US\$
31 March 2022						
Trade receivables	8	Note 1	Lifetime ECL (simplified)	35,190,427	-	35,190,427
Other receivables (i)	8	I	12-month ECL	10,672	-	10,672
31 March 2021						
Trade receivables (i)	8	Note 1	Lifetime ECL (simplified)	37,978,818	-	37,978,818
Other receivables	8	I	12-month ECL	53,688	-	53,688

(i) These amounts excluded GST receivables

Trade receivables (Note 1)

For trade receivables, the Company has applied the simplified approach in FRS 109 to measure the loss allowance at lifetime ECL. The Company determines the ECL by using a provision matrix, estimated based on historical credit loss experience based on the past due status of the debtors, adjusted as appropriate to reflect current conditions and estimates of future economic conditions. Accordingly, the credit risk profile of trade receivables is prescribed based on their past due status in terms of the provision matrix.

The Company believes that all receivables are collectible based on historical payment behaviours and credit worthiness of customers.

Excessive risk concentration

Concentrations arise when a number of counter parties are engaged in similar business activities, or activities in the same geographical region, or have economic features that would cause their ability to meet contractual obligations to be similarly affected by changes in economic, political or other conditions. Concentrations indicate the relative sensitivity of the Company's performance to developments affecting a particular industry.

Exposure to credit risk

The Company has no significant concentration of credit risk other than those balances with third party customers. The Company has credit policies and procedures in place to minimise and mitigate its credit risk exposure.

Other receivables

The Company assessed the latest performance and financial position of the counter parties, adjusted for future outlook of the industry in which the counter parties operate in and concluded that there have been no significant increase in the credit risk since the initial recognition of the financial assets. Accordingly, the Company measured the impairment loss using 12-month ECL and determined that ECL is insignificant.

MMTC TRANSNATIONAL PTE. LTD.
(Company Registration No.: 199407265M)
NOTES TO THE FINANCIAL STATEMENTS
FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2022

Market risk

Market risk is the risk that changes in market prices, such as interest rates and foreign exchange rates will affect the Company's income. The objective of market risk management is to manage and control market risk exposures within acceptable parameters, while optimising the return on risk.

Interest rate risk

Interest rate risk is the risk that the fair value or future cash flows of the Company's financial instruments will fluctuate because of changes in market interest rates. The Company's exposure to interest rate risk arises primarily from fixed deposits and borrowings.

At the reporting date, the interest rate profile of the Company's interest-bearing financial instruments was as follows:

	<u>2022</u>	<u>2021</u>
	US\$	US\$
Variable rate instruments		
Financial assets	4,222,773	8,904,930
Financial liabilities	(9,296,000)	(7,326,484)
	<u>(5,073,227)</u>	<u>1,578,446</u>

The Company does not expect any significant effect on the Company's profit or loss arising from the effects of reasonably possible changes to interest rates on interest bearing financial instruments at the end of the financial year.

At the reporting date, if the interest rates had been 0.5% (2021: 0.5%) higher or lower with all other variables held constant, the Company's profit or loss before tax would have been US\$25,366 lower (2021: US\$7,892 higher), arising mainly as a result of higher or lower interest income or expenses on floating rate cash at bank and floating rate bank borrowings. The assumed movement in basis points for interest rate sensitivity analysis is based on the currently observable market environment.

Foreign currency risk

The Company's foreign exchange risk results mainly from cash flows from transactions denominated in foreign currencies. At present, the Company does not have any formal policy for hedging against currency risk. The Company ensures that the net exposure is kept to an acceptable level by buying or selling foreign currencies at spot rates, where necessary, to address short term imbalances.

The Company has transactional currency exposures arising from sales or purchases that are denominated in a currency other than the functional currency of the Company, primarily Singapore dollar (SGD).

The Company's currency exposures to the SGD, at the reporting date was as follows:

	<u>SGD</u>
	<u>US\$</u>
2022	
Financial assets	
Cash and cash equivalents	18,930
Other assets	27,265
	<u>46,195</u>
Financial liabilities	
Trade and other payables	115,741
Lease liability	90,629
	<u>(206,370)</u>
Net financial liabilities currency exposures	<u>(160,175)</u>
2021	
Financial assets	
Cash and cash equivalents	21,936
Other assets	27,279
	<u>49,215</u>
Financial liabilities	
Trade and other payables	(124,987)
Net financial liabilities currency exposures	<u>(75,772)</u>



MMTC TRANSNATIONAL PTE. LTD.
(Company Registration No.: 199407265M)
NOTES TO THE FINANCIAL STATEMENTS
FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2022

Sensitivity analysis for foreign currency risk

The following table demonstrates the sensitivity of the Company's profit after tax to a reasonably possible change in SGD against the US\$ by 5% (2021: 5%) with all other variables being held constant, including tax rate, and the effects arising from the net financial liability position will be as follows:

SGD against US\$	Profit or loss (after tax)	
	2022 US\$	2021 US\$
- strengthened	(6,647)	(3,145)
- weakened	6,647	3,145

Liquidity risk

Liquidity risk refers to the risk that the Company will encounter difficulties in meeting its short-term obligations due to shortage of funds. The Company's exposure to liquidity risk arises primarily from mismatches of the maturities of financial assets and liabilities. It is managed by matching the payment and receipt cycles. The Company's objective is to maintain continuity of funding. The Company finances its working capital requirements through funds generated from operations. The directors are satisfied that funds are available to finance the operations of the Company.

Analysis of financial instruments by remaining contractual maturities

The table below summarises the maturity profile of the Company's financial assets and liabilities at the reporting date based on contractual undiscounted repayment obligations.

	<u>Carrying amount</u> US\$	<u>Contractual cash flows</u> US\$	<u>One year or less</u> US\$	<u>One to five years</u> US\$
2022				
<u>Financial assets</u>				
Other assets	27,265	27,265	-	27,265
Cash and cash equivalents	18,624,350	18,624,350	18,624,350	-
Trade and other receivables (i)	35,201,099	35,201,099	35,201,099	-
Total undiscounted financial assets	53,852,714	53,852,714	53,825,449	27,265
<u>Financial liabilities</u>				
Trade and other payables	35,070,243	35,070,243	35,070,243	-
Borrowings	9,269,000	9,286,996	9,286,996	-
Lease liabilities	90,629	91,879	91,879	-
Total undiscounted financial liabilities	(44,429,872)	(44,449,118)	(44,449,118)	
Total net undiscounted financial assets	9,422,842	9,403,596	9,376,331	27,265

(i) These amounts excluded GST receivables

2021

<u>Financial assets</u>				
Other assets	27,279	27,279	-	27,279
Cash and cash equivalents	11,938,319	11,938,319	11,938,319	-
Trade and other receivables	38,032,506	38,032,506	38,032,506	-
Total undiscounted financial assets	49,998,104	49,998,104	49,970,825	27,279

MMTC TRANSNATIONAL PTE. LTD.
(Company Registration No.: 199407265M)
NOTES TO THE FINANCIAL STATEMENTS
FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2022

Analysis of financial instruments by remaining contractual maturities (contd.)

Financial liabilities

Trade and other payables	32,001,236	32,001,236	32,001,236	-
Borrowings	7,326,484	7,329,110	7,329,110	-
Total undiscounted financial liabilities	(39,327,720)	(39,330,346)	(39,330,346)	-
Total net undiscounted financial assets	10,670,384	10,667,758	10,640,479	27,279

(i) These amounts excluded GST receivables

23. FAIR VALUE OF FINANCIAL INSTRUMENTS

Assets and liabilities measured at fair value

The fair value of a financial instrument is the amount at which the instrument could be exchanged or settled between knowledgeable and willing parties in an arm's length transaction, other than in a forced or liquidation sale.

The following methods and assumptions are used to estimate the fair value of each class of financial instruments for which it is practicable to estimate that value.

Cash and cash equivalents, other receivables, other payables

The carrying amounts of these balances approximate their fair values due to short-term nature of these balances.

Trade receivables and trade payables

The carrying amounts of these receivables and payables approximate their fair values as they are subject to normal trade credit terms.

Borrowings

The carrying amounts of borrowings and lease liability approximate their fair values as they are subject to interest rates close to market rate of interests for similar arrangements with financial institutions

24. CAPITAL MANAGEMENT

The primary objective of the Company's capital management is to ensure that it maintains a strong credit rating and net current asset position in order to support its business and maximise shareholder value. The capital structure of the Company comprises issued share capital and retained earnings.

The Company manages its capital structure and makes adjustments to it, in light of changes in economic conditions. To maintain or adjust the capital structure, the Company may adjust the dividend payment to shareholders, return capital to shareholders or issue new shares. The Company is not subject to any externally imposed capital requirements. No changes were made to the objectives, policies or processes during the financial years ended 31 March 2022 and 31 March 2021.

25. FINANCIAL INSTRUMENTS BY CATEGORY

At the reporting date, the aggregate carrying amounts of financial assets and financial liabilities at amortised cost were as follows:

	2022	2021
	US\$	US\$
Financial assets measured at amortised cost		
Other assets	27,265	27,279
Cash and cash equivalents	18,624,350	11,938,319
Trade and other receivables (i)	35,201,099	38,032,506
	<u>53,852,714</u>	<u>49,998,104</u>
Financial liabilities measured at amortised cost		
Trade and other payables	35,070,243	32,001,236
Borrowings	9,269,000	7,326,484
	<u>44,339,243</u>	<u>39,327,720</u>

(i) These amounts excluded GST receivables

AUTHORISATION OF FINANCIAL STATEMENTS FOR ISSUE

The financial statements of the Company for the financial year ended 31 March 2022 were authorised for issue in accordance with a resolution of the Board of directors of the Company as at the date of the Directors' Statement.

MMTC LIMITED

CONSOLIDATED FINANCIAL STATEMENTS

for the financial year ended 31st March, 2022



कार्यालय प्रधान निदेशक लेखापरीक्षा,
उद्योग एवं कॉर्पोरेट कार्य
ए.जी.सी.आर. भवन, आई.पी. एस्टेट,
नई दिल्ली-110 002



OFFICE OF THE PRINCIPAL DIRECTOR OF AUDIT,
INDUSTRY AND CORPORATE AFFAIRS
A.G.C.R. BUILDING, I.P. ESTATE,
NEW DELHI-110 002

संख्या: एएमजी-1/8(9)/ एमएमटीसी (सीएफएस)/
वार्षिक लेखा/ (2021-22)/2022-23/358 -59
दिनांक: 14 SEP 2022

सेवा में

अध्यक्ष एवं प्रबंध निदेशक
एम एम् टी सी लिमिटेड,
कोर - 1, स्कोप कॉम्प्लेक्स,
7, इंस्टीट्यूशनल एरिया, लोधी रोड,
नई दिल्ली - 110 003

विषय: कंपनी अधिनियम 2013 की धारा 143(6) (b) के साथ धारा 129(4) के अंतर्गत 31 मार्च 2022 को समाप्त वर्ष के लिए एम् एम् टी सी लिमिटेड के समेकित वार्षिक लेखों पर भारत के नियंत्रक एवं महालेखापरीक्षक की टिप्पणियाँ।

महोदय,

कंपनी अधिनियम 2013 की धारा 143(6) (b) के साथ धारा 129(4) के अंतर्गत 31 मार्च 2022 को समाप्त वर्ष के लिए लिए एम् एम् टी सी लिमिटेड के समेकित वार्षिक लेखों पर उपरोक्त विषय संबंधित संलग्न पत्र अंग्रेषित है।

भवदीया ,

रमेश.ए.पंडा
(एस. आह्लादिनी पंडा)
प्रधान निदेशक लेखा परीक्षा
(उद्योग एवं कारपोरेट कार्य)
नई दिल्ली

संलग्नक:- यथोपरि



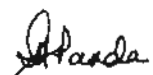
COMMENTS OF THE COMPTROLLER AND AUDITOR GENERAL OF INDIA UNDER SECTION 143(6)(b) READ WITH SECTION 129 (4) OF THE COMPANIES ACT, 2013 ON THE CONSOLIDATED FINANCIAL STATEMENTS OF MMTC LIMITED FOR THE YEAR ENDED 31 MARCH 2022

The preparation of consolidated Financial Statements of MMTC Limited for the year ended 31 March 2022 in accordance with the financial reporting framework prescribed under the Companies Act, 2013 (Act) is the responsibility of the management of the Company. The Statutory Auditor appointed by the Comptroller and Auditor General of India under section 139(5) read with section 129 (4) of the Act is responsible for expressing opinion on the financial statements under section 143 read with section 129 (4) of the Act based on independent audit in accordance with the standards on auditing prescribed under section 143(10) of the Act. This is stated to have been done by them vide their Audit Report dated 08 July 2022.

I, on behalf of the Comptroller and Auditor General of India, have conducted a supplementary audit of the consolidated financial statements of MMTC Limited for the year ended 31 March 2022 under section 143(6)(a) read with section 129 (4) of the Act. We conducted a supplementary audit of the financial statements of MMTC Limited (the Company), but did not conduct supplementary audit of the financial statements of Neelachal Ispat Nigam Limited (Joint Venture)¹ for the year ended on that date. Further, section 139 (5) and 143 (6)(a) of the Act are not applicable to five Joint Ventures/Subsidiary (Annexure), being private entities/entity incorporated in foreign country under the respective laws, for appointment of their statutory auditor and for conduct of supplementary audit. Accordingly, Comptroller and Auditor General of India has neither appointed the statutory auditors nor conducted the supplementary audit of these companies. This supplementary audit has been carried out independently without access to the working papers of the statutory auditor and is limited primarily to inquiries of the statutory auditor and company personnel and a selective examination of some of the accounting records.

On the basis of my supplementary audit nothing significant has come to my knowledge which would give rise to any comment upon or supplement to statutory auditors' report under section 143(6) (b) read with section 129(4) of the Act.

**For and on behalf of
Comptroller & Auditor General of India**


(S. Ahladini Pandā)
Principal Director of Audit
(Industry & Corporate Affairs)
New Delhi

Place: New Delhi

Date: 14 SEP 2022

¹ Accounts not received for audit as on 13.09.2022

Annexure

Details of Joint Ventures/subsidiary of MMTC Limited

Sl. No.	Name of the Company	JV/Subsidiary	Status
1.	MMTC Gitanjali Limited	Joint Venture	Private entities
2.	MMTC PAMP India Pvt. Ltd.	Joint Venture	Private entities
3.	SICAL Iron Ore Terminal Limited	Joint Venture	Private entities
4.	Free Trade Ware-housing Pvt. Limited	Joint Venture	Private entities
5.	MMTC Transnational Pte. Ltd.	Subsidiary	Incorporated in foreign country



INDEPENDENT AUDITOR'S REPORT

TO THE MEMBERS OF MMTCL LIMITED

Report on the Consolidated Financial Statements

Qualified Opinion

We have audited the accompanying Consolidated financial statements of **MMTCL Limited** (hereinafter referred as "the Holding Company"), and its subsidiary Company (Holding Company & its subsidiary together referred to as "the Group"), and its joint venture entities which comprise the consolidated Balance Sheet as at 31st March, 2022, and the consolidated statement of Profit and Loss (including other comprehensive income), and the consolidated Statement of Cash Flows and consolidated Statement of Changes in Equity for the year then ended, and notes to the consolidated financial statements including a summary of significant accounting policies and other explanatory information (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 Companies Act, 2013 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 Group and its joint venture entities as at March 31, 2022, of consolidated loss and its total comprehensive income (Comprising of net loss and total comprehensive loss) consolidated change in equity and its consolidated cash flows for the year then ended.

Basis of Qualified Opinion

1. We draw attention to note no 17 of the accompanying consolidated financial statement, which states that the quarterly returns or statements of current assets are filed by the company with banks on the basis of provisional monthly information statement prepared for internal purposes. As per Notification of Ministry of Corporate affairs ("MCA") dated 24 March 2021, in regards with amendments to schedule III of division II the Company is required to disclose the quarterly reconciliation of statements in agreement with the books. As informed by the management given the volume and nature of business the reconciliation of these statements could not be performed and material discrepancy if any could not be determined. Thus, the required disclosure has not been presented in the financial statement.
2. We draw attention to note no 36(k) of the accompanying consolidated financial statement, which states that there are several provisions for doubtful recoverable amounting to INR 1.13 crore, the recoverability assessment of these balances could not be performed due to non-availability of sufficient information. The company has initiated an internal note to prepare a guideline to assess the recoverability of such balances. As per the management these provisions made relates to balances outstanding for a significant period of time and no sufficient evidence is available for recovery of these accounts, but due to non-availability of any internal guidelines these provisions have not been written off. Accordingly, the provisions and respective recoverable balances would have been reduced by INR. 1.13 crore.
3. We draw attention to note no 40(f)(a) of the accompanying financial statement, which states that the liability @1.5% of profit before tax ("PBT") for the year in respect of scheme for retirees prior to 01.01.2007 (closed group) has not been recognized even though the Company has reported PBT of INR. 120.60 crore, on the basis of affordability. Also, the Company has not provided form PRMBS (open group) @ 4.5% of Basic and DA for serving employees. During the year provision in respect of retirees after 01.01.2007 pertaining to FY 2019-20 and 2020-21 has been withdrawn due to loss during these previous years. The management will review the above in the next financial year. The non-recognition of provision according to the schemes above constitutes a departure from the accounting standards as prescribed under section 133 of the Act. An amount of INR. 1.81 crore (1.5% of PBT) and INR. 3.29 crore (4.5% of Basic and DA) estimated by the management, should have been provided as per the accounting standards. Accordingly, the provision for PRMBS would have been increased by INR. 5.10 crore and net income and shareholders' fund would have been reduced by the given amount.

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 and its joint venture entities in accordance with the ethical requirements that are relevant to our audit of the consolidated financial statements in India in terms of the Code of Ethics issued by the Institute of Chartered Accountants of India and the relevant provisions of the Companies Act, 2013, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the consolidated financial statements of the current period. These matters were addressed in the context of our audit of the consolidated financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

Sr. No.	Key Audit Matter	Auditor's Response
1.	We draw attention to the need for replacing the existing old ERP with integrated and latest ERP system. In the absence of the one, the recent changes in laws such as Depreciation Schedule in Companies Act, introduction of GST etc. are not seamlessly captured in the system.	We performed following test in detail to ensure that all the entries passed in different accounting packages / software have been duly mapped in the preparation of financial statements as on Balance Sheet date: <ul style="list-style-type: none"> • Performed cut off procedure • Performed reconciliation of entries passed in different platforms
2.	Refer note no. 34 on the claims not acknowledged as debt incorporating therein claims on account of pending legal cases. There is large number of cases pending before various adjudicating authorities. These legal cases involve significant judgement to determine the possible outcome of those disputes and independent legal assessment to pursue the case. The holding company has 5 regional offices, 1 Sub-regional office and different divisions to handle the trade activities including accounting of that particular activity. However, in lot of cases the legal cases are pursued at corporate office level while related financial information / transactions are dealt at RO level, thereby difficulties are faced in giving a comprehensive and holistic treatment to the transaction.	We obtained list of all the pending legal cases handled at Corporate office legal division on 31st March 2022 with a note from management on the changes in the status of the cases from that of last year. We considered the effect of information provided by the management and analysed the impact of financial obligation of the Company. It was suggested to management to have legal cases and financial obligation if any at the same location in order to have clarity in reporting in financial statement.
3.	Refer note no.11B include advance to related parties wherein interest income on loan/advance given to Neelachal Ispat Nigam Ltd. has not been recognized as an income during the year.	In view of the significance of the matter, we applied following audit procedures in this area, among others to obtain sufficient appropriate evidence. We discussed the matter with the management to understand the possibility of recovery of interest. Considered the appropriateness of Company's revenue recognition policy and its compliance in terms of INDAS 115 Revenue recognition. Assessed the relevant disclosures made in the financial statements.
4.	Assessment of impairment of investment in subsidiary and joint ventures(Refer note no. 6) The company as at 31st March, 2022 has non-current and current investments.	Our audit procedures include but we are not limited to the following: Obtained and understanding of the management process. Discussed extensively with management regarding impairment indicators and evaluated the design and testing operating effectiveness of controls. Assessed the methodology used by the management to estimate the recoverability of investment and ensured that it is consistent with applicable accounting standards.
5.	Refer Note No 32 (ii) on provision on Anglo Coal	In view of the significance of the matter, we applied following audit procedures: Obtained and understanding of relevant documents in relation to the matters of anglo coal. Discussed with management regarding the possible impact and shown in the financial statement.



Emphasis of Matters

Restructuring and default in loan repayment

We draw attention to Note No. 17 of the accompanying consolidated financial Statements, which states that the Company had requested all lender banks for restructuring of loan in terms of RBI Circular no. RBI/2020-21/16 DOR No.BP/BC/3/21.04.048/2020-21 dated 06.08.2020 for resolution of Covid-19 related stress, the loan was further restructured as on 08.06.2021 wherein the due date of loan and interest repayment was 30.03.2022 with a review period of 30 days. Total outstanding bank loan and interest was to be paid in one go on or before 29.04.2022 (30 days review period after 30.03.2022), mainly out of NINL divestment. As bank loan along with interest could not be repaid on due date/ review period due to non-receipt of disinvestment proceeds of NINL, MMTC account with all lender banks has been downgraded to Sub-standard/ NPA w.e.f. 08.06.2021 ie. The date of loan restructuring. Penal provisions were applicable as per loan restructuring agreements and other legislations and penal/card rate of interest was to be charged on default amount. Consequent upon receipts of divestment proceeds from NINL on 4.7.2022 an amount of INR. 2551.44 Crore as on 31.3.2022 have been paid towards principal and normal agreed interest upto 31.3.2022. Further as on 6.7.2022 statement have been obtained and lenders have provided statement with only penal interest form 1.4.2022 till date of payment of complete loan balances. The Company has taken up with the lenders, during Joint lenders meet "JLM" held on 07.07.2022 to waive off all the penal and other charges including penal/card rate charges prior to 01.04.2022 if any.

Our opinion is not modified in respect of the above matter.

Non-compliance of regulation 33 of SEBI

We draw attention to Note No. 34(vii) to the accompanying consolidated financial statements, which states that the Company has created a contingent liability of INR 0.07 crore on account of demand raised by Stock Exchange Board of India (SEBI) in relation to non-compliance of regulation 33 of SEBI. The management is in the process of having these demands waived and thus no provision has been made in the financial statements

Our opinion is not modified in respect of the above matter.

Management's Responsibility 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 requirement of the Companies Act, 2013 ("the Act") that give a true and fair view of the consolidated financial position, consolidated financial performance and consolidated cash flows of the Group including its joint venture entities 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 Company included in the Group and of its joint venture entities are responsible for the maintenance of adequate accounting records in accordance with the provisions of the Act for the safeguarding of 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 design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the consolidated financial statement 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 and of its associates and jointly controlled entities are responsible for assessing ability of the Group and of its joint venture entities to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Board of Directors either intends to liquidate the 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 and of its joint venture entities are also responsible for overseeing the financial reporting process of the Group and of its associates and joint venture entities.

Auditors' 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 and its joint venture entities 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 and its joint venture entities 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 and its joint venture entities 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 entity included in the Consolidated Financial Statements of which we are not the statutory auditors regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

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

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

Other Matters

1. We did not audit the financial statements / financial information of one wholly-owned subsidiary incorporated in Singapore – MMTC Transnational Pte Ltd whose financial statement reflect total assets of INR.408.70 Crore, net assets of INR.46.50 crore. as at 31st March 2022, total revenues of INR. 3404.33 Crore and net cash outflow of INR.6.12 Crore and total net profit of INR.6.86 Crore for the year ended on that date, as considered in the consolidated financial statements.
2. The consolidated financial statements also include the Group's share of net profit (including other comprehensive income) of INR. 11.55 Crore for the year ended 31 March 2022 as considered in the consolidated financial statements in respect of joint venture M/s MMTC Pamp India Pvt. Ltd. whose financial statements/financial information have not been audited by us.
3. The consolidated financial statements do not include Group's share of loss in five joint ventures company, M/s Free Trade Warehousing Pvt. Limited and Sical Iron Ore Terminal Limited, TM Mining Company Limited, MMTC Geetanjali Limited and Neelachal Ispat Nigam Limited (NINL) as the Group's share of its accumulated losses has exceeded the carrying value of the investment in respective aforesaid joint ventures of the Holding Company. The financial statements / financial information of these joint venture companies have neither been audited by us nor any financial statements (audited/unaudited) have been furnished to us by the Holding Company's Management and our opinion on the Consolidated financial statements, in so far as it relates to the amounts and disclosures included in respect of the subsidiary and six joint ventures, and our report in terms of the sub section (3) and (11) of Section 143 of the Act, in so far as it relates to the aforesaid subsidiary and joint ventures is based solely on the report of the other auditors. The financial statements of subsidiary in Singapore have been adjusted by the Holding Company's Management in accordance with the accounting principles generally accepted in India including Indian Accounting Standards.
4. There have been no qualifications or adverse remarks by the respective auditors in the Companies (Auditor's Report) Order (CARO) reports of the companies included in the consolidated financial statement.

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/financial information certified by the Management.

Report on Other Legal and Regulatory Requirements

1. 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) Except for the effects of the matter described in Basis for qualified opinion paragraph, 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 appears from our examination of those books and report of other auditors.
 - c) The Consolidated Balance Sheet, the Consolidated Statement of Profit and Loss, the Consolidated Cash Flow Statement and Consolidated Statement of Changes in Equity 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) Except for the effects of the matter described in Basis for qualified opinion paragraph, in our opinion, the aforesaid consolidated financial statements comply with the Accounting Standards specified under Section 133 of the Act, read with Rule 7 of the Companies (Accounts) Rules, 2014 relevant rules issued thereunder.
- e) The matters described in the 'Basis of Qualified Opinion' and 'Emphasis of Matter' paragraphs above, in our opinion may have an adverse effect on the functioning of the Company;
- f) Being a Government Company pursuant to the Notification No. GSR 463(E) dated 5 June 2015 issued by the Ministry of Corporate Affairs, Government of India, provisions of sub-section (2) of Section 164 of the Act, are not applicable to the Holding Company.
- g) 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-1"
- h) With respect to the other matters to be included in the Auditor's Report in accordance with Rule 11 of the Companies (Audit and Auditors) Rules, 2014, in our opinion and to the best of our information and according to the explanations given to us :
- i. There are pending litigations including matters relating to sales tax, custom duty and excise duty which are disclosed as contingent liability - refer to Note No. 34 to the consolidated financial statements, the impact of the same is unascertainable as the matters are sub-judice.
- ii. Provision, has been made in the consolidated financial statement as required under the applicable law or accounting standards, for material foreseeable losses, if any, on long-term contracts including derivative contracts.
- iii. The Company has not transferred INR. 127 to the Investor education and protection fund.
- iv. (a) The Management has represented that, to the best of its knowledge and belief, no funds (which are material either individually or in the aggregate) have been advanced or loaned or invested (either from borrowed funds or share premium or any other sources or kind of funds) by the Company to or in any other person or entity, including foreign entity ("Intermediaries"), with the understanding, whether recorded in writing or otherwise, that the Intermediary shall, whether, directly or indirectly lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the Company ("Ultimate Beneficiaries") or provide any guarantee, security or the like on behalf of the Ultimate Beneficiaries (Refer note 51(e)).
- (b) The Management has represented, that, to the best of its knowledge and belief, no funds (which are material either individually or in the aggregate) have been received by the Company from any person or entity, including foreign entity ("Funding Parties"), with the understanding, whether recorded in writing or otherwise, that the Company shall, whether, directly or indirectly, lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the Funding Party ("Ultimate Beneficiaries") or provide any guarantee, security or the like on behalf of the Ultimate Beneficiaries (Refer note 51(f))
- (c) Based on the audit procedures that have been considered reasonable and appropriate in the circumstances, nothing has come to our notice that has caused us to believe that the representations under sub-clause (i) and (ii) of Rule 11(e), as provided under (a) and (b) above, contain any material misstatement.
- v. The Company has not declared or paid any dividend during the year ended 31 March 2022.

For M.L. Puri & Co.
Chartered Accountants
FRN: 002312N

Place: New Delhi
Date: 08.07.2022
UDIN: 22095584AMPFEX8636

CA. R.C. Gupta
Partner
M No.: 095584

**Annexure-1 to the Independent Auditor's Report of even date on the
Consolidated Financial Statements of MMTC Ltd.**

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

We have audited the internal financial controls over financial reporting of MMTC Ltd. ("the Company") as of March 31, 2022, in conjunction with our audit of the consolidated financial statements of the Company for the year ended on that date

Management's Responsibility for Internal Financial Controls:

The respective Board of Directors of the Holding company, its subsidiary company, its associate companies and joint ventures, which are companies incorporated in India, are responsible for establishing and maintaining internal financial controls based on "the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India (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

Auditor's Responsibility:

Our responsibility is to express an opinion on the Company's internal financial controls over financial reporting based on our audit. We conducted our audit in accordance with the Guidance Note on Audit of Internal financial controls over financial reporting and the Standards on Auditing, issued by the ICAI deemed to be prescribed under section 143(10) of the Companies Act, 2013, to the extent applicable to an audit of internal financial controls, both applicable to an audit of Internal Financial Controls and, both issued by the ICAI. Those standards and the Guidance Note 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 were 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 the internal control based on the assessed risk. The procedures selected depend on the auditor's judgment, including the assessment of risks of material misstatements of the financial statements, whether due to fraud or error.

We believe that the audit evidence we have obtained and the audit evidence obtained by the other auditors in terms of their reports referred to in the Other Matters paragraph below, is sufficient and appropriate to provide a basis for our audit opinion on the Company's internal financial controls system over financial reporting.

Meaning of Internal Financial Controls over Financial Reporting:

A company's internal financial control over financial reporting is a process designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles. A company's internal financial control over financial reporting includes those policies and procedures that

- (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 the preparation of financial statements in accordance with generally accepted principles, and that receipts and expenditures of the company are being made only in accordance with authorizations of management and directors of the company; and
- (3) Provide reasonable assurance regarding the 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.



Other Matters

1. Our aforesaid reports under Section 143(3)(l) of the Act on the adequacy and operating effectiveness of the internal financial controls over financial reporting in so far as it relates to four joint ventures, which are companies incorporated in India, is based on the corresponding reports of the auditors of such companies incorporated in India.
2. We are not able to comment on the adequacy and operating effectiveness of the internal financial controls over financial reporting in so far as it relates to two joint ventures, which are companies incorporated in India and corresponding reports of the auditors of such companies incorporated in India has not been received.

Our report is not modified on the above matters.

Opinion:

In our opinion, the Holding Company and its joint ventures, which are companies incorporated in India, 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, 2022, based on “the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India”.

For M.L. Puri & Co.
Chartered Accountants
FRN: 002312N

Place: New Delhi
Date: 08.07.2022
UDIN: 22095584AMPFEX8636

CA. R.C. Gupta
Partner
M No.: 095584

MANAGEMENT'S REPLY TO AUDITOR'S OBSERVATIONS IN THE AUDIT REPORT ON CONSOLIDATED FINANCIAL STATEMENTS FOR 2021-22

Sl. No.	AUDITORS' OBSERVATION	MANAGEMENT'S REPLY
	Qualified Opinion	
1.	We draw attention to note no 16 of the accompanying financial statement, which states that the quarterly returns or statements of current assets are filed by the company with banks on the basis of provisional monthly information statement prepared for internal purposes. As per Notification of Ministry of Corporate affairs ("MCA") dated 24 March 2021, in regards with amendments to schedule III of division II the Company is required to disclose the quarterly reconciliation of statements in agreement with the books. As informed by the management given the volume and nature of business the reconciliation of these statements could not be performed and material discrepancy if any could not be determined. Thus the required disclosure has not been presented in the financial statement	MMTC has entered into one time loan restructuring with banks. After NINL divestment bank liabilities have been discharged. Accordingly there may not be further need to submit stock statement in future as MMTC business has been severally downsized as per MOC directions and their may not be requirement of bank credit at this stage. Further MMTC has received NIL comments from CAG for 2021-22.
2.	We draw attention to note no 35(d) of the accompanying financial statement, which states that There are several provisions for doubtful recoverable amounting to INR 1.13 crore, the recoverability assessment of these balances could not be performed due to non-availability of sufficient information. The company has initiated an internal note to prepare a guideline to assess the recoverability of such balances. As per the management these provisions made relates to balances outstanding for a significant period of time and no sufficient evidence is available for recovery of these accounts, but due to non-availability of any internal guidelines these provisions have not been written off. Accordingly, the provisions and respective recoverable balances would have been reduced by INR. 1.13 crore.	These cases are more than two decade old and required documents are not available. Matter will be taken to BOD in current F.Y. MMTC has received NIL comments from CAG for 2021-22
3.	We draw attention to note no 39(f)(a) of the accompanying financial statement, which states that the liability @1.5% of profit before tax ("PBT") for the year in respect of scheme for retirees prior to 01.01.2007 (closed group) has not been recognised even though the Company has reported PBT of INR. 120.60 crore, on the basis of affordability. Also, the Company has not provided form PRMBS (open group) @4.5% of Basic and DA for serving employees. During the year provision in respect of retirees after 01.01.2007 pertaining to FY 2019-20 and 2020-21 has been withdrawn due to loss during these previous years. The management will review the above in the next financial year. The non-recognition of provision according to the schemes above constitutes a departure from the accounting standards as prescribed under section 133 of the Act. An amount of INR. 1.81 crore (1.5% of PBT) and INR. 3.29 crore (4.5% of Basic and DA) estimated by the management, should have been provided as per the accounting standards. Accordingly, the provision for PRMBS would have been increased by INR. 5.10 crore and net income and shareholders' fund would have been reduced by the given amount.	DPE guidelines provides for contribution based on profit (PBT) keeping in view affordability and sustainability as guiding principle. Accordingly it has been decided by the Company that in view of complete downsize/ stoppage of business activities not to make provisions at this stage. CAG has not make any negative comments on this issue.



Sl. No.	AUDITORS' OBSERVATION	MANAGEMENT'S REPLY
	Key Audit Matters	
1.	<p>Refer note no. 33 on the claims not acknowledged as debt incorporating therein claims on account of pending legal cases. There are a large number of cases pending before various adjudicating authorities. These legal cases involve significant judgement to determine the possible outcome of those disputes and independent legal assessment to pursue the case.</p> <p>The company has 6 regional offices and different divisions to handle the trade activities including accounting of that particular activity. However, in lot of cases the legal cases are pursued at corporate office level while related financial information / transactions are dealt at RO level, thereby difficulties are faced in giving a comprehensive and holistic treatment to the transaction.</p> <p>Auditor's Response:</p> <p>We obtained list of all the pending legal cases handled at Corporate office legal division on 31st March 2022 with a note from management on the changes in the status of the cases from that of last year. We considered the effect of information provided by the management and analysed the impact of financial obligation of the Company.</p> <p>It was suggested to management to have legal cases and financial obligation if any at the same location in order to have clarity in reporting in financial statement.</p>	<p>Institution of legal cases depends upon the jurisdiction of the court as per the Civil procedure code 1908(CPC). The jurisdiction is determined mainly on the ground of:</p> <p>a) Pecuniary Value b) Territorial jurisdiction of a court c) Subject matter</p> <p>Likewise in case of immovable property the suit is instituted where the immovable property is situated.</p> <p>The regional office which has executed a particular agreement and which is the keeper of the records is more suitable and appropriate to pursue the case before court.</p> <p>However when matters reaches the Supreme Court, then matter is dealt with at corporate office.</p> <p>MMTC has received NIL comments from CAG for 2021-22. In case of closure of ROs/SROs, camp offices with minimum manpower will be retained to take care of ongoing legal cases.</p>
	Emphasis of Matters	
	<p>Restructuring and default in loan repayment</p> <p>We draw attention to Note No. 16 of the accompanying financial Statements, which states that the Company had requested all lender banks for restructuring of loan in terms of RBI Circular no. RBI/2020-21/16 DOR No.BP/BC/3/21.04.048/2020-21 dated 06.08.2020 for resolution of Covid-19 related stress, the loan was further restructured as on 08.06.2021 wherein the due date of loan and interest repayment was 30.03.2022 with a review period of 30 days. Total outstanding bank loan and interest was to be paid in one go on or before 29.04.2022 (30 days review period after 30.03.2022), mainly out of NINL divestment. As bank loan along with interest could not be repaid on due date/ review period due to non-receipt of disinvestment proceeds of NINL, MMTC account with all lender banks has been downgraded to Sub-standard/ NPA w.e.f. 08.06.2021 ie. the date of loan restructuring. Penal provisions were applicable as per loan restructuring agreements and other legislations and penal/card rate of interest was to be charged on default amount. Consequent upon receipts of divestment proceeds from NINL on 4.7.2022 an amount of INR. 2551.44 crore as on 31.3.2022 have been paid towards principal and normal agreed interest upto 31.3.2022. Further as on 6.7.2022 statement have been obtained and lenders have provided payment with only penal interest form 1.4.2022 till date of payment of complete loan balances. The Company has taken up with the lenders, during Joint lenders meet "JLM" held on 07.07.2022 to waive off all the penal and other charges including penal/card rate charges prior to 01.04.2022 if any.</p>	<p>Consequent upon receipts of divestment proceeds from NINL on 4.7.2022 an amount of Rs 2551.44 crore as on 31.3.2022 have been paid towards principal and normal agreed interest upto 31.3.2022. Company has paid principal and normal interest and taking up positively with lenders for relaxation of penal interest, processing fee, other charges. An amount of Rs 111.24 crore relating to interest and RTR has been accounted in June 22 quarter out of which Rs 50.30 crore pertains to normal interest charged from 1.4.2022 till 6.7.2022 and remaining amount of Rs 60.94 crore relates to provision of interest and RTR their on. MMTC has received NIL comments from CAG for 2021-22.</p>

Sl. No.	AUDITORS' OBSERVATION	MANAGEMENT'S REPLY
	Emphasis of Matters	
2.	<p><u>Non-compliance of regulation 33 of SEBI</u></p> <p>We draw attention to Note No. 33 (vi) to the accompanying financial statements, which states that the Company has created a contingent liability of INR 0.07 crore on account of demand raised by Stock Exchange Board of India (SEBI) in relation to non-compliance of regulation 33 of SEBI. The management is in the process of having these demands waived and thus no provision has been made in the financial statements</p> <p>Our opinion is not modified in respect of the above matter.</p>	<p>The Company has taken up with the Stock Exchanges for waiver of demand for non compliance of Regulation 33 of SEBI.</p> <p>MMTC has received NIL comments from CAG for 2021-22.</p>



MMTC Limited			
Consolidated Balance Sheet as at March 31, 2022			
(₹ in Crores)			
Particulars	Note No	As at March 31, 2022	As at March 31, 2021
ASSETS			
Non-current assets			
Property, Plant and Equipment	3	30.69	34.57
Right to Use Assets	3	3.65	3.36
Capital work-in-progress	3	-	-
Investment Property	4	3.70	3.87
Other intangible assets	5	0.23	0.39
Investments accounted for using the equity method	6A	91.42	79.87
Financial Assets			
Investments	6B	11.03	2.23
Trade Receivables	7A	-	-
Loans	8	2.27	3.49
Others	9	45.58	47.50
Deferred tax Assets (net)	10	214.41	555.44
Other non-current Assets	11A	24.04	24.75
Current Assets			
Inventories	12	29.80	45.65
Financial Assets			
Investments	6C	-	-
Trade Receivables	7B	401.65	834.11
Cash & Cash Equivalents	13	152.44	155.00
Bank Balances other than above	14	49.45	98.65
Loans	8	0.99	1.36
Others	9	8.90	27.02
Current Tax Assets (net)	15	3.61	2.64
Other Current Assets	11B	3,709.53	3,546.12
Assets held for Sale	6D	-	7.8
Total Assets		4,783.39	5,473.86
Equity and Liabilities			
Equity			
Equity Share Capital	16A	150.00	150.00
Other Equity	16B	(298.09)	(50.26)
Non Controlling Interest		-	-
Liabilities			
Non-current liabilities			
Financial Liabilities			
Borrowings	17A	-	-
Lease Liabilities	19A	4.14	3.61
Provisions	20A	37.40	44.03
Current liabilities			
Financial Liabilities			
Borrowings	17B	2,621.65	2,417.85
Trade payables			
Total outstanding dues of micro and small enterprise	18	0.18	0.03
Total outstanding dues of creditors other than micro and small enterprise"		534.20	998.28
Lease Liabilities	19B	0.13	0.35
Other Financial Liabilities	19C	219.37	209.30
Other current liabilities	21	410.13	772.22
Provisions	20B	1,082.00	926.97
Current Tax Liabilities (net)	22	22.28	1.48
Total Equity and Liabilities		4,783.39	5,473.86

See accompanying notes to Financial Statements 1 to 57

As per our report of even date attached

For and on behalf of Board of Directors

For M. L. Puri & Co.

Chartered Accountants

F.R. No.: 002312N

(CA. R C Gupta)

Partner

M. No. 095584

Date: 08.07.2022

Place: New Delhi

(G. Anandanarayanan)

Company Secretary

ACS-13691

(J Ravi Shanker)

Director

DIN: 06961483

(B.N. Dash)

Chief General Manager(F&A)

(Kapil Kumar Gupta)

Director (F) & CFO

DIN:08751137

(Vibhu Nayar)

Chairman and Managing Director

DIN: 03590141

MMTC Limited			
Consolidated Statement of Profit and Loss for the year ended March 31, 2022			
(₹ in Crores)			
Particulars	Note No	As at March 31, 2022	As at March 31, 2021
Income			
Revenue From Operations	23	11,796.24	30,001.47
Other Income	24	17.73	17.67
Total Income (I)		11,813.97	30,019.14
Expenses			
Cost of Material Consumed	25	107.40	75.51
Purchase of Stock in Trade	26	10,544.17	28,348.17
Changes in Inventories of Finished Goods, Stock in Trade and Work in Progress	27	11.75	161.82
Employees' Benefits Expenses	28	119.32	140.21
Finance Costs	29	208.93	202.09
Depreciation, Impairment & Amortization Expenses	30	5.31	5.69
Other Expenses	31	572.46	1,321.61
Total expenses (II)		11,569.34	30,255.10
Profit/(Loss) before Exceptional Items and Tax (I-II)		244.63	(235.96)
Exceptional Items - Expense/(Income)	32	155.20	877.18
Profit Before Tax and Share of Equity Accounted Investees		89.43	(1,113.14)
Share of Profit/(Loss) of Joint Ventures Accounted for Using the Equity Method (Net of Income Tax)		11.65	0.79
Profit / (Loss) before tax		101.08	(1,112.35)
Tax Expenses	33		
i) Current Tax		22.43	1.46
ii) Adjustment relating to prior periods		-	0.07
iii) Deferred tax		341.03	(324.60)
Total Tax Expense		363.46	(323.07)
Profit / (Loss) for the year (A)		(262.38)	(789.28)
Profit / (Loss) for the Year Attributable to :			
Owners of the parent		262.38)	(789.28)
Non-controlling interest		-	-
Profit / (Loss) for the year		(262.38)	(789.28)
Other Comprehensive Income / (Loss)			
Items that will not be reclassified to Profit or Loss:			
- Remeasurements of the Defined Benefit Plans		11.90	6.93
- Equity Instruments through Other Comprehensive Income		0.97	1.07
- Income Tax effect		-	-
- Share of Other Comprehensive Income in Joint Ventures (net of tax)		(0.10)	0.34
Items that will be reclassified to Profit or Loss:			
-Exchange Differences in Translating the Financial Statements of Foreign Operation		1.78	(2.79)
Other Comprehensive Income / (Loss) net of tax (B)		14.55	5.55
Total Comprehensive Income / (Loss) for the year (A+B)		(247.83)	(783.73)
Total Comprehensive Income / (Loss) Attributable to :			
Owners of the parent		(247.83)	(783.73)
Non-controlling interest		-	-
Total Comprehensive Income / (Loss) for the year		(247.83)	(783.73)
Earnings per equity share :			
Basic & Diluted	46	(1.75)	(5.26)

See accompanying notes to Financial Statements 1 to 57
As per our report of even date attached
For **M. L. Puri & Co.**
Chartered Accountants
F.R. No.: 002312N

For and on behalf of Board of Directors

(CA. R C Gupta)
Partner
M. No. 095584
Date: 08.07.2022
Place: New Delhi

(G. Anandanarayanan)
Company Secretary
ACS-13691

(J Ravi Shanker)
Director
DIN: 06961483

(B.N. Dash)
Chief General Manager(F&A)

(Kapil Kumar Gupta)
Director (F) & CFO
DIN:08751137

(Vibhu Nayar)
Chairman and Managing Director
DIN: 03590141



MMTC Limited			
Cash Flow Statement For The Year Ended March 31, 2022			
(₹ in Crore)			
Particulars	For the year ended March 31, 2022		For the year ended March 31, 2021
A. CASH FLOW FROM OPERATING ACTIVITIES			
Net Profit before tax		101.08	(1,112.35)
Adjustment for:-			
Loss on valuation of inventories	0.01		1.59
Depreciation & amortisation expense	5.31		5.69
Net Foreign Exchange (gain)/loss	4.42		(11.89)
(Profit) /Loss on sale of PPE & Right to Use Assets	(0.04)		(1.37)
Provision for diminution in value of non current investment	0.01		-
Interest income	(4.16)		(8.31)
Dividend income	(0.08)		(0.07)
Finance Costs	208.82		201.60
Interest Expense on Lease	0.11		0.49
Debts/claims written off	0.02		5.80
CSR expenditure	0.05		0.89
Allowance for Bad & Doubtful Debts / claims/ advances	1.05		1.06
Provision no longer Required	(23.22)		(0.29)
Liabilities Written Back	(9.15)		(4.38)
Provision for DWA risk	-		0.08
Share of (profit)/ loss of joint ventures accounted for using the equity method (net of income tax)	(11.65)		(0.79)
		171.50	190.10
Operating Profit before Working Capital Changes		272.58	(922.25)
Adjustment for :-			
Inventories	15.84		170.47
Trade Receivables	450.29		1,210.48
Loans & Other Financial Assets	21.62		10.50
Other current & non current assets	(111.72)		(70.01)
Trade payables	(454.88)		344.81
Other Financial Liabilities	10.60		6.58
Other current & non current liabilities	(362.31)		65.96
Provisions	160.25	(270.31)	879.34
		2.27	1,695.88
Taxes Paid		(2.60)	7.66
Net cash flows from operating activities		(0.33)	1,703.54
B. CASH FLOW FROM INVESTING ACTIVITIES			
Purchase of fixed assets	(1.39)		(0.42)
Sale of fixed Assets	0.04		2.61
Sale/(Purchase) of Investments	0.01		0.02
Interest received	4.16		8.31
Dividend Received	0.08	2.90	0.07
Net cash flows from investing activities		2.90	10.59
C. CASH FLOW FROM FINANCING ACTIVITIES			
Borrowings	203.80		(1,431.69)
Finance Costs	(208.82)		(201.60)
Lease (Interest)	(0.11)		(0.49)
Dividend (inclusive of dividend distribution tax) paid	-	(5.13)	(1,633.78)
Net Cash From Financing Activities		(5.13)	(1,633.78)
D. Net changes in Cash & Cash equivalents		(2.56)	80.35
E. Opening Cash & Cash Equivalents (Note No 13)		155.00	74.65
F. Closing Cash & Cash Equivalents (Note No 13)		152.44	155.00

Note:

1. The above cash flow statement has been prepared under the "indirect method" as set out in Ind AS 7 on Statement of Cash Flows.
2. Adjustments for certain accruals/deferrals made at Corporate Office on the basis of information received from branch offices.
3. Cash and Cash Equivalents consist of:-

(₹ in crore)

Particulars	As at March 31, 2022	As at March 31, 2021
Balances with Banks		
(a) in Current Account	115.84	62.93
(b) In term deposit with original maturity upto 3 months	15.57	57.92
(c) Debit balance in Cash Credit Account	20.96	33.99
Cheques / Drafts / Stamps on hand	-	-
Cash on hand	0.07	0.16
	152.44	155.00

As per our report of even date attached

For and on behalf of Board of Directors

For M. L. Puri & Co.
 Chartered Accountants
 F.R. No.: 00002312N

(CA. R C Gupta)
 Partner
 M. No. 095584

(G. Anandanarayanan)
 Company Secretary
 ACS-13691

(B.N. Dash)
 Chief General Manager(F&A)

(Kapil Kumar Gupta)
 Director (F) & CFO
 DIN:08751137

Date: 08.07.2022
 Place: New Delhi

(J Ravi Shanker)
 Director
 DIN: 06961483

(Vibhu Nayar)
 Chairman and Managing Director
 DIN: 03590141

MMTC LIMITED

Consolidated Statement of Changes in Equity for the period ended 31.03.2022

(₹ in crore)

(₹ in crore)

Particulars	No of Shares	Amount
Balance as at 1.4.2021	1,500,000,000	150.00
Changes in Equity Share Capital during the year	-	-
Balance as at 31.3.2022	1,500,000,000	150.00

Particulars	No of Shares	Amount
Balance as at 1.4.2020	1,500,000,000	100.00
Changes in Equity Share Capital during the year	-	-
Balance as at 31.3.2021	1,500,000,000	150.00

B. Other Equity as at March 31, 2022

(₹ in crore)

	Reserves and Surplus			Items of Other Comprehensive Income				Total		
	Equity Components of compound financial instruments	Bond Redemption Reserve	Research & Development Reserve	General Reserve	Retained Earnings	Equity Instruments through OCI	Exchange differences on translating the financial statements of a foreign operation		Other items of OCI	Attributable to the owners of the parent
Balance as at 1.4.2021	1.13	8.30	-	598.89	(657.20)	(8.93)	14.14	(6.59)	(50.26)	(50.26)
Changes in accounting policy or prior period errors	-	-	-	-	-	-	-	-	-	-
Total comprehensive income for the year	-	-	-	-	(262.38)	0.97	1.78	11.80	(247.83)	(247.83)
Dividend and DDT	-	-	-	-	-	-	-	-	-	-
Unamortized premium on forward contract	-	-	-	-	-	-	-	-	-	-
Items recognized directly in retain earnings	-	-	-	-	-	-	-	-	-	-
Re-measurements of defined benefit plans	-	-	-	-	-	-	-	-	-	-
Any other changes	-	-	-	-	-	-	-	-	-	-
Balance as at 31.3.2022	1.13	8.30	-	598.89	(919.58)	(7.96)	15.92	5.21	(298.09)	(298.09)

Other Equity as at March 31, 2021

(₹ in crore)

	Reserves and Surplus			Items of Other Comprehensive Income				Total		
	Equity Components of compound financial instruments	Bond Redemption Reserve	Research & Development Reserve	General Reserve	Retained Earnings	Equity Instruments through OCI	Exchange differences on translating the financial statements of a foreign operation		Other items of OCI	Attributable to the owners of the parent
Balance as at 1.4.2020	1.13	8.30	-	598.89	132.08	(10.00)	16.93	(13.86)	733.47	733.47
Changes in accounting policy or prior period errors	-	-	-	-	-	-	-	-	-	-
Total comprehensive income for the year	-	-	-	-	(789.28)	1.07	(2.79)	7.27	(783.73)	(783.73)
Dividend and DDT	-	-	-	-	-	-	-	-	-	-
Unamortized premium on forward contract	-	-	-	-	-	-	-	-	-	-
Items recognized directly in retain earnings	-	-	-	-	-	-	-	-	-	-
Re-measurements of defined benefit plans	-	-	-	-	-	-	-	-	-	-
Any other changes	-	-	-	-	-	-	-	-	-	-
Balance as at 31.3.2021	1.13	8.30	-	598.89	(657.20)	(8.93)	14.14	(6.59)	(50.26)	(50.26)

(₹ in crore)

Particulars	As at March 31, 2022	As at March 31, 2021
Dividend proposed	-	-
Dividend distribution tax on proposed dividend	-	-

As per our report of even date attached

For **M. L. Puri & Co.**
Chartered Accountants

F.R. No.: 00002312N

(**C.A. R C Gupta**)

Partner

M. No. 095584

Date: 08.07.2022

Place: New Delhi

(**G. Anandanarayanan**)

Company Secretary

ACS-13691

(**J Ravi Shanker**)

Director

DIN: 06961483

(**B.N. Dash**)

Chief General Manager(F&A)

(**Vibhu Nayyar**)

Chairman and Managing Director

DIN: 03590141

For and on behalf of Board of Directors

(**Kapil Kumar Gupta**)

Director (F) & CFO

DIN:08751137



MMTC LIMITED

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

1. General Information

Established in 1963 and domiciled in India, the Company is a Mini-Ratna public sector undertaking under the administrative control of Ministry of Commerce & Industry, Government of India. The registered office of the Company is situated at Core-1, Scope Complex, 7, Institutional Area, Lodi Road, New Delhi-110003, India. The company has 6 Regional Offices at various places in India and a wholly owned subsidiary MMTC Transnational Pte Ltd, at Singapore.

The principal activities of the Company are export of Minerals and import of Precious Metals, Non-ferrous metals, Fertilizers, Agro Products, coal and hydrocarbon etc. The company's trade activities span across various countries in Asia, Europe, Africa, Middle East, Latin America and North America.

2. Significant Accounting Policies

2.1 a) Statement of Compliance and basis of preparation of Financial Statements

The financial statements have been prepared in accordance with Indian Accounting Standards (Ind-AS) as notified under the Companies (Indian Accounting Standards) Rules, 2015 and subsequent amendments thereto. Accounting policies have been applied consistently to all periods presented in these financial statements. The Financial Statements are prepared under historical cost convention on going concern basis from the books of accounts maintained under accrual basis except for certain financial instruments which are measured at fair value and in accordance with the Indian Accounting Standards prescribed under the Companies Act, 2013

b) Basis of Consolidation

MMTC Limited together with its subsidiaries, associates & joint ventures is hereinafter referred to as 'the Group'. The Company consolidates entities which it owns or controls as per the provisions of Ind AS-110. The consolidated financial statements comprise the financial statements of the Company and its subsidiaries, associates & joint ventures. The financial statements of the Group companies are consolidated on a line-by-line basis and intra-group balances and transactions, including unrealized gain / loss from such transactions, are eliminated upon consolidation. These financial statements are prepared by applying uniform accounting policies in use at the Group. Non-controlling interests which represent part of the net profit or loss and net assets of subsidiaries that are not, directly or indirectly, owned or controlled by the group, are excluded.

Associates are entities over which the Group has significant influence but not control. Joint Ventures are entities in which the group has joint control and has rights to the net assets of the entity. Investments in associates and joint ventures are accounted for using the equity method of accounting as per the provisions of Ind AS-28. The investment is initially recognized at cost, and the carrying amount is increased or decreased to recognize the investor's share of the profit or loss of the investee after the acquisition date.

2.2 Functional & presentation currency

These financial statements are presented in Indian rupees, the national currency of India, which is the functional currency of the Company. All amounts included in the financial statements are reported in crores of Indian rupees (upto two decimal) except number of equity shares and per share data and when otherwise indicated.

2.3 Use of estimates and judgment

The preparation of financial statements requires judgements, estimates and assumptions to be made that affect the reported amount of assets and liabilities, disclosure of contingent liabilities on the date of financial statements and the reported amount of revenues and expenses during the reporting period. Difference between the actual results and estimates are recognised in the period in which the results are known/materialised.

2.4 Revenue Recognition

i) Trading Income

Revenue from sale of goods is measured at fair value of the consideration received or receivable, net of returns and allowances, trade discount and volume rebates. Revenue is recognized when the company satisfies a performance obligation by transferring the promised goods or services to a customer and the customer obtains control of the same and it is probable that the company will collect the consideration to which it is entitled in exchange for the goods or services that is transferred to the customer.

Purchases and Sales

- In case of certain commodities import of which is canalized through the company, imported on 'Government Account' against authorization letter issued by the Government of India, Purchase/ Sale is booked in the name of the Company
- Products are also traded through the commodity exchanges. Purchase/ Sale is booked in respect of trade done through different commodity exchanges and is backed by physical delivery of goods.



- c. Gold/Silver kept under deposit: As per the arrangements with the Suppliers of Gold/Silver, the metal is kept by the supplier with the company on unfixed price basis for subsequent withdrawal on loan or outright purchase basis.
- (i) Purchases include gold/silver withdrawn from consignment deposit of the supplier on outright purchase basis for sale to exporters, as per the scheme of Foreign Trade Policy being operated by the Company as a nominated agency.
- (ii) Purchase of Gold/Silver during the year for domestic sale is accounted for on withdrawal from the Gold/Silver consignment deposit of the supplier and fixation of price with the suppliers. The stock held by the company at year end as Gold/ Silver under Deposit is accounted for under current assets as 'stock towards unbilled purchases' and under current liability as 'amount payable towards unbilled purchases' at the bullion price prevailing as at the close of the year. However, customs duty paid in respect of balance in deposits is accounted for as prepaid expenses.
- (iii) Gold/silver withdrawn on loan basis from the Gold/Silver under deposit, are booked as loan given to customers and grouped under financial assets. The corresponding liability towards the stocks received from foreign suppliers is grouped under Trade Payable. Loan/Trade Payable are adjusted when purchases and sales are booked.
- d. In respect of Gold/Silver sourced domestically where price fixation is deferred, purchase is initially accounted for on the basis of invoice received from the supplier. The difference, if any, arising on price fixation is accounted for through debit / credit note.
- e. In the case of gold/ silver supplied to exporters on replenishment basis, the purchase in respect of gold/silver booked by exporter by paying margin money, is booked after "fixing" the price with the foreign suppliers. However, sale is booked when quantity is actually delivered to exporters after completion of export.
- f. High Sea Sales
Sale during the course of import by transfer of documents of title i.e. high seas sale is booked upon transfer of documents of title to the goods, upon which buyer obtains control over the goods and the company becomes entitle to receive sales consideration, in favour of buyer before the goods cross the custom frontiers of India.
- ii) Other Operating Revenue
The income relating to the core activities of the company which are not included in revenue from sales / services for e.g. dispatch earned, subsidy, claims against losses on trade transactions, interest on credit sales and trade related advances (other than on overdue) etc., which are derived based on the terms of related trade agreements with business associates or schemes on related trade, are accounted for under 'Other Operating Revenue'.
- iii) Claims
Claims are recognized in the Statement of Profit & Loss (Net of any payable) on accrual basis including receivables from Govt. towards subsidy, cash incentives, reimbursement of losses etc, when its ultimate realisation is probable. Claims recognized but subsequently becoming doubtful are provided for through Statement of Profit and Loss. Insurance claims are accounted upon being accepted by the insurance company. Claims towards shortages/ damages including liquidated damages/ deficiencies in quality/quantity etc are accounted for in accordance with the provisions of relevant contracts. In case there is no such provisions in the existing contract, the claim is accounted for on receipt of acceptance by the party besides collectability of the claim amount being probable. On recognition of such claims the same will be realised/set off against advance received/claims payable etc. to the same party.
- iv) Service Income
Revenue from services is booked, when performance obligation is satisfied by transferring the promised services to the customers, for the consideration to which the company is entitled.
- v) Dividend and interest income
Dividend income from investments is recognized when the Company's right to receive payment is established and it is probable that the economic benefits associated with the transactions will flow to the Company and the amount of income can be measured reliably.
Interest income is recognised on a time proportion basis taking into account the amount outstanding and the effective interest rate, which is the rate that exactly discounts estimated future cash receipts through the expected life of the financial asset to the gross carrying amount of a financial asset.
- vi) Revenue Recognition on Actual Realization
Revenue is recognized on accrual basis except in the following items which are accounted for on actual realization since realisability of such items is uncertain, in accordance with the provisions of IndAS- 115:-
- a) Duty credit / exemption under various promotional schemes of Foreign Trade Policy in force, Tax credit, refund of custom duty on account of survey shortage, and refund of income-tax/service

tax/sales-tax/VAT/GST and interest thereon etc.

- b) Decrees pending for execution/contested dues and interest thereon, if any:
- c) Interest on overdue recoverable where realisability is uncertain.
- d) Liquidated damages on suppliers/underwriters.

2.5 Property, Plant and Equipments

The cost of an item of property, plant and equipment is 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. The cost of an item of PPE is the cash price equivalent at the recognition date. The cost of an item of PPE comprises:

- i) Purchase price, including import duties and non-refundable purchase taxes, after deducting trade discounts and rebates.
- ii) Costs directly attributable to bringing the PPE to the location and condition necessary for it to be capable of operating in the manner intended by management.
- iii) The initial estimate of the costs of dismantling and removing the item and restoring the site on which it is located, the obligation for which the company incurs either when the PPE is acquired or as a consequence of having used the PPE during a particular period for purposes other than to produce inventories during that period.

The company has chosen the cost model of recognition and this model is applied to an entire class of PPE. After recognition as an asset, an item of PPE is carried at its cost less any accumulated depreciation and any accumulated impairment losses.

Certain items of small value like calculators, wall clock, kitchen utensils etc. whose useful life is very limited and the cost of such item is upto ₹ 2000/- in each case, are directly charged to revenue in the year of purchase. Cost of mobile handsets is also charged to revenue irrespective of cost.

2.6 Intangible Assets

Identifiable intangible assets are recognized when the company controls the asset; it is probable that future economic benefits expected with the respective assets will flow to the company for more than one economic period; and the cost of the asset can be measured reliably. At initial recognition, intangible assets are recognized at cost. Intangible assets are amortized on straight line basis over estimated useful lives from the date on which they are available for use. Softwares are amortized over its useful life subject to a maximum period of 5 years or over the license period as applicable. Intangible assets upto ₹ 2,000/- in each case are directly charged to revenue.

No intangible assets arising from research is recognised and expense on research directly charged to profit and loss account when it is incurred. An intangible assets arising from development is recognised, if the asset fulfils the criteria for recognition as per Ind AS. Expenditure on an intangible item that was initially recognised as an expense is not recognised as part of the cost of an intangible asset at a later date.

2.7 Non-Current Assets Held for Sale

The company classifies a non-current asset (or disposal group of assets) as held for sale if its carrying amount will be recovered principally through a sale transaction rather than through continuing use. The non-current asset (or disposal group) classified as held for sale is measured at the lower of its carrying amount and the fair value less costs to sell.

2.8 Depreciation

Depreciation is provided on straight line method as per the useful lives approved by the Board of Directors, which are equal to those provided under schedule II of the Companies Act, 2013. The useful life of an asset is reviewed at each financial year-end. Each part of an item of PPE with a cost that is significant in relation to the total cost of the asset and if the useful life of that part is different from remaining part of the asset; such significant part is depreciated separately. Depreciation on all such items have been provided from the date they are 'Available for Use' till the date of sale / disposal and includes amortization of intangible assets and lease hold assets. Freehold land is not depreciated. An item of PPE is derecognized upon disposal or when no future economic benefits are expected to arise from the continued use of the asset.

The residual value of all the assets is taken as ₹ 1/-. The useful lives of the assets are taken as under:-



Name of Assets	Useful life as adopted by the company as per Schedule II
A. General Assets	
Furniture & Fittings	10
Office Equipment	5
Vehicles – Scooter	10
Vehicles – Car	8
Computers - Servers and networks	6
Computers – End User Devices	3
Lease-hold Land	As per Lease Agreement
Wagon Rakes	As per Agreement / Wagon Investment Scheme
Electrical installations excluding fans	10
Water Supply, Sewerage and Drainage	5
Roads	
Carpeted Roads – RCC	10
Carpeted Roads - Other than RCC	5
Non Carpeted Roads	3
Culverts	30
Buildings	
RCC	60
Other than RCC	30
Residential Flats (Ready Built)	
RCC	60
Other than RCC	30
Temporary Structure & wooden partition	3
Warehouse / Godown	30
B. Manufacturing Unit's Assets	
Factory Buildings	30
Electronic installations excluding fans	10
Water Supply, Sewerage and Drainage	5
Plant and Machinery	
Single Shift	15
Double Shift	10
Triple Shift	7.5
Plant and Machinery- Wind Energy Generation Plant	22
C. Fixed Assets created on Land and neither the Fixed Assets nor the Land belongs to the Company	
	5
D. Amortization of Intangible Assets	
Softwares	5 years or License period as applicable

2.9 Impairment

If the recoverable amount of an asset (or cash-generating unit) is estimated to be less than its carrying amount, the carrying amount of the asset (or cash-generating unit) is reduced to its recoverable amount. An impairment loss is recognized immediately in profit or loss, unless the relevant asset is carried at a revalued amount, in which case the impairment loss is treated as a revaluation decrease.

Recoverable amount is the higher of fair value less costs of disposal and value in use. In assessing value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset for which the estimates of future cash flows have not been adjusted.

When an impairment loss subsequently reverses, the carrying amount of the asset (or a cash-generating unit) is increased to the revised estimate of its recoverable amount, so that the increased carrying amount does not exceed the carrying amount that would have been determined had no impairment loss been recognized for the asset (or cash-generating unit) in prior years. A reversal of an impairment loss is recognized immediately in profit or loss, unless the relevant asset is carried at a revalued amount, in which case the reversal of the

impairment loss is treated as a revaluation increase.

At the end of each reporting period, the company reviews the carrying amounts of its tangible, intangible assets to determine whether there is any indication that those assets have suffered an impairment loss. If any such indication exists, the recoverable amount of the asset is estimated in order to determine the extent of the impairment loss (if any). When it is not possible to estimate the recoverable amount of an individual asset, the Company estimates the recoverable amount of the cash-generating unit to which the asset belongs. Intangible assets with indefinite useful lives and intangible assets not yet available for use are tested for impairment at least annually, and whenever there is an indication that the asset may be impaired.

Impairment of financial assets

Financial assets, other than those at Fair Value through Profit and Loss (FVTPL), are assessed for indicators of impairment at the end of each reporting period. Financial assets are considered to be impaired when there is objective evidence that, as a result of one or more events that occurred after the initial recognition of the financial asset, the estimated future cash flows of the investment have been affected. For Available for Sale (AFS) equity investments, a significant or prolonged decline in the fair value of the security below its cost is considered to be objective evidence of impairment.

For all other financial assets, objective evidence of impairment could include:

- Significant financial difficulty of the issuer or counterparty;
- Breach of contract, such as a default or delinquency in interest or principal payments;
- It becoming probable that the borrower will enter bankruptcy or financial re-organisation; or the disappearance of an active market for that financial asset because of financial difficulties.

For certain categories of financial assets, such as trade receivables, assets are assessed for impairment on individual basis. Objective evidence of impairment for a portfolio of receivables could include company's past experience of collecting payments, an increase in the number of delayed payments in the portfolio past the average credit period of zero days, as well as observable changes in national or local economic conditions that correlate with default on receivables.

For financial assets that are carried at cost, the amount of impairment loss is measured as the difference between the asset's carrying amount and the present value of the estimated future cash flows discounted at the current market rate of return for a similar financial asset. Such impairment loss will not be reversed in subsequent periods

The carrying amount of the financial asset is reduced by the impairment loss directly for all financial assets with the exception of trade receivables; such impairment loss is reduced through the use of an allowance account for respective financial asset. When a trade receivable is considered uncollectible, it is written off against the allowance account. Subsequent recoveries of amounts previously written off are credited against the allowance account. Changes in the carrying amount of the allowance account are recognized in profit or loss.

For financial assets measured at amortised cost, if, in a subsequent period, the amount of the impairment loss decreases and the decrease can be related objectively to an event occurring after the impairment was recognized, the previously recognized impairment loss is reversed through profit or loss to the extent that the carrying amount of the investment at the date the impairment is reversed does not exceed what the amortised cost would have been had the impairment not been recognized.

De-recognition of financial assets

The Company de-recognises a financial asset when the contractual rights to the cash flows from the asset expire, or when it transfers the financial asset and substantially all the risks and rewards of ownership of the asset to another party. If the Company neither transfers nor retains substantially all the risks and rewards of ownership and continues to control the transferred asset, The Company recognises its retained interest in the asset and an associated liability for amounts it may have to pay. If the Company retains substantially all the risks and rewards of ownership of a transferred financial asset, the Company continues to recognise the financial asset and also recognises a collateralised borrowing for the proceeds received.

On de-recognition of a financial asset in its entirety, the difference between the asset's carrying amount and the sum of the consideration received and receivable and the cumulative gain or loss that had been recognized in other comprehensive income and accumulated in equity is recognized in profit or loss.

2.10 Borrowing Costs

The Company capitalises borrowing costs that are directly attributable to the acquisition, construction or production of qualifying asset as a part of the cost of the asset.

The Company recognises other borrowing costs as an expense in the period in which it incurs them.

A qualifying asset is an asset that necessarily takes a substantial period of time to get ready for its intended use or sale.



2.11 Foreign currency translation

Transactions in currencies other than the functional currency are recognized at the rates of exchange prevailing at the dates of the transactions.

At the end of each reporting period, monetary items denominated in foreign currencies are retranslated at the rates prevailing at that date. Non-monetary items carried at fair value that are denominated in foreign currencies are re-translated at the rates prevailing at the date when the fair value was determined. Non-monetary items that are measured in terms of historical cost in a foreign currency are not retranslated.

Foreign currency monetary items (except overdue recoverable where realisability is uncertain) are converted using the closing rate as defined in the Ind AS-21. Non-monetary items are reported using the exchange rate at the date of the transaction. The exchange difference gain/loss is recognized in the Statement of Profit and Loss.

Liability in foreign currency relating to acquisition of fixed assets is converted using the closing rate. The difference in exchange is recognized in the Statement of Profit and Loss.

2.12 Inventory

Inventories are stated at the lower of cost and net realisable value. Net realisable value represents the estimated selling price for inventories less all estimated costs of completion and costs necessary to make the sale. The method of determination of cost and valuation is as under:

a) Exports:

- (i) Cost of export stocks is arrived at after including direct expenses incurred up to the point at which the stocks are lying. Similarly the realisable value is derived by deducting from the market price the expenses to be incurred from that point to the stage where they are sold.
- (ii) In respect of mineral ores the realisable value of ores is worked out at the minimum of the Fe/Mn contents of the grade of the ore as per export contract and is compared with the weighted average cost at weighted average Fe/Mn contents/weighted average moisture contents of the ore. The embedded stocks of Iron ore are excluded from inventory and hence not valued.

b) Imports:

- (i) The cost of imported stocks is arrived at by working out the yearly regional weighted average cost except for Non-ferrous Metals where weighted average cost of remaining stock after including all expenses incurred up to the point at which they are lying is considered. However, where stocks are specifically identifiable, actual cost of the material including all expenses incurred up to the point at which they are lying is considered.
- (ii) Gold/Silver purchased from foreign suppliers against booking by exporters under replenishment option and not delivered at the year-end are shown as stocks of company and valued at cost.

c) Domestic:

- (i) The cost of gold/silver medallions and silver articles is arrived at by working out the yearly location-wise weighted average cost of material and cost of opening stock. Costs include manufacturing/fabrication charges, wastages and other direct cost.
- (ii) In case of cut & polished stones and jewellery (finished/semi-finished) where stocks are specifically identifiable, actual cost of the material including all expenses incurred up to the point at which they are lying is considered. Costs include wastage and other direct manufacturing costs.

d) Packing material

Packing material is valued at lower of the cost or net realisable value.

e) Stocks with fabricators

Stocks with fabricators are taken as the stocks of the company, till adjustments

2.13 Provisions

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

2.14 Contingent Liabilities / Assets

Contingent Liabilities

Contingent liabilities are not recognized but disclosed in Notes to the Accounts when the company has possible obligation due to past events and existence of the obligation depends upon occurrence or non-occurrence of future events not wholly within the control of the company.

Contingent liabilities are assessed continuously to determine whether outflow of economic resources have become probable. If the outflow becomes probable then relative provision is recognized in the financial statements.

Where an entity is jointly and severally liable for an obligation, the part of the obligation that is expected to be met by other parties is treated as a contingent liability. The entity recognises a provision for the part of the obligation for which an outflow of resources embodying economic benefits is probable, except in the extremely rare circumstances where no reliable estimate can be made

Contingent Liabilities are disclosed in the General Notes forming part of the accounts

Contingent Assets

Contingent Assets are not recognised in the financial statements. Such contingent assets are assessed continuously and are disclosed in Notes when the inflow of economic benefits becomes probable. If it's virtually certain that inflow of economic benefits will arise then such assets and the relative income will be recognised in the financial statements.

2.15 Leases

An asset held under lease is classified as a finance lease if it transfers substantially all the risks and rewards incidental to ownership of an underlying asset.

An asset held under lease is classified as an operating lease if it does not transfer substantially all the risks and rewards incidental to ownership of an underlying asset.

The company normally enters into operating leases which are accounted for as under:-

- (i) Rental income from operating leases is recognized either on a straight-line basis or another systematic basis over the term of the relevant lease.
- (ii) Where the company is lessee, at commencement date right to use of assets are recognized at cost and the present value of lease payments that are not paid recognized as lease liability. Subsequently, right of use assets measured by using cost model with any adjustment required for re-measurement of lease liability and lease liability is measured by increasing the carrying amount to reflect the interest on lease liability, reducing the carrying amount to reflect the lease payments made and re-measuring the carrying amount to reflect any re-assessment or lease modifications.
- (iii) As a practical expedient, short term leases and leases for which the underlying assets is of low value upto ₹ 1,00,000/- per month or ₹ 12,00,000/-per year are not recognized as per the provisions given under Ind AS-116 (Leases) and are recognized as an expense on a straight line basis over the lease term.

2.16 Employee benefits

- i. Provision for gratuity, leave compensation and long service benefits i.e. service award, compassionate gratuity, employees' family benefit scheme and special benefit to MICA division employees is made on the basis of actuarial valuation using the projected unit credit method. Re-measurement, comprising actuarial gains and losses, the effect of the changes to the asset ceiling (if applicable) and the return on plan assets (excluding interest), is reflected immediately in the statement of financial position with a charge or credit recognized in other comprehensive income in the period in which they occur. Re-measurement recognized in other comprehensive income is reflected immediately in retained earnings and will not be reclassified to Statement of Profit or Loss and any change due to plan amendment, curtailment and settlement is considered for determining the current service cost, net interest, past service cost or gain/loss for settlement etc.
- ii. Provision for post-retirement medical benefit is made on defined contribution basis.
- iii. Provident fund contribution is made to Provident Fund Trust on accrual basis.
- iv. Payment of Ex-gratia and Notice pay on Voluntary Retirement are charged to revenue in the year incurred.
- v. Superannuation Pension Benefit, a defined contribution scheme is administered by Life Insurance Corporation of India (LIC). The Company makes contributions based on a specified percentage of each eligible employee's salary.

Short-term employee benefit obligations

Short-term employee benefit obligations are measured on an undiscounted basis and are recorded as expense as the related service is provided. A liability is recognized for the amount expected to be paid under PRP Scheme, if the Company has a present legal or constructive obligation to pay this amount as a result of past service provided by the employee and the obligation can be estimated reliably.

2.17 Taxation

Income tax expense represents the sum of the tax currently payable and deferred tax.

Current tax

The tax currently payable is based on taxable profit for the year. Taxable profit differs from 'profit before tax' as reported in the statement of profit or loss and other comprehensive income/statement of profit or loss because of items of income or expense that are taxable or deductible in other years and items that are never taxable or deductible. The Company's current tax is calculated using tax rates that have been enacted or substantively



enacted by the end of the reporting period.

Deferred tax

Deferred tax is recognized on temporary differences between the carrying amounts of assets and liabilities in the financial statements and the corresponding tax bases used in the computation of taxable profit. Deferred tax liabilities are generally recognized for all taxable temporary differences. Deferred tax assets are generally recognized for all deductible temporary differences to the extent that it is probable that taxable profits will be available against which those deductible temporary differences can be utilized. Such deferred tax assets and liabilities are not recognized if the temporary difference arises from the initial recognition (other than in a business combination) of assets and liabilities in a transaction that affects neither the taxable profit nor the accounting profit. In addition, deferred tax liabilities are not recognized if the temporary difference arises from the initial recognition of goodwill.

Deferred tax liabilities are recognized for taxable temporary differences associated with investments in subsidiaries and associates, and interests in joint ventures, except where the company is able to control the reversal of the temporary difference and it is probable that the temporary difference will not reverse in the foreseeable future. Deferred tax assets arising from deductible temporary differences associated with such investments and interests are only recognized to the extent that it is probable that there will be sufficient taxable profits against which to utilize the benefits of the temporary differences and they are expected to reverse in the foreseeable future.

The carrying amount of deferred tax assets is reviewed at the end of each reporting period and reduced to the extent that it is no longer probable that sufficient taxable profits will be available to allow all or part of the asset to be recovered.

Deferred tax liabilities and assets are measured at the tax rates that are expected to apply in the period in which the liability is settled or the asset realised, based on tax rates (and tax laws) that have been enacted or substantively enacted by the end of the reporting period.

Current and deferred tax for the year

Current and deferred tax are recognized in profit or loss, except when they relate to items that are recognized in other comprehensive income or directly in equity, in which case, the current and deferred tax are also recognized in other comprehensive income or directly in equity respectively. Where current tax or deferred tax arises from the initial accounting for a business combination, the tax effect is included in the accounting for the business combination.

Dividend Distribution Tax

Company is recognising the dividend distribution tax payable on payment of dividend under other equity since the dividend payable consequent upon approval of shareholders in Annual General Meeting is also presented under other equity.

Uncertainty over income tax treatments

Company while determining taxable profit (or loss), tax bases, unused tax losses, unused tax credits and tax rates, when there is uncertainty over income tax treatments under Ind AS 12 company is considering the probability of accepting the same treatment by income tax authorities and any change due to this adjusted retrospectively with cumulative effect by adjusting equity on initial application without adjusting comparatives.

2.18 Investment Property

Investment properties are properties held to earn rentals and/or for capital appreciation (including property under construction for such purposes). Investment properties are measured initially at cost, including transaction costs. All of the Company's property interests held under operating leases to earn rentals or for capital appreciation purposes are accounted for as investment properties. After initial recognition, the company measures investment property at cost.

An investment property is derecognized upon disposal or when the investment property is permanently withdrawn from use and no future economic benefits are expected from the disposal. Any gain or loss arising on de recognition of the property (calculated as the difference between the net disposal proceeds and the carrying amount of the asset) is included in profit or loss in the period in which the property is derecognized.

Investment properties are depreciated in accordance to the class of asset that it belongs and the life of the asset is as conceived for the same class of asset at the Company.

2.19 Earnings per share

A basic earnings per equity is computed by dividing the net profit attributable to the equity holders of the company by the weighted average number of equity shares outstanding during the period. Diluted earnings per equity share is computed by dividing the net profit attributable to the equity holders of the company by the weighted average number of equity shares considered for deriving basic earnings per equity share and also the weighted average number of equity shares that could have been issued upon conversion of all dilutive potential equity shares. The dilutive potential equity shares are adjusted for the proceeds receivable had the equity shares been actually issued at fair value (i.e. the average market value of the outstanding equity shares).

Dilutive potential equity shares are deemed converted as of the beginning of the period, unless issued at a later date. Dilutive potential equity shares are determined independently for each period presented.

The number of equity shares and potentially dilutive equity shares are adjusted retrospectively for all periods presented for any shares splits and bonus shares issues including for changes effected prior to the approval of the financial statements by the Board of Directors.

2.20 Discontinued operations

A discontinued operation is a component of the Company's business that represents a separate line of business that has been disposed off or is held for sale, or is a subsidiary acquired exclusively with a view to resale. Classification as a discontinued operation occurs upon the earlier of disposal or when the operation meets the criteria to be classified as held for sale.

2.21 Financial instruments

i) Non-derivative financial instruments

Non-derivative financial instruments consist of:

- financial assets, which include cash and cash equivalents, trade receivables, unbilled revenues, finance lease receivables, employee and other advances, investments in equity and debt securities and eligible current and non-current assets;
- Financial liabilities, which include long and short-term loans and borrowings, bank overdrafts, trade payables, eligible current and non-current liabilities.

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

Non derivative financial instruments are recognized initially at fair value including any directly attributable transaction costs. Financial assets are derecognized when substantial risks and rewards of ownership of the financial asset have been transferred. In cases where substantial risks and rewards of ownership of the financial assets are neither transferred nor retained, financial assets are derecognized only when the Company has not retained control over the financial asset.

Subsequent to initial recognition, non-derivative financial instruments are measured as described below:

a) Cash and cash equivalents

For the purposes of the cash flow statement, cash and cash equivalents include cash in hand, at banks and demand deposits with banks, net of outstanding bank overdrafts that are repayable on demand and are considered part of the Company's cash management system. In the statement of financial position, bank overdrafts are presented under borrowings within current liabilities.

b) Investments in liquid mutual funds, equity securities (other than Subsidiaries, Joint Venture and Associates) are valued at their fair value. These investments are measured at fair value and changes therein, other than impairment losses, are recognized in other comprehensive income and presented within equity, net of taxes. The impairment losses, if any, are reclassified from equity into statement of income. When an available for sale financial asset is derecognized, the related cumulative gain or loss recognised in equity is transferred to the statement of income.

c) Loans and receivables

Loans and receivables are non-derivative financial assets with fixed or determinable payments that are not quoted in an active market. They are presented as current assets, except for those maturing later than 12 months after the reporting date which are presented as non-current assets. Loans and receivables are initially recognized at fair value plus directly attributable transaction costs and subsequently measured at amortized cost using the effective interest method, less any impairment losses. Loans and receivables comprise trade receivables, unbilled revenues and other assets.

The company estimates the un-collectability of accounts receivable by analysing historical payment patterns, customer concentrations, customer credit-worthiness and current economic trends. If the financial condition of a customer deteriorates, additional allowances may be required.

d) Trade and other payables

Trade and other payables are initially recognized at fair value, and subsequently carried at amortized cost using the effective interest method. For these financial instruments, the carrying amounts approximate fair value due to the short term maturity of these instruments.

e) Investments in Subsidiary, Associates and Joint Venture

The company accounts investment in subsidiary, joint ventures and associates at cost

An entity controlled by the company is considered as a subsidiary of the company.



Investments in subsidiary company outside India are translated at the rate of exchange prevailing on the date of acquisition.

Investments where the company has significant influence are classified as associates. Significant influence is the power to participate in the financial and operating policy decisions of the investee but is not control or joint control over those policies.

A joint arrangement whereby the parties that have joint control of the arrangement have rights to the net assets of the joint arrangement is classified as a joint venture. Joint control is the contractually agreed sharing of control of an arrangement, which exists only when decisions about the relevant activities require unanimous consent of the parties sharing control.

ii) Derivative financial instruments

The Company is exposed to foreign currency fluctuations on foreign currency assets, liabilities, net investment in foreign operations and forecasted cash flows denominated in foreign currency.

The Company limits the effect of foreign exchange rate fluctuations by following established risk management policies including the use of derivatives. The Company enters into derivative financial instruments where the counterparty is primarily a bank.

Derivatives are recognized and measured at fair value. Attributable transaction costs are recognized in statement of income as cost.

Subsequent to initial recognition, derivative financial instruments are measured as described below:

a) Cash flow hedges

In respect of firm commitments and forecast transactions changes in the fair value of the derivative hedging instrument designated as a cash flow hedge are recognized in other comprehensive income and held in cash flow hedging reserve, net of taxes, a component of equity, to the extent that the hedge is effective. To the extent that the hedge is ineffective, changes in fair value are recognized in the statement of profit and loss and reported within foreign exchange gains/ (losses), net within results from operating activities. If the hedging instrument no longer meets the criteria for hedge accounting, then hedge accounting is discontinued prospectively. The cumulative gain or loss previously recognized in the cash flow hedging reserve is transferred to the statement of profit and loss upon the occurrence of the related forecasted transaction. If the forecasted transaction is no longer expected to occur, such cumulative balance is immediately recognized in the statement of profit and loss.

b) Others

Changes in fair value of foreign currency derivative instruments neither designated as cash flow hedges nor hedges of net investment in foreign operations are recognized in the statement of income and reported within foreign exchange gains/ (losses), net within results from operating activities.

Changes in fair value and gains/ (losses) on settlement of foreign currency derivative instruments relating to borrowings, which have not been designated as hedges are recorded in finance expenses.

2.22 Segment Information

The Chairman and Managing Director (CMD) of the Company has been identified as the Chief Operating Decision Maker (CODM) as defined by Ind AS-108, "Operating Segments." The CMD of the Company evaluates the segments based on their revenue growth and operating income.

The Company has identified its Operating Segments as Minerals, Precious Metals, Metals, Agro Products, Coal & Hydrocarbon, Fertilizer and General Trade/others.

The Assets and liabilities used in the Company's business that are not identified to any of the operating segments are shown as unallocable assets/liabilities. Management believes that it is currently not practicable to provide segment disclosures relating to total assets and liabilities since the assets are used interchangeably and hence a meaningful segregation of the available data is onerous.

2.23 Prior Period Errors

Errors of material amount relating to prior period(s) are disclosed by a note with nature of prior period errors, amount of correction of each such prior period presented retrospectively, to the extent practicable along with change in basic and diluted earnings per share. However, where retrospective restatement is not practicable for a particular period then the circumstances that lead to the existence of that condition and the description of how and from where the error is corrected are disclosed in Notes to Accounts. Taking into account the nature of activities of the company, prior period errors are considered material if the items of income / expenditure collectively (net) exceed 0.5% of sales turnover of the company.

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

3. Property, Plant and Equipment

(₹ in crore)

Particulars	Gross carrying value as at April 1, 2021	Additions	Disposal/ adjustments	Gross carrying value as at March 31, 2022	Accumulated depreciation as at April 1, 2021	Additions	Disposal/ adjustments	Accumulated depreciation as at March 31, 2022	Net Carrying Value as at March 31, 2022	Net Carrying Value as at March 31, 2021
Land freehold	0.37	-	-	0.37	-	-	-	-	0.37	0.37
- Office building	0.13	-	-	0.13	-	-	-	-	0.13	0.13
- Staff Quarters	-	-	-	-	-	-	-	-	-	-
Land leasehold	1.07	-	-	1.07	0.11	0.02	-	0.13	0.94	0.96
- Office building	1.85	-	-	1.85	0.78	0.22	-	1.00	0.85	1.07
- Staff Quarters Building	-	-	-	-	-	-	-	-	-	-
- Office Building	6.45	-	-	6.45	0.95	0.16	-	1.11	5.34	5.50
- Staff Quarters/Residential Flats	1.21	0.03	-	1.24	0.22	0.04	-	0.26	0.98	0.99
- Water supply, Sewerage & Drainage	0.06	-	-	0.06	0.05	-	-	0.05	0.01	0.01
-Electrical Installations	3.07	-	-	3.07	1.96	0.06	-	2.02	1.05	1.11
-Roads & Culverts	0.02	-	-	0.02	0.02	-	-	0.02	-	-
- Audio/Fire/Airconditioning	0.06	-	-	0.06	0.05	-	-	0.05	0.01	0.01
Plant & Equipment	40.60	-	(0.01)	40.59	17.85	2.89	(0.01)	20.73	19.86	22.75
Furniture & Fixtures	-	-	-	-	-	-	-	-	-	-
- Partitions	1.24	-	0.03	1.27	1.07	0.05	0.02	1.14	0.13	0.17
- Others	1.57	-	(0.01)	1.56	0.77	0.14	(0.01)	0.90	0.66	0.80
Vehicles	0.48	-	-	0.48	0.28	0.06	-	0.34	0.14	0.20
Office Equipments	1.88	0.02	(0.11)	1.79	1.63	0.14	(0.12)	1.65	0.14	0.25
Others:-	-	-	-	-	-	-	-	-	-	-
- Computer/ Data Processors	2.39	-	(0.01)	2.38	2.14	0.16	-	2.30	0.08	0.25
- Others (specify nature)	-	-	-	-	-	-	-	-	-	-
Total	62.45	0.05	(0.11)	62.39	27.88	3.94	(0.12)	31.70	30.69	34.57
Last Year	63.36	0.24	(1.15)	62.45	24.41	4.20	(0.73)	27.88	34.57	
Right to Use Assets	6.36	1.34	-	7.70	3.00	1.05	-	4.05	3.65	3.36
Last Year	7.4	0.14	(1.18)	6.36	2.26	1.04	-0.3	3.00	3.36	
Capital Work in Progress	-	-	-	-	-	-	-	-	-	-
Last Year	-	-	-	-	-	-	-	-	-	-

Refer Note No. 49

(a) Leasehold lands, roads and culverts, sewerage, drainage and water supply for staff quarters at Delhi includes those held jointly with

STC Limited earlier on 50:50 basis. However, during 2018-19, the company has obtained execution of separate lease deed for 16.16 acre land from DDA towards its share.

(b) During the year, the company assessed the impairment loss of assets and accordingly provision towards impairment in the value of PPE amounting to 'Nil (P.Y. Nil)' has been made during the year.

© The original title papers of the 36 properties of MMTC valuing ₹ 1515.96 crores (as per valuation report 2021) are deposited with Registrar General, Hon'ble Delhi High Court based on directions passed by it vide order dated 22.04.2019 and 22.05.2019.



4. Investment Property

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Gross carrying value as at beginning of the year	4.88	4.88
Additions	-	-
Disposal/adjustments	-	-
Gross carrying value as at end of the year	4.88	4.88
Accumulated depreciation as at beginning of the year	1.01	0.84
Additions	0.16	0.16
Accumulated depreciation as at end of the year	1.18	1.01
Net Carrying Value as at end of the year	3.70	3.87

(₹ in crores)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Rental income	1.91	1.50
Direct operating expenses from property that generated rental income	-	-
Direct operating expenses from property that did not generate rental income	-	-
Profit from investment properties before depreciation	1.91	1.50
Depreciation	0.08	0.08
Profit from investment properties	1.83	1.42

Leasing arrangements

Certain investment properties are leased to tenants under long-term operating leases with rentals payable monthly. Minimum lease payments receivable under non-cancellable operating leases of investment properties are as follows :

(₹ in crores)

Particulars	March 31, 2022	March 31, 2021
Within one year	1.81	-
Later than one year but not later than five year	2.50	-
Later than five year	2.15	-
Total	6.46	-

Estimation of fair value

The investment properties have been measured following cost model. The fair values of investment properties determined by independent valuer is ₹ 110.15 crore (P.Y. ₹ 107.63 crore)

5. Intangible Assets

(₹ in crore)

Particulars	Gross carrying value as at April 1, 2021	Additions	Disposal/adjustments	Gross carrying value as at March 31, 2022	Accumulated depreciation as at April 1, 2021	Additions	Disposal/adjustments	Accumulated depreciation as at March 31, 2022	Net Carrying Value as at March 31, 2022	Net Carrying Value as at March 31, 2021
Computer Softwares	4.23	-	-	4.23	3.84	0.16	-	4.00	0.23	0.39
Last Year	4.11	0.13	-	4.24	3.55	0.30	-	3.85	0.39	

6. Investments

(₹ in crores)

Particulars	As at March 31, 2022		As at March 31, 2021	
NON CURRENT INVESTMENTS				
A) Investments in Equity Instruments - (Investments accounted for using the equity method - Unquoted Joint Ventures)				
Free Trade Warehousing Pvt. Ltd. 5000 (P.Y. 5000) fully paid up equity shares of Rs.10 each.	0.00		0.01	
Add/(Less) : Income/(Loss) from Joint Venture till date	0.00	-	- 0.01	-
MMTC Pamp India Pvt. Limited. 17446000 (P.Y. 17446000) fully paid up equity shares of Rs. 10 each.	17.45		17.45	
Add : Income from Joint Venture till date	73.97	91.42	62.42	79.87
Total (A)		91.42		79.87
B) Investments in Equity Instruments - (Others)				
a) At Fair Value through other comprehensive income Quoted				
Bombay Stock Exchange Limited. 116883 (P.Y. 38961) fully paid up equity shares of Rs.2 each.*	3.00		3.00	
Add /(Less): Fair Value Adjustment through Other Comprehensive Income	8.03	11.03	(0.77)	2.23
b) At amortized cost Unquoted				
Indo French Biotech Limited. 4750000 (P.Y. 4750000) fully paid up equity shares of Rs. 10 each.	4.75		4.75	
Less : Impairment in value of investment	(4.75)	0.00	(4.75)	0.00
Total (B)		11.03		2.23

* During the year Bombay Stock Exchange (BSE) issued Bonus Share in the ratio 2:1, accordingly number of shares increased to 116883 (P.Y. 38961)

(₹ in crores)

Particulars	As at March 31, 2022		As at March 31, 2021	
Total Non-Current Investments (Gross)		25.20		25.21
	Aggregate Amount	Market Value	Aggregate Amount	Market Value
Aggregate amount of quoted investments and market value there of	3.00	11.03	3.00	2.23
Aggregate amount of unquoted investments	22.20	-	22.21	-
Aggregate amount of impairment in the value of investments	4.75	-	4.75	-



Particulars	As at March 31, 2022		As at March 31, 2021	
C. CURRENT INVESTMENTS	-	-	-	-

Particulars	As at March 31, 2022		As at March 31, 2021	
6 D. NON-CURRENT INVESTMENTS HELD FOR SALE				
a) Investments in Equity Instruments at amortized cost				
Joint Ventures				
Unquoted				
Neelachal Ispat Nigam Limited. 368762744 (P.Y. 368762744) fully paid up equity shares of 10 each.	459.11	-	459.11	-
Add/(Less) : Income/(Loss) from Joint Venture till date	(459.11)	-	(459.11)	-
Sical Iron Ore Terminal Limited. 33800000 (P.Y. 33800000) fully paid up equity shares of Rs. 10 each.	-	-	-	-
Add/(Less) : Income/(Loss) from Joint Venture till date	-	-	-	-
Others				
Fair value through other comprehensive income				
Unquoted				
Indian Commodity Exchange Limited. 32000000 (P.Y. 32000000) fully paid up equity shares of Rs. 5 each.	16.00	-	16.00	-
Add /(Less): Fair Value Adjustment through Other Comprehensive Income	(16.00)	-	(8.16)	7.84
Total Investments held for sale		0.00		7.84
b) PPE HELD FOR SALE		-		-
TOTAL (a)+(b)		0.00		7.84

- i. All Non-Current Investments in Equity Instruments of Subsidiaries and Joint Ventures are carried at cost less impairment in value of investment, if any. The Investment in Equity Instruments of others are carried at Fair Value.
- ii. The Company had invested ₹ 33.80 crore (P.Y ₹ 33.80 crore) towards 26% equity in SICAL Iron Ore Terminal Limited (SIOTL), a Joint Venture for the construction and operation of iron ore terminal at Kamrajar Port. The construction of terminal was completed by November 2010, the same could not be commissioned due to restrictions on mining, transportation and export of iron ore. After due tender process, Kamrajar Port Ltd (KPL) has allowed to SIOTL for necessary modifications to also handle common user coal. MMTC's Board of Directors during its 428th meeting held on 14.09.16 approved MMTC's exit through open tender mechanism from the JV. Accordingly, bids were invited from interested bidders for sale of MMTC's equity. No bids were received in the tender process. However, the lead promoter (i.e. M/s Sical Logistics Ltd) has agreed to buy MMTC's equity at the reserve price of ₹ 34.26 crore. Accordingly, the Share Purchase Agreement (SPA) has been signed and in terms of the agreement M/s SICAL Logistics Ltd have deposited ₹ 0.50 crore with MMTC towards performance of the Agreement. As per terms of SPA, M/s SIOTL applied to M/s Kamrajar Port Ltd for NOC/Permission of MMTC's exit from the JV. The NOC was received in Oct 2019. However, balance payment has not been received so far. Keeping in view the delay in receipt of share purchase value from M/s SICAL Logistics Ltd and financial distress of M/s Sical Logistics Ltd, a provision has been created for ₹ 33.80 crore towards impairment in value of investment on SIOTL. Accordingly the investment has been shown as 'held for sale'.

KPL issued notice of intent to terminate to SIOTL on 21.12.2020. The company file a writ petition on 24.06.2021 in Madras High Court against the termination notice issued by KPL. Vide order dated 30.11.2021, this petition has been dismissed by the Hon'ble Madras High Court on the ground that writ is not maintainable before the court. MMTC has filed an appeal before Hon'ble Madras High Court challenging the impugned judgement order dated 30.11.2021. Possibility of taking this matter to AMRCD and other options available for realisation of investment amount, is being explored. In the meantime, M/s Sical Logistics Limited holding company of SIOTL was undergoing Corporate Insolvency Resolution Process (CIRP). The Company (MMTC) lodged its claim of ₹ 34.26 Cr with CIRP of Sical Logistics. To safeguard the investment in SIOTL, M/s SICAL Logistics had moved a similar application being IA/574/Che/2021 in main CIRP proceedings being IBA/73/2020. To ensure that no adverse order is passed in these proceedings, MMTC filed an application being IA/686/Che/2021 for being impleaded as a party and to be heard before any order is passed. Vide order dated 11.03.2022, NCLT Chennai dismissed SICAL's IA/574/Che/2021 for want of Jurisdiction. Accordingly, MMTC's application being IA/686/Che/2021 in IA/574/Che/2021 stands closed. M/s SIOTL's two creditors (1. M/s Portman India Private Limited, Chennai 2. M/s ITD Cementation India Limited, Mumbai) initiated corporate insolvency resolution process against SIOTL in NCLT under Insolvency and Bankruptcy Code 2016. Vide order dated 01.03.2022, NCLT Chennai has admitted their applications and have appointed same IRP for both cases.
- iii. Government of India has accorded 'in principle' approval for divestment of 100 % equity of MMTC in NINL. The process of divestment is underway through DIPAM. Accordingly, the investment has been shown as investment 'held for sale'.

- iv. MMTC had invested ₹ 26 crore (5.20 crore equity share of ₹ 5 Face value) during 2009-10 in ICEX. ICEX Initial equity capital was ₹ 100 crore that was later on increased to ₹ 266.7537 crore. However later on MMTC divested 2 crore share @ ₹ 10 per share in 2015-16. After this divestment MMTC's shareholding reduced to ₹ 16 crore (3.20 crore share @ ₹ 5 Face value) which is 6% of the total share capital of ₹ 266.7537 crore. Later on due to erosion of Net worth of ICEX MMTC provided Fair value Adjustment of ₹ 8.16 crore and ₹ 7.84 crore in 2019-20 and 2021-22 respectively. After such adjustment share value in the books of accounts stands to ₹ nil as on 31.03.2022 (P.Y. ₹ 7.84 crore).

The equity shares of ICEX are not listed at any stock exchange in India as on 31.03.2022. MMTC has invited Request for Proposal (RFP) for divestment of 6% equity in ICEX and accordingly the investment has been shown as 'held for sale' as on 31.3.2022.

SEBI had granted the additional timeline till December 31, 2021 to comply with the shareholding limits as per SECC Regulations, 2018. MMTC has requested SEBI to extend the time for compliance of SECC Regulations, however, response is awaited. SEBI passed order dated 10.05.2022 for with drawl of recognition to Indian Commodity Exchange Ltd. and published in the official gazette of India on 18.05.2022. However, Securities Appellate Tribunal (SAT), by its order dated 13 June 2022 has Quashed SEBI order derecognizing ICEX.

- v. The company has fully impaired its equity investment of ₹ 2.99 crore in its joint venture- M/s MMTC Gitanjali Limited during the year 2017-18 in view of the recent defaults made by the main promoter, the investigations launched by the investigating agencies against them and considering the fact that JV Company has suspended its business activities. The company has also given notice for exiting from the JV Company. The financial statements have not been received from the JV Company for 2020-21, hence the same is also not considered for the purpose of consolidation.

7. Trade Receivable

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
(i) Trade Receivables from related parties		
a) Considered Good - Secured	-	-
b) Considered good - Unsecured	-	0.01
c) Which have significant increase in Credit Risk	-	-
d) Credit impaired	-	-
Less : Allowances for bad and doubtful debts	-	-
Sub-Total	-	0.01
(ii) Other Trade Receivables		
a) Considered Good - Secured	102.47	538.22
b) Considered good - Unsecured	299.17	295.88
c) Which have significant increase in Credit Risk	-	-
d) Credit impaired	390.12	390.02
Less : Allowances for bad and doubtful debts	390.12	390.02
Sub-Total	401.64	834.10
Total	401.64	834.11
NON-CURREN (A)	-	-
CURRENT (B)	401.65	834.11
TOTAL	401.65	834.11



Out of the above, amount due by directors or other officers of the company or any of them either severally or jointly with any other person or amounts due by firms or private companies respectively in which any director is a partner or a director or a member is ₹ Nil (P.Y. ₹ Nil).

Refer note no. 37.3 (b) for ageing.

Movement in allowances for doubtful debt

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Balance at the beginning of the year	390.02	388.97
Additions during the year	0.10	1.05
Reversals/ written off during the year	-	-
Utilisations during the year	-	-
Balance at the end of the year	390.12	390.02

8. Loans

(₹ in crores)

Particulars	As at March 31, 2022		As at March 31, 2021	
	CURRENT	NON-CURRENT	CURRENT	NON-CURRENT
Considered good - Secured				
Loans to Employees*	0.51	1.90	0.62	2.57
Others	-	-	-	-
Sub-Total	0.51	1.90	0.62	2.57
Considered good - Unsecured				
Loans to Employees	0.48	0.37	0.74	0.92
Others	-	-	-	-
Sub-Total	0.48	0.37	0.74	0.92
Credit impaired				
Others	0.03	0.14	0.03	0.14
Less: Allowance for bad and doubtful loans	0.03	0.14	0.03	0.14
Sub-Total	-	-	-	-
Total	0.99	2.27	1.36	3.49

Out of the above, amount due by directors or other officers of the company or any of them either severally or jointly with any other person or amounts due by firms or private companies respectively in which any director is a partner or a director or a member is ₹ Nil (P.Y. ₹ 0.01 crore).

*Secured by hypothecation/undertaking of property and other assets of employees.

9. Other Financial Assets

(₹ in crores)

Particulars	As at March 31, 2022		As at March 31, 2021	
	CURRENT	NON-CURRENT	CURRENT	NON-CURRENT
Bank Deposits with more than 12 months maturity	-	11.39	-	13.12
Balance with bank for Unpaid Dividend	-	0.19	-	0.22
Receivable From NSEL (i)	-	208.25	-	208.25
Demurrage and Despatch receivable	4.40	6.42	5.00	6.26
Forward contract receivable	-	-	-	-
Advances to other Companies (ii)	-	33.53	-	33.53
Other Advances	1.85	8.97	(0.05)	8.78
Security Deposit	4.00	2.34	20.82	2.36
Interest accrued due/not due on:	-	-	-	-
- Term Deposits	0.46	-	1.81	-
- Loans to Employees	0.58	6.20	0.55	7.10
- Loans to Related Parties	-	-	-	-
- Loans to Others	-	2.25	0.02	2.25
Others	-	9.92	-	9.90
Less: Impairment / Allowances for bad and Doubtful Receivables etc.	2.39	243.88	1.13	244.27
Total	8.90	45.58	27.02	47.50

- (i) Represents ₹ 208.25 crores (P.Y. ₹ 208.25 crores) recoverable from various borrowers and National Spot Exchange (NSEL) arising on account of default of payment obligation of NSEL against which full provision has already been made. The Company has filed legal suit in Bombay High Court against NSEL and others and hearings are in progress. CBI also investigated the case. The Hon'ble Supreme Court of India has set aside the order of amalgamation of NSEL with FTIL. Further, Hon'ble Supreme Court has allowed the appeal filed by State of Maharashtra and held that the notifications issued under Section 4 of the MPID Act attaching the properties of the 63 Moons Technologies Ltd are valid.

The suit filed by company has been tagged with the Suit No.121 of 2014 filed by L.J. Tanna Shares and Securities which has not come up for hearings as per the CMIS systems of the Hon'ble Bombay High Court in regular course. The next date of hearing is awaited.

- (ii) During the year a provision of ₹ Nil crore (P.Y. ₹ Nil crore) has been made against advance for project development to HFTWPL & KFTWPL. Total Provision as on 31.03.2022 is ₹ 16.30 crores (P.Y. ₹ 16.30 crores).

10. Deferred Tax Assets

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Deferred Tax Liability		
Property plant and equipment	(6.99)	(7.83)
Sub Total	(6.99)	(7.83)
Deferred tax Assets		
Prov. For Doubtful Debts	233.30	233.27
DWA Risk	-	0.02
VRS Expenses	-	3.03
Carried Forward Tax Losses*	-	330.69
Prov for Employee Benefit Expense	(11.90)	(3.74)
Sub Total	221.40	563.27
Deferred Tax Assets (Net)	214.41	555.44

Deferred Tax assets have been recognised to the extent of expected utilisation against probable future taxable income of the company.

* Deferred Tax Assets amounting to ₹ 330.69 crores was created during the previous year 2020-21 on losses limited to probable interest proceeds from FY 2019-20 to 2021-22 to be realised through divestment proceeds from NINL. Considering the certainty of realisation of interest proceeds from NINL for FY 2019-20 & 2020-21, the interest for FY 2019-20 & 2020-21 has been booked in current year on the basis of waterfall agreement signed and subsequent directives. Hence, Deferred Tax Assets of ₹ 330.69 Crores created earlier has been reversed.

Further, the Company has not recognised Deferred Tax Assets on carry forward losses arising during the Current as well as previous financial years on conservative basis keeping in view of the uncertainties involved.

Movement in deferred tax balances during the year

(₹ in crores)

Particulars	Balance As at March 31 2021	Recognised in Profit and Loss	Adjustments	Balance As at March 31 2022
Deferred Tax Liability				
Property plant and equipment	(7.83)	0.84	-	(6.99)
Sub Total	(7.83)	0.84	-	(6.99)
Deferred tax Assets				
Provisions for Bad & Doubtful Debts	233.27	0.03	-	233.30
Prov. for DWA Risk	0.02	(0.02)	-	-
VRS Expenses	3.03	(3.03)	-	-
Carried Forward Tax Losses	330.69	(330.69)	-	-
Prov for Employee Benefit Expense	(3.74)	(8.16)	-	(11.90)
Sub Total	563.27	(341.87)	-	221.40
Total	555.44	(341.03)	-	214.41

Recognised Deferred tax assets

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Deductible temporary difference	214.41	555.44
Total	214.41	555.44

Deferred tax assets and deferred tax liabilities have been offset as they relate to the same governing laws.



11. Other Assets

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
A. Non-Current		
Advances other than Capital Advances		
- Advances to other Suppliers	4.79	4.67
- Other Advances	17.03	17.12
Allowances for bad and Doubtful Advance	(18.27)	(18.02)
Others		
- Income Tax paid recoverable*	20.45	20.94
- Others	0.04	0.04
Total	24.04	24.75
B. Current		
Advances other than Capital Advances		
- Advances to Related Parties**	1,425.00	1,425.00
- Trade Related Advance to Related Parties**	2,038.11	2,103.47
- Interest accrued realisability uncertain	-	(547.87)
- Advances to other Suppliers	0.79	8.38
- Claim Recoverable Others	167.03	165.44
- Gold/Silver stock towards unbilled purchases	24.96	294.50
- Other Advances	15.30	15.41
Allowances for bad and Doubtful Advance	(3.36)	(3.36)
Others		
- Income Tax refund due	3.51	11.12
- Sales Tax refund due	14.50	13.77
- Excise/Custom duty refund due	4.68	4.68
- Service Tax refund due	0.53	0.40
- Others	18.48	55.18
Total	3,709.53	3,546.12

* Includes ₹14.68 crores (P.Y. 20.45 crores) is under dispute (refer note no. 34 (i) (b))

** Includes amount of ₹547.87 crores related to interest recoverable recognised on divestments of NIHL (refer note no. 36 (c)).

12. Inventories

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Raw Materials	5.09	5.83
Finished Goods	20.66	22.25
Stock in trade	3.65	13.83
(includes goods in transit valued at ₹ 2.68 crore (P.Y. ₹ 7.69 crore)		
Others	0.40	3.74
Total	29.80	45.65

- As taken, valued and certified by the management.
- Inventories including goods in transit are valued at lower of the cost or realizable value as on 31st March 2022. Valuation of closing stock at market price being lower than cost, has resulted in a loss of ₹ 0.01 crores (P.Y. ₹ 1.59 crores).
- Stock-in-trade includes the following:
 - 9036 units (P.Y. 9036 units) Certified Emission Reductions (CERs) valued at ₹ 1 (P.Y. ₹ 1) as per IndAS-2 'Inventories', being lower of cost or net realizable value.
 - Nil units (P.Y. Nil units) number of CERs under certification.
 - An amount of ₹ 5.30 crore (P.Y. ₹ 4.91 crore) has been spent on account of Depreciation, O&M cost of Emission Reduction equipment.
- Stock in Trade includes an inventory of ₹ Nil (P.Y. ₹ Nil) valued at cost relating to onion imported under Price Stabilization Scheme of the Government of India to create Buffer Stock of onion. (Refer note no. 36(e)).

13. Cash & Cash Equivalents

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Balances with Banks		
(a) in Current Account	115.84	62.93
(b) In term deposit with original maturity upto 3 months	15.57	57.92
(c) Debit balance in Cash Credit Account	20.96	33.99
Cheques/Drafts/Stamps on hand	-	-
Cash on hand	0.07	0.16
Total	152.44	155.00

14. Bank Balances other than above

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
As Margin money/under lien	48.66	88.66
In term deposit with original maturity more than 3 months but less than 12 months	0.79	9.99
Total	49.45	98.65

15. Current tax Assets (Net)

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Advance Tax Paid/TDS Recoverable for the FY 2021-22	3.61	-
Advance Tax Paid/TDS Recoverable for the FY 2020-21	-	2.64
Total	3.61	2.64

16. A. Equity Shares Capital

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Authorized		
Ordinary shares of par value of Rs. 1/- each		
Number	2,00,00,00,000	2,00,00,00,000
Amount	200.00	200.00
Issued, subscribed and fully paid		
Ordinary shares of par value of Rs. 1/- each		
Number	1,50,00,00,000	1,50,00,00,000
Amount	50.00	150.00

Reconciliation of number of shares:

Particulars	As at March 31, 2022	As at March 31, 2021
Opening Equity Shares	1,50,00,00,000	1,50,00,00,000
Add: No. of Shares issued/ subscribed during the year	-	-
Less: Deduction	-	-
Closing balance	1,50,00,00,000	1,50,00,00,000

No. of Shares in the company held by shareholder holding more than 5 percent

Name of the Shareholder	As at March 31, 2020	As at March 31, 2019
- President of India	1,34,89,03,143	1,34,89,03,143

Shareholding of Promoters

Shares held by promoters at the end of the year			%Change during the year
Promoter Name	No. of Shares	% of total shares	
- President of India	1,34,89,03,143	89.93%	Nil



The Company has one class of share capital, comprising ordinary shares of ₹ 1/- each. Subject to the Company's Articles of Association and applicable law, the Company's ordinary shares confer on the holder the right to receive notice of and vote at general meetings of the Company, the right to receive any surplus assets on a winding-up of the Company, and an entitlement to receive any dividend declared on ordinary shares.

Movements in equity share capital: During the year, the company has not bought back any shares.

The Company does not have any holding company.

During 2018-19, the company has allotted 50 crore equity shares in ratio of 1:2 as fully paid bonus shares by capitalization of free reserves amounting to ₹ 50 crore, pursuant to an ordinary resolution passed after taking consent of shareholders through postal ballot. Accordingly the paid up share capital of the company stands increased to ₹ 150/- crore divided into 150 crore equity share of ₹ 1/-each fully paid.

B. Other Equity

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
General Reserve	598.89	598.89
Research & Development Reserve	-	-
Retained Earnings	(919.58)	(657.20)
Bond Redemption Reserve	8.30	8.30
Other Reserves	14.30	(0.25)
Total	(298.09)	(50.26)

(i) General Reserve

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Opening Balance	598.89	598.89
Transfer from surplus/other reserves	-	-
Issue of Bonus Shares	-	-
Closing Balance	598.89	598.89

(ii) Research & Development Reserve

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Opening Balance	-	-
Transfer from surplus	-	-
Transfer to General Reserve	-	-
Closing Balance	-	-

(iii) Bond Redemption Reserve

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Opening Balance	8.30	8.30
Transfer from surplus	-	-
Deduction	-	-
Closing Balance	8.30	8.30

(iv) Retained Earnings

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Opening Balance	(657.20)	132.08
Net Profit for the year	(262.38)	(789.28)
Dividend and Dividend Distribution Tax	-	-
Other Adjustments	-	-
Appropriations :-		
General Reserve	-	-
Closing Balance	(919.58)	(657.20)

v. Other Reserves

(₹ in crore)

	Equity Components of compound financial instruments	Equity instruments through OCI	Effective Portion of cash flow hedges	Exchange differences on translating the financial statements of a foreign operation	Remeasurements - Post Employee Benefit Plans	Total other reserves
As at April 1 2020	1.13	(10.00)	-	16.93	(13.86)	(5.80)
Remeasurements of the defined benefit plans	-	-	-	-	7.27	7.27
Other adjustments	-	-	-	-	-	-
Equity Instruments through other comprehensive income	-	1.07	-	-	-	1.07
Addition / (Deduction)	-	-	-	(2.79)	-	(2.79)
As at April 1 2021	1.13	(8.93)	-	14.14	(6.59)	(0.25)
Remeasurements of the defined benefit plans	-	-	-	-	11.80	11.80
Other adjustments	-	-	-	-	-	-
Equity Instruments through other comprehensive income	-	0.97	-	-	-	0.97
Addition / (Deduction)	-	-	-	1.78	-	1.78
As at March 31, 2022	1.13	(7.96)	-	15.92	5.21	14.30

17. Borrowings

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
A. NON-CURRENT		
(i) Term Loans		
(a) From Banks		
- Secured	-	-
- Unsecured	-	-
Total	-	-
B. CURRENT		
(i) Loans repayable on Demand		
(a) From Banks		
- Secured (against hypothecation of inventories, trade receivables and other current assets present and future)	262.69	239.04
- Unsecured	2,358.96	2,178.81
Total	2,621.65	2,417.85

- The loans have not been guaranteed by any of the director or others.
- The loans have been taken from Banks under Cash Credit/Packing Credit Accounts/Others and are repayable within one year. Interest payable on loan repayable on demand is based on MCLR plus spread of banks.
- The quarterly returns or statements of current assets are filed by the company with banks on the basis of provisional monthly information system prepared for internal purposes.

As per loan restructuring agreements, the due date of loan and interest repayment was 30.03.2022 with a review period of 30 days. Total outstanding bank loan and interest was to be paid in one go on or before 29.04.2022 (30 days review period after 30.03.2022), mainly out of NINL divestment As bank loan along with interest could not be repaid on due date/ review period due to non-receipt of disinvestment proceeds of NINL, MMTC Account with all lender banks has been downgraded to \ Sub-standard/ NPA w.e.f. 08.06.2021 ie. the date of loan restructuring. Penal provisions are now applicable as per loan restructuring agreements and other legislations. SBI has put all accounts on hold. SBI vide their mail dated 27.04.2022 had already intimated that if payment is not made upto 29.04.2022, MMTC account will be downgraded to Non Performing Asset (NPA). In such a scenario, Bank's guidelines applicable for the NPA accounts will come into force, which includes but not limited to:

- Initiate remedial measures for recovery of the outstanding amount
- Concession extended, if any, shall be withdrawn and card rate shall be made applicable
- Reset interest rate to the Card Rate applicable

The communication in this regard has been sent to Stock Exchanges. A Joint Lender's Meeting was also held on 02.05.2022 and MMTC was allowed business transactions in respect of GMS e-auction. Statutory, utility and other essential payments were also allowed for survival and retaining the status as going concern. It was also mentioned in the minutes of the meeting that the downgrading of account is as per regulatory guidelines of RBI and penal interest/ card rate of respective banks would be applicable. Considering reasonable amount of certainty in realization of NINL disinvestment proceeds, lender banks did not intend to initiate any legal action/ other remedial measures for recovery process as of now. MMTC has been facing liquidity crisis for long time. MMTC bank limit were exhausted mainly up to 2019-20 including MMTC internal resources for providing working capital/loan to NINL etc. MMTC liabilities at present are frozen on 31.03.2021 as per DIPAM/IMG. As per directives of Board, MMTC requested all lender banks for restructuring of loan in terms of RBI Circular no. RBI/2020-21/16 DOR No.BP/BC/3/21.04.048/2020-21 dated 06.08.2020 for resolution of Covid-19 related stress. The loan resolution plan was



approved by all lender banks and was implemented w.e.f. 08.06.2021. Principal amount of loan outstanding as on the date of implementation of resolution plan was ₹ 2272.25 crore. Requisite information and / records were shared with banks and subsequently company and lender banks have signed Master Debt Resolution Agreement (MDRA), Trust and Retention Account Agreement (TRA) and other necessary documents thereto on 08.06.2021. DOC was kept informed about all developments/issues from time to time as required. Post implementation of loan restructuring, MMTC account remained regular/ standard with all the lender banks. By signing the documents, lenders waived existing event of default and no civil action or proceeding may be invoked under IBC. Under this scheme, the company has got moratorium/ deferment on recovery of interest for credit facilities upto 08.12.2021 for SBI and 31.03.2022 for other banks and for principal upto 31.03.2022 for all banks. MMTC continued to pay Karnataka Bank and started payment to SBI interest from Dec 21/ Jan 22. MMTC was not able to pay bank loans and interest on due date ie.30.03.2022 and further within the review period upto 29.04.2022, due to delay in receipt of NINL proceeds and substantial downsizing of business resulting in negligible trade income. As a consequence, MMTC account with all lender banks downgraded to substandard/NPA w.e.f.08.06.2021 ie. The date of loan restructuring. MMTC had made several requests in this regard to banks and also informed SEs/DOC/DFS/DIPAM. Efforts are being made to avoid adverse effects of NPA with requests / meetings with banks. The lender banks allowed statutory, utility and other essential payments and certain business transactions for survival of the company. Considering expected NINL disinvestment proceeds, lender banks did not intend to initiate any legal action/ other remedial measures for recovery process for the time being.

Consequent upon receipts of divestment proceeds from NINL on 4.7.2022 an amount of ₹ 2551.44 crore as on 31.3.2022 have been paid towards principal and normal agreed interest upto 31.3.2022. Further as on 6.7.2022 statement have been obtained and lenders have provided statement with penal interest form 1.4.2022 onwards only but company has paid only normal interest and taking of with lenders for waving of penal interest, processing fee, other extra charges for which company is hopeful of wavier and an amount of ₹ 50.30 crore paid on 6.7.2022 towards interest from 1.4.2022 till 6.7.2022 at normal rate.

18. Trade Payable

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
CURRENT		
Trade Payables		
Total outstanding dues of micro and small enterprise	0.18	0.03
Total outstanding dues of creditors other than micro and small enterprise	534.18	998.17
Trade Payables to Related Parties		
Total outstanding dues of micro and small enterprise	-	-
Total outstanding dues of creditors other than micro and small enterprise	0.02	0.11
Total	534.38	998.31

Refer note 37.3 (c) for ageing.

19 Lease Liabilities

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
A. NON-CURRENT		
Lease	4.14	3.61
Others	-	-
Total	4.14	3.61
B. CURRENT		
Lease	0.13	0.35
Total	0.13	0.35

19 C. Other Financial Liabilities

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
CURRENT		
Payables		
Total outstanding dues of micro and small enterprise	0.10	
Total outstanding dues of creditors other than micro and small enterprise	15.79	14.88
Despatch/ Demurrage payable	2.71	4.23
Amount recovered-pending remittance	12.12	8.72
Interest accrued on borrowings	2.16	2.08
Security Deposit & EMD	12.83	43.57
Unpaid Dividend	0.19	0.22
Claims payable	41.40	47.20
Others	132.07	88.40
Total	219.37	209.30

20. Provisions

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
A. NON-CURRENT EMPLOYEE BENEFITS		
a) Earned Leave	15.39	13.12
b) Compassionate Gratuity	0.07	0.09
c) Post Retirement Medical Benefit	-	
Retired/retiring on or after 01.01.2007	(1.02)	5.22
Retired before 01.01.2007	0.05	1.32
d) Half Pay Leave	16.60	16.29
e) Service Award	2.87	3.41
f) Employee's Family Benefit Scheme	2.37	3.11
g) Special benefit to MICA employees	1.07	1.47
Total	37.40	44.03
B. CURRENT EMPLOYEE BENEFITS		
a) Earned Leave	3.17	2.89
b) Compassionate Gratuity	0.03	0.03
c) Post Retirement Medical Benefit	-	
Retired/retiring on or after 01.01.2007	(1.18)	0.28
Retired before 01.01.2007	3.83	2.49
d) Half Pay Leave	3.55	4.30
e) Gratuity	0.15	8.41
f) Service Award	0.71	0.94
g) Bonus/performance related pay	3.50	17.84
h) Employee's Family Benefit Scheme	0.43	0.52
i) Special benefit to MICA employees	0.42	0.38
Sub Total	14.61	38.08
OTHERS		
Destinational weight and analysis risk	-	0.08
Provision for Litigation Settlements*	1,067.39	888.81
Sub Total	1,067.39	888.89
Total	1,082.00	926.97

*Includes amount of ₹ 1054.87 crores (P.Y. ₹ 877.43 crores) related to Anglo Coal litigation (refer note 32 (ii)) also this amount is subject to foreign exchange fluctuation.

21. Other Liabilities

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Current		
Advance Received from Customers	376.74	418.68
Statutory dues Payable	6.24	57.93
Amount payable towards unbilled purchases	24.96	294.50
Others	2.19	1.11
Total	410.13	772.22

22. Current tax liabilities (Net)

(₹ in crores)

Particulars	As at March 31, 2022	As at March 31, 2021
Income tax payable for the FY 2021-22	22.28	-
Income tax payable for the FY 2020-21	-	1.48
Total	22.28	1.48

23. Revenue From Operations

(₹ in crores)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Sale of Products	11,237.80	29,970.20
Sale of Services	4.50	2.91
Other Operating Revenue		
- Claims	0.15	25.90
- Subsidy	-	-
- Despatch Earned	1.43	11.25
- Other Trade Income	552.36	(8.79)
Total	11,796.24	30,001.47



24. Other Income

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Interest Income		
- From Fixed Deposits	3.19	5.38
- From Customers on amount overdue	-	0.15
- Others	1.51	3.32
Dividend Income		
- From Joint Ventures	-	-
- From Others	0.08	0.07
Other Non Operating Revenue (Net of expenses directly attributable to such income)		
- Staff Quarters Rent	0.71	0.70
- Liabilities Written Back	9.15	4.38
- Foreign Exchange Gain	-	-
- Misc. Receipt	3.09	3.67
Total	17.73	17.67

25. Cost of Materials Consumed

(₹ in crores)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Opening stock of Raw Material	5.83	11.31
Add : Transfer from purchases	106.66	70.30
Less : Closing Stock of Raw Material	5.09	6.10
Cost of Materials Consumed	107.40	75.51
Consumables	-	-

26. Purchase of Stock-in-Trade

(₹ in crores)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
A. Purchases		
Precious Metal	5,480.78	12,803.89
Metals	105.25	323.25
Fertilizers	1,449.64	9,162.36
Minerals	115.39	1,766.86
Agro Products	3,156.95	3,555.34
Coal and Hydrocarbons	207.81	709.93
General Trade	28.38	26.63
Others -	-	-
B. Stock Received/(Issued) in kind		
Precious Metals	(0.03)	(0.09)
Total	10,544.17	28,348.17

27. Changes in Inventory

(₹ in crores)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
A. Finished Goods		
Opening Balance	22.25	43.38
Closing Balance	20.67	22.58
Changes in Inventory of Finished Goods	1.58	20.80
B. Stock-In-Trade		
Opening Balance	13.83	155.83
Closing Balance	3.66	14.81
Changes in Inventory of Stock in Trade	10.17	141.02
Net (Increase) / Decrease	11.75	161.82

28. Employees' Benefit Expenses

(₹ in crores)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
a) Salaries and Wages		
Salaries and Allowances	91.88	105.55
Leave encashment	8.22	7.86
Bonus	0.29	0.41
Performance Related Pay	-	-
Medical Expenses	3.09	6.97
Group Insurance	0.07	0.08
VR Expenses	-	-
b) Contribution to Provident Fund & Other Funds		
Provident Fund	8.41	9.14
Gratuity Fund	2.03	4.03
Family Pension Scheme	0.73	0.84
Superannuation Benefit	4.08	4.59
c) Staff Welfare Expenses	0.52	0.74
Total	119.32	140.21

- (i) Profit of the company for PRP purpose has been calculated taking into account interest income on trade related advance (other than overdue) as per Accounting Policy no. 2.4 (ii). Pending approval of the Remuneration Committee as mandated in the DPE Guidelines, the PRP advance was made to employees. The order for recovery of above PRP advance from employees is disputed by staff & officers forum and is pending in respective courts.
- (ii) The payment of perks & allowances has been deferred w.e.f. 01.09.2020 in accordance with the decision of FMCOD in its meeting held on 20.10.2020 on the grounds of poor financial health of the company.
- (iii) It is notified vide order No. MMTC/CO/IRP/08/2018 dated 02.05.2018, that the rates of HRA shall be revised to 27%, 18%, 9% and 30%, 20%, 10% (for class X, Y & Z cities) if the IDA crosses 25% and 50% respectively in line with DPE guidelines. Since IDA was revised to 27.2% w.e.f. 01.10.2021, necessitating revision of HRA as mandated.
- (iv) CPF/Pension dues from December 2021 to March 2022 was pending and same has been paid on 5.7.2022.
- (v) MMTC Employees Post-Retirement Medical Benefit Trust, is still not operational. MMTC has been incurring losses and the provisions for loss years i.e., 2019-20 and 2020-21 has been reversed. The decision to fund the PRMBS Trust is under consideration, keeping in view the affordability provision laid down in the DPE order.

29. Finance Cost

(₹ in crores)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Interest Expenses	208.82	201.60
Interest Expenses on Lease	0.11	0.49
Premium on forward contract	-	-
Total	208.93	202.09

30. Depreciation And Amortization Expenses

(₹ in crores)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Depreciation on PPE	4.68	5.24
Depreciation on Investment Property	0.48	0.16
Amortization of Intangible Assets	0.15	0.29
Total	5.31	5.69



31. Other Expenses

(₹ in crores)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
a) Operating Expenses :		
Freight	61.55	87.32
Demurrage	(0.05)	0.85
Clearing, Handling, Discount & Other charges	70.35	126.71
L/C negotiation and other charges	3.23	3.77
Difference in foreign exchange	0.10	(7.72)
Customs duty	388.11	1,072.70
Packing Material	0.23	0.17
Insurance	-	-
Godown insurance	1.10	1.37
Plot and Godown rent	0.01	0.66
Provision for destinal weight and analysis risk	-	0.08
Sub Total (a)	524.63	1,285.91
b) Administrative Expenses :		
Rent	0.99	1.31
Security Expenses	2.78	3.41
Rates and taxes	1.90	1.46
Insurance	0.13	0.20
Repairs to buildings	3.37	4.51
Repairs to machinery	0.03	0.02
Repairs & Maintenance- Computers	1.50	1.89
Repairs & Maintenance - Others	0.34	0.36
Electricity & Water Charges	2.50	2.34
Advertisement & Publicity	0.05	0.10
Printing & Stationery	0.22	0.22
Postage & Courier	0.09	0.04
Telephone	0.79	0.82
Telecommunication	0.14	0.37
Travelling	0.39	0.70
Vehicle	0.56	0.90
Entertainment	0.13	0.12
Legal	2.95	4.07
Auditors' Remuneration	0.68	0.65
Bank Charges	15.79	0.60
Books & Periodicals	-	0.01
Trade / Sales Promotion	0.15	0.28
Subscription	0.12	0.21
Training, Seminar & Conference	-	0.01
Professional/Consultancy	1.48	1.47
CSR Expenditure	0.05	0.89
Difference in foreign exchange	4.32	(4.17)
Service Tax / GST	1.03	1.93
Exhibition and Fairs	0.11	0.08
Miscellaneous Expenses	4.17	4.04
Sub Total (b)	46.76	28.84
c) Others		
Allowance for Bad and Doubtful Debts / claims/ advances	1.05	1.06
Bad Debts/Claims/Assets written off/withdrawn	0.02	5.80
Sub Total (c)	1.07	6.86
Total (a+b+c)	572.46	1,321.61

32. Exceptional Items

(₹ in crores)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Write-down of inventories to net realisable value and its reversal	0.01	1.59
Disposals of items of fixed assets	(0.04)	(0.24)
Provision for dimunition in value of non current investment (I)	0.01	-
Profit on surrender of lease assets	-	(1.13)
Litigation settlements (ii)	178.44	877.25
Provisions no longer required (iii)	(23.22)	(0.29)
Total	155.20	877.18

- (i) Represents provision towards equity investment in Free Trade Warehousing Pvt. Ltd.
- (ii) A provision of ₹ 877.43 crore was made during in FY 2020-21 towards Anglo Coal Liability and further during the year 2021-22 a provision of ₹ 177.44 crore towards pre arbitration interest liability for the period 1.10.2009 to 24.9.2012 and exchange difference has been made as per Hon'ble Supreme Court order dated 29.07.2021. Further developments in respect of the legal case is under :
Thereafter in line with the opinion dated 27.03.2021 of Ld. AG, on disposal of Clarification application dated 19.04.2022, draft Curative Petition prepared by DMD Advocates sent to Ld. ASG for vetting and certification in consonance with direction of Board and DoC. Ld. ASG vetted the draft and the same was referred to Ld. AG through AOR for final settlement before filing. The Ld. AG vide letter dated 29.05.2022 now stated that this is not a fit case for Curative Petition. Copy of AG's letter was forwarded to DoC vide letter dated 08.06.2022. Thereafter the issue was formally taken up with Ld ASG that whether he is still willing for filing the curative petition by giving required certificate. Ld ASG has also declined MMTC curative petition at present.
- (iii) Includes ₹ 13.84 crore PRP provision of 2017-18 and 2018-19 withdrawn during the year as per the directives of BOD.

33. Tax Expense

(₹ in crores)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Current year	22.43	1.46
Adjustments relating to prior periods	-	0.07
Sub Total (A)	22.43	1.53
Deferred tax expense		
Origination and reversal of temporary differences	341.03	(324.60)
Sub Total (B)	341.03	(324.60)
Total (A+B)	363.46	(323.07)
Tax recognised in other comprehensive income		
Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Defined benefit plan actuarial gains (losses)	-	-
Total	-	-
Reconciliation of effective tax rates		
Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Profit before tax	101.08	(1,112.34)
Enacted tax Rate (applicable to holding company)	34.94	34.94
Computed Expected Tax Expense	-	-
Adjustments relating to holding company :		
Non-deductible expenses	-	-
Tax exempt income/ any other deduction or allowable exp.	-	-
Change in estimates related to prior years	-	-
Deferred Tax	-	-
Adjustments relating to Subsidiary & Joint Ventures	-	-
Tax Expenses for the year	-	-
Adjustment : Tax effect on OCI	-	-
Net Tax Expenses for the year	-	-



34. Contingent Liabilities & Disclosures:

i)

(₹ in crores)

Particulars	As at 31.03.2022	As at 31.03.2021
(I)		
a) Claims against the company not acknowledged as debts including foreign currency claim	287.17	175.57
b) Disputed Income Tax Demand against which ₹ 20.45 crore (P.Y. ₹ 19.64 crore) deposited	33.38	42.69
c) Disputed TDS demands	0.00	0.05
d) Disputed Sales Tax Demand against which ₹ 20.16 crore (P.Y. ₹ 12.36 crore) deposited and ₹ 0.07 crore (P.Y. ₹ 0.07 crore) covered by Bank Guarantees	217.30	202.73
e) Disputed Service Tax Demand	119.23	113.76
f) Disputed Central Excise demand against which ₹ 0.76 crore (P.Y. ₹ 0.76 crore) Deposited.	20.29	20.29
g) Disputed PF demand	2.66	2.24
h) Custom Bonds	317.98	254.80
i) Outstanding GR-1 against which Bank Guarantee furnished of ₹ 0.73 crore (P.Y. ₹ 0.73 crore)	1.60	1.60
j) Claims against the company not acknowledged as debts from a foreign supplier*	-	128.89
Total (I)	999.60	942.61
(II)		
Others on back to back basis where liability if any is to account of associate		
a) Differential Custom Duty/Interest/Penalty etc.	184.49	166.87
Total (II)	184.49	166.87

Movement in respect of items mentioned at S.No. (I)

(₹ In crores)

Particulars	Balance as at 31st March, 2021	Reduction during the year in respect of opening balance	Addition during the year 2021-22	Balance as at 31st March, 2022
a) Claims against the company not acknowledged as debts including foreign currency claim.	175.57	5.68	117.28	287.17
b) Disputed Income Tax Demand	42.69	9.32	-	33.38
c) Disputed TDS demands	0.05	0.05	-	0.00
d) Disputed Sales Tax Demand	202.73	3.80	18.38	217.30
e) Disputed Service Tax Demand	113.76	0.60	6.06	119.23
f) Disputed Central Excise demand	20.29	-	-	20.29
g) Disputed PF demand	2.24	-	0.42	2.66
h) Custom Bonds	254.80	38.97	102.16	317.98
i) Outstanding GR-1	1.60	-	-	1.60
j) Claims against the company not acknowledged as debts including foreign supplier.	128.89	128.89	-	-
Total	942.61	187.31	244.29	999.60

Share in Contingent Liabilities of Joint Ventures

(₹ in crores)

SI.No.	Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
1	MMTC PAMP India Pvt. Limited	7.71	7.70
2	SICAL Iron Ore Terminal Limited	NA	NA
3	Neelachal Ispat Nigam Limited	NA	610.58
4	Free Trade Ware- housing Pvt. Ltd.	NA	NA

NA–Audited Financial Statements not received

- ia) Guarantees issued by Banks on behalf of the Company ₹ 3.07 crores (P.Y. ₹ 3.66 crores) in favour of customer towards performance of contracts against which backup guarantees amounting to ₹ Nil (P.Y. Nil) have been obtained from associate suppliers.
- ii) Letters of Credit opened by the Company remaining outstanding ₹ 183.24 crores (P.Y. ₹ 138.38 crores).
- iii) Corporate Guarantees of ₹ 1345.82 crores (P.Y. ₹ 1345.82 crores) given by the company in favour of financial institutions/banks on behalf of Neelachal Ispat Nigam Limited (NINL), a Joint Venture Company, for securing principal and interest in respect of loans to NINL. (Refer note no. 36 c (iv))
- iv) In some of the cases, amounts included under contingent liabilities relate to commodities handled on Govt. of India's account and hence the same would be recoverable from the Govt. of India.
- v) Additional liability, if any, on account of sales tax demands on completion of assessments, disputed claims of some employees, non-deduction of Provident Fund by Handling Agents/Contractors, disputed rent and interest/penalty/legal costs etc., in respect of amounts indicated as contingent liabilities being indeterminable, not considered.
- vi) Claims against the company not acknowledged as debt includes demand raised by RPF of ₹ 0.69 crores on account of MMTC Employees Cooperative Canteen Society.
- vii) a) Above includes amount of ₹ 0.07 crore on account of demand raised by Stock Exchange Board of India (SEBI) in relation to non-compliance of regulation 33 of SEBI.

35. Commitments

Capital Commitments: Estimated amount of contracts including foreign currency contracts net of advances remaining to be executed on capital account and not provided for is ₹ Nil (P.Y. ₹ Nil crore).

Capital commitment in respect of investment in joint venture ₹ Nil (P.Y. ₹ Nil).

Share in Capital Commitments of Joint Ventures:-

SI.No.	Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
1	MMTC PAMP India Pvt. Limited	1.36	7.37
2	SICAL Iron Ore Terminal Limited	NA	NA
3	Neelachal Ispat Nigam Limited	NA	59.13
4	Free Trade Ware- housing Pvt. Ltd.	NA	NA

NA–Audited Financial Statements not received

36. General Disclosures :-

- a) Following goods on account of un-billed purchases are held by the Company under deposit and shown under other current assets (note no. 11 (B)) as well as other current liabilities (note no.21).

Items	31.03.2022		30.03.2021	
	Qty	Value	Qty	Value
Gold (in Kgs)	53.00	24.96	733.96	291.11
Gold Jewellery (in Grams)	-	-	-	-
Silver (in Kgs)	-	-	600.00	3.39
TOTAL	53.00	24.96	1,333.96	294.50

- b) NIL kgs (P.Y. 3956.494 kgs) of un-refined Silver is lying is DRO as on 31.3.2022 on behalf of Shri Mata Vaishno Devi Shrine Board. The value of the stock cannot be ascertained as fineness of the Silver is not known.

- c) Investment in and advances to Neelachal Ispat Nigam Ltd (NINL)-Joint Venture company :-

- (i) The company alongwith Government of Odisha has set up a 1.1 MT integrated steel plant in Odisha and invested ₹ 459.11 crore (P.Y. ₹ 459.11 crore) (Note 6) towards 49.78% in equity capital in NINL. The Government of India (CCEA) has accorded 'in principle' approval on 8th January, 2020 for strategic divestment of equity investment held by MMTC and other Central/State PSUs. The process of divestment is underway through Department of Investment and Public Asset Management (DIPAM). As per the Final financial Bid for divestment of NINL, DIPAM had declared M/s Tata Steel Long Products as the H1 bidder for enterprise value of ₹ 12,100.00 crore.
- (ii) The company has been extending, from time to time, short term credit facility (cash credit) to NINL upto a limit of ₹ 1,425.00 crore for its day to day operational activities on continuing basis. In addition, a trade related financial facility to the extent of ₹ 2,038.10 crore has also been extended. Against this, outstanding under Other Assets (advances to related parties) (note 11) is ₹ 3,463.11 crore (P.Y. ₹ 3,528.47 crore). Further as per the provision of waterfall agreement signed for distribution of divestment proceeds pursuant to divestment process initiated and managed by DIPAM, seller/ promoters liabilities on NINL has been frozen upto 31.03.2021.
- (iii) Reconciliation of accounts with NINL duly signed by MMTC & NINL has been done upto 31.03.2022 with outstanding balance of ₹ 3,463.11 crores. NINL's confirmation of balance of ₹ 3,463.11 crores as on 31.3.2022 has been obtained. This does not include Interest for the year 2021-22.



- (iv) The company has also given corporate guarantees amounting to ₹ 1,345.82 crores (P.Y. ₹ 1345.82 crores) in favour of FIs/Banks/others to secure the loans availed by NINL (note 34 (iii)). Since NINL is unable to service the interest of lenders, some of the lenders and bond holders have invoked the corporate guarantees, which are being addressed by NINL/MMTC separately. NINL is showing ₹ 1,295.82 crores in its books against corporate guarantees given by MMTC. NINL has paid all bankers/FIIs/ Bond Holders in July 22 and accordingly MMTC has written to all Bankers/ FIIs / Bond Holders to treat MMTC Corporate Guarantee (CG) as Null and Void and to return the original guarantee at the earliest.
- (v) The company has been recognising trade related interest during earlier years on accrual basis and is included in the outstanding advances. However, during 2019-20 & 2020-21 interest of ₹ 252.18 crores & ₹ 295.69 crores respectively was not recognised in the respective years which has been recognised during the year. Further as per the provision of waterfall agreement signed for distribution of divestment proceeds signed pursuant to divestment process initiated and managed by DIPAM, seller/ promoters liabilities on NINL has been frozen upto 31.03.2021. Interest for the year 2019-20 and 2020-21 has been recognised as other trade income during the current year however interest for the year 2021-22 has not been recognised. Deferred tax asset created during 2020-21 has been reversed in the current year.
- (vi) NINL have given corporate guarantee of ₹ 2,800.00 crores (P.Y. ₹ 2,800.00 crores) to the company to secure credit facilities extended to them from time to time. After divestment NINL and receipt of funds by MMTC, NINL Corporate Guarantee (CG) is no more valid.
- (vii) NINL has been incurring losses for last 10 years and its net worth has become negative ₹ (-) 3,487.41 crores as on 31.03.2021 (P.Y. ₹ (-) 2,564.71 crores as on 31.3.2020). Audited financial statements of NINL as on 31.3.2022 are not available as NINL is yet to finalise its audited accounts for the year 2021-22.
- (viii) The final bid of ₹ 12,100 crores received from Tata Steel Long Product (TSLP) against NINL divestment. NINL disinvestment completed on 04.07.2022 and MMTC receipts are:-
Amount towards operational & financial debt - ₹ 3,463.11 crores
Amount towards sale consideration - ₹ 1,872.34 crores
(Net of withholding tax against Investment of ₹ 459.10 crores)
Total Receipt by MMTC - ₹ 5,335.45 crores
- (ix) Over the above, an amount of ₹ 911.16 crores towards contingent liabilities on account of Govt. dues (₹ 36.77 crores – Non Tax liabilities & ₹ 874.39 crores – Tax liabilities) have been provided for in an interest bearing Escrow Account which shall be passed on to Sellers in the ratio of their stake holding, if the liabilities are not crystallised by the end of retention period (2 years for non – tax liabilities and 3 years for tax liabilities).
- (x) Out of realisation of Rs. 5,335.45 crores, the estimated liabilities towards bank loan, Anglo Coal, dues to employees including VRS/ VSS and others liabilities may be in the range of Rs. 5,200 crores to 5,300 crores estimated in July 2022. This will be subject to actual settlement of liabilities/audit/reconciliation and direction from Ministry/ competent authority. This does not include contingent liabilities.
- d) The Company has filed a recovery suit of ₹ 31.40 crores against M/s AIPL in respect of Mint sale transaction (P.Y. ₹ 31.40 crores) which included overdue interest of ₹ 2.95 crores (P.Y. ₹ 2.95 crores) which has been decreed in favour of the Company. M/s AIPL have also filed a suit against Government Mint/MMTC for damages of ₹ 167.20 crores (P.Y. ₹ 167.20 crores) which is not tenable as per legal opinion and is being contested.
- e) Under Price Stabilization Scheme of the Government of India to create Buffer Stock of onion, MMTC imported onion from July 2019 onwards until 31.03.2020. As per the scheme MMTC's trading margin has been fixed at 1.5% on C&F cost at the time of sale and all expenses related to the import shall be to the account of Govt. The difference between the sale realisation and cost incurred including MMTC's margin has been shown as claim receivables from Govt. which will be adjusted with the advance received from Govt.
- f) A claim for ₹ 1.53 crores (P.Y. ₹ 1.53 crores) against an associate on account of damaged imported Polyester is pending for which a provision of ₹ 1.53 crores (P.Y. ₹ 1.53 crores) exists in the accounts after taking into account the EMD and other payables. The company has requested customs for abandonment which is pending for adjudication. A criminal & civil suit has been filed against the Associate.
- g) At RO Mumbai, during the year 2011-12, a foreign supplier has submitted forged shipping documents through banking channels to obtain payment of ₹ 4.13 crores (P.Y. ₹ 3.98 crores) without making delivery of the material (copper). However, the company has obtained an interim stay restraining the bank from making the payment under the letter of credit which was vacated and Indian bank had to make payment to the foreign bank. The matter is still pending in the court. The same supplier is also fraudulently holding on to the master bills of lading of another shipment of copper which would enable the Regional Office, Mumbai to take delivery and possession of goods valued at ₹ 8.60 crores (P.Y. ₹ 8.60 crores), already paid for and after adjustment of EMD & payables provision for the balance amount has been made during the year 2014-15.
- h) At RO Hyderabad, fake bills of lading covering two shipments of copper valued at ₹ 3.75 crores (P.Y. ₹ 3.75 crores) were received during 2011-12 through banking channels against which no material was received. The foreign supplier has been paid in full through letter of credit after the company received full payment from its Indian customer. The company has initiated legal action against the foreign supplier. The amount of ₹ 4.44 crores for this transaction received in full and final settlement from the local buyer which includes in Advance received from customer under other non-current liabilities.
- i) Hon'ble Delhi High Court has directed the Company to deposit ₹ 39.62 crores (P.Y. ₹ 39.62 crores) stated to be receivable by one of the Company's coal suppliers as per their books of accounts from MMTC in a case relating to execution of decree filed by a foreign party against the coal supplier. MMTC has filed application and counter affidavit stating that the supplier's contractual obligations are yet to be discharged and MMTC is unable to deposit any amount at this stage. Any amount found payable to the supplier after resolution of all issues, the same will be deposited with the court instead of releasing to the supplier without any liability on MMTC. The hearings are in progress and next date of hearing 22.7.2022.

- j) FCI in March 2019 approached MOC&A,F&PD for initiation of Administrative Mechanism for Resolution of CPSEs Disputes (AMRCD) proceedings against MMTC for an amount of ₹ 92.18 crores, including interest as MMTC had deducted an amount of ₹ 60.99 crores from FCI's payment in May 2014. MMTC explained its position that an amount of ₹ 60.99 crores was deducted from wheat exports in 2014 to recover MMTC's dues from FCI arising from multiple transactions since 1991 onwards. The matter was admitted for resolution under AMRCD. The AMRCD committee in its meeting held on 22 May 2020 directed both MMTC and FCI to reconcile the accounts. MMTC and FCI have since begun working towards reconciliation of the claims and counter claims. Numerous rounds of discussions have taken place between MMTC and FCI, wherein the supporting documents have been exchanged between both the parties to establish their claims and counter claims, respectively. Once a consensus is reached, subsequently a report will be presented to AMRCD for its final decision and order.
- k) There are several provision for doubtful recoverable amounting to ₹ 1.13 crores, the recoverability assessment of these balances could not be performed due to non-availability of sufficient information. The company has initiated an internal note to prepare a guideline to assess the recoverability of such balances.
- l) There was an outstanding liability of TDS amounting ₹ 2.36 crores for the month of March of March, 2022 which was payable on or before 30.04.2022. MMTC liquidity position is very weak and salaries/dues/expenses are in arrears accordingly due to paucity of funds. There was delay in deposit of TDS and the same was remitted on 19.05.2022 to the department along with interest of ₹ 0.097 crores.
- m) The Board of Directors has in principle approved for closure of Regional Offices (RO) and Sub Regional Offices (SRO) Accordingly suitable order has been issued on dated 22.06.2022 and tentative VRS consent has been opened subject to necessary approval.

37. Financial Instruments - Fair Values and Risk Management

37.1 Financial Instruments by Categories

The following tables show the carrying amounts and fair values of financial assets and financial liabilities by categories. It does not include fair value information for financial assets and financial liabilities not measured at fair value if the carrying amount is a reasonable approximation of fair value.

(₹ in crores as at March 31, 2022)

Particulars	Amortized cost	Financial assets/liabilities at fair value through profit or loss	Financial assets/liabilities at fair value through OCI	Total carrying value	Total fair value
Assets:	-	-	-	-	-
Investments in Equity Instruments (Ref Note No.6)	-	11.03	-	11.03	11.03
Cash & Cash Equivalent (Ref Note No. 13)	152.44	-	-	152.44	-
Trade Receivable (Ref Note No. 7)	401.65	-	-	401.65	-
Employee Loans (Ref Note No. 8)	3.26	-	-	3.26	-
Loans to related party (Ref Note No. 8)	0.00	-	-	0.00	-
Security Deposits & Other Loans (Ref Note No. 8)	0.00	-	-	0.00	-
Security Deposits (Ref Note No. 11)	0.00	-	-	0.00	-
Other Financial Assets (Ref Note No. 9)	8.90	-	-	8.90	-
Liabilities:	-	-	-	-	-
Trade Payable (Ref Note No. 18)	534.38	-	-	534.38	-
Borrowings (Ref Note No.17)	2621.65	-	-	2621.65	-
Other Financial Liabilities (Ref Note No. 19)	0.13	-	-	0.13	-



(₹ in crores as at March 31, 2021)

Particulars	Amortized cost	Financial assets/liabilities at fair value through profit or loss	Financial assets/liabilities at fair value through OCI	Total carrying value	Total fair value
Assets:	-	-	-	-	-
Investments in Equity Instruments (Ref Note No.6)	-	-	2.23	2.23	2.23
Cash & Cash Equivalents (Ref Note No. 13)	155.00	-	-	155.00	-
Trade Receivable (Ref Note No. 7)	834.11	-	-	834.11	-
Employee Loans (Ref Note No. 8)	4.85	-	-	4.85	-
Loans to related party (Ref Note No. 8)	0.00	-	-	0.00	-
Security Deposits & Other Loans (Ref Note No. 8)	1.95	-	-	1.95	-
Security Deposits (Ref Note No. 11)	21.06	-	-	21.06	-
Other Financial Assets (Ref Note No. 9)	6.20	-	-	6.20	-
Liabilities:	-	-	-	-	-
Trade Payable (Ref Note No. 18)	998.31	-	-	998.31	-
Borrowings (Ref Note No.17)	2417.85	-	-	417.85	-
Other Financial Liabilities (Ref Note No. 19)	209.65	-	-	209.65	-

37.2 Fair Value Hierarchy

- Level 1 - Level 1 hierarchy includes financial instruments measured using quoted prices (unadjusted) in active markets.
- Level 2 - Level 2 hierarchy includes financial instruments measured using inputs other than quoted prices included within Level 1 that are observable for the asset or liability, either directly (i.e. as prices) or indirectly (i.e. derived from prices).
- Level 3 - Level 3 hierarchy includes financial instruments measured using inputs that are not based on observable market data (unobservable inputs).

The following tables present fair value hierarchy of assets and liabilities measured at fair value:

(₹ in crore as at March 31, 2022)

Particulars	Level 1	Level 2	Level 3	Total	Valuation Technique and key inputs	Significant unobservable inputs
Financial Assets	-	-	-	-	-	-
<i>Financial Investments at FVTOCI</i>	-	-	-	-	-	-
Investment in Equity Instruments (BSE)	11.03	-	-	11.03	-	Quoted Price
Investment in Equity Instruments (ICEX)	-	-	-	-	Book Value adopted as best estimate of Fair Value	-
Total	11.03	-	0.00	11.03	-	-

(₹ in crore as at March 31, 2021)

Particulars	Level 1	Level 2	Level 3	Total	Valuation Technique and key inputs	Significant unobservable inputs
Financial Assets	-	-	-	-	-	-
<i>Financial Investments at FVTOCI</i>	-	-	-	-	-	-
Investment in Equity Instruments (BSE)	2.23	-	-	2.23	-	Quoted Price
Investment in Equity Instruments (ICEX)	-	-	7.84	7.84	Cost adopted as best estimate of Fair Value	-
Total	2.23	-	7.84	10.07	-	-

37.3 Financial risk management, objectives and policies

The company's activities expose it to the following financial risks:

- market risk
- credit risk and
- liquidity risk

The company has not arranged funds that have any interest rate risk

a) Market risk

(i) Foreign Exchange Risk

The company has import and export transactions and hence has foreign exchange risk primarily with respect to the US\$. The company has not arranged funds through long term borrowings. The short term foreign currency loans (buyer's credit) availed from banks are fixed interest rate borrowings. As a result, the company does not have any interest rate risk. The company's risk management policy is to use hedging instruments to hedge the risk of foreign exchange.

The company uses foreign exchange forward contracts to hedge its exposure in foreign currency risk. The company designates the spot element of forward contracts with reference to relevant spot market exchange rate. The difference between the contracted forward and the spot market exchange rate is treated as the forward element. The changes in the spot exchange rate of hedging instrument that relate to the hedged item is deferred in the cash flow hedge reserve and recognized against the related hedged transaction when it occurs. The forward element of forward exchange contract is deferred in cost of hedging reserve and is recognized to the extent of change in forward element when the transaction occurs.

The following tables show the summary of quantitative data about the company's exposure to foreign currency risk from financial instruments expressed in ₹:

(₹ in crore as at March 31, 2022)

Particulars	US Dollars (in Equiv INR)	Other Currencies (in Equiv INR)	Total
Cash & cash equivalents	145.18	-	145.18
Trade Receivable	547.41	-	547.41
Demurrage / Despatch Receivable	4.61	1.65	6.26
Other Receivable	1.06	-	1.06
Total Receivable in foreign currency	698.26	1.65	699.91
Foreign Currency Loan payable	70.21	-	70.21
Interest on foreign currency loan payable	-	-	-
Trade Payables	280.30	0.55	280.85
Freight Demurrage / Despatch Payable	1.15	-	1.15
Provision towards Litigation Settlement	98.05	-	98.05
Others	904.19	-	904.19
Total Payable in Foreign Currency	1,353.90	0.55	1,354.45

The company has no exposure in respect of foreign currency receivable/payable since loss/gain is to the account of the Associate supplier/customer except on provision towards litigation settlement where matter is still under dispute. Also the company has taken forward exchange contracts in respect of payables at the risk and cost of the associate.



(₹ in crore as at March 31, 2021)

Particulars	US Dollars (in Equiv INR)	Other Currencies (in Equiv INR)	Total
Cash & cash equivalents	91.84	-	91.84
Trade Receivable	559.28	-	559.28
Demurrage / Despatch Receivable	4.61	1.65	6.26
Other Receivable	1.37	-	1.37
Total Receivable in foreign currency	657.10	1.65	658.75
Foreign Currency Loan payable	53.84	-	53.84
Interest on foreign currency loan payable	-	-	-
Trade Payables	249.79	0.55	250.34
Freight Demurrage / Despatch Payable	1.42	-	1.42
Provision towards Litigation Settlement	98.05	-	98.05
Others	904.66	-	904.66
Total Payable in Foreign Currency	1,307.77	0.55	1,308.31

The company has no exposure in respect of foreign currency receivable/payable since loss/gain is to the account of the Associate supplier/customer except on provision towards litigation settlement where matter is still under dispute. Also the company has taken forward exchange contracts in respect of payables at the risk and cost of the associate.

Sensitivity:

As of March 31, 2022 and March 31, 2021, every 1% increase or decrease of the respective foreign currencies compared to our functional currency would impact our profit before tax by approximately ₹ NIL and ₹ NIL, respectively.

(i) Price Risk

The company's exposure to equity securities price risk arises from investments held by the company and classified in balance sheet as at fair value through other comprehensive income. Out of the two securities held by the company, one is listed in NSE and the other (ICEX) is not listed.

As of March 31, 2022 and March 31, 2021, every 1% increase or decrease of the respective equity prices would impact other component of equity by approximately ₹ 0.02 crores and ₹ 0.01 crores, respectively. It has no impact on profit or loss.

b) Credit Risk

Credit risk refers to the risk of default on its obligation by a counterparty resulting in a financial loss. The maximum exposure to the credit risk at the reporting date is primarily from trade receivables. Accordingly, credit risk from trade receivables has been separately evaluated from all other financial assets in the following paragraphs.

Trade Receivables

The company's outstanding trade receivables are mostly secured through letter of credit/BG except in respect of JV's and Govt of India.

Impairment on trade receivables is recognized based on expected credit loss in accordance with provisions of Ind AS 109. The company's historical experience for customers, present economic condition and present performance of the customers, future outlook for the industry etc. are taken into account for the purposes of expected credit loss.

Credit risk exposure

An analysis of age of trade receivables at each reporting date is summarized as follows:

(₹ in crore as at March 31, 2022)

Particulars	Outstanding for following periods from due date of payment					Total
	Less than 6 months	6 months - 1 year	1-2 years	2-3 years	More than 3 years	
(i) Undisputed Trade receivables – considered good	273.88	2.88	5.15	3.17	116.39	401.47
(ii) Undisputed Trade Receivables – which have significant increase in credit risk	-	-	-	-	-	-
(iii) Undisputed Trade Receivables – credit impaired	-	-	-	0.00	7.73	7.73
(iv) Disputed Trade Receivables – considered good	-	-	-	-	0.18	0.18
(v) Disputed Trade Receivables – which have significant increase in credit risk	-	-	-	-	-	-
(vi) Disputed Trade Receivables – credit impaired	-	-	-	-	382.38	382.38
Sub Total	273.88	2.88	5.15	3.17	506.69	791.77
Less: Allowance for Credit Impairment					-	390.12
TOTAL						401.65

(₹ in crore as at March 31, 2021)

Particulars	Outstanding for following periods from due date of payment					
	Less than 6 months	6 months - 1 year	1-2 years	2-3 years	More than 3 years	Total
(i) Undisputed Trade receivables – considered good	424.69	2.21	0.02	3.11	403.90	833.93
(ii) Undisputed Trade Receivables – which have significant increase in credit risk	-	-	-	-	-	-
(iii) Undisputed Trade Receivables – credit impaired	-	-	0.00	-	7.74	7.74
(iv) Disputed Trade Receivables–considered good	-	-	-	-	0.18	0.18
(v) Disputed Trade Receivables – which have significant increase in credit risk	-	-	-	-	-	-
(vi) Disputed Trade Receivables – credit impaired	0	0	-	-	382.28	382.28
Sub Total	412.82	2.21	0.02	3.11	794.11	1224.13
Less: Allowance for Credit Impairment					0	390.02
TOTAL						834.11

Trade receivables are generally considered credit impaired when overdue for more than three years (except government dues), unless the amount is considered receivable, when recoverability is considered doubtful based on the recovery analysis performed by the company for individual trade receivables. The company considers that all the above financial assets that are not impaired though overdue are of good credit quality.

With regard to certain trade receivables, the company has equivalent trade payables to associate suppliers which are payable on realization of trade receivables. Such trade receivables are considered not impaired though past due.

Other financial assets

Credit risk relating to cash and cash equivalents is considered negligible because our counterparties are banks. We consider the credit quality of term deposits with scheduled banks which are subject to the regulatory oversight of the Reserve Bank of India to be good, and we review these banking relationships on an ongoing basis. Credit risk related to employee loans are considered negligible since major loans like house building loans, vehicle loans etc are secured against the property for which loan is granted to the employees. The other employee loans are covered under personal guarantee of concerned employees along with surety bonds of other serving employees. There are no impairment provisions as at each reporting date against these financial assets. We consider all the above financial assets as at the reporting dates to be of good credit quality.

c) Liquidity Risk

Our liquidity needs are monitored on the basis of monthly and yearly projections. The company's principal sources of liquidity are cash and cash equivalents, cash generated from operations and availability of funding through an adequate amount of committed credit facilities to meet obligations when due.

Due to the dynamic nature of underlying businesses, the company maintains flexibility in funding by maintaining availability under committed credit lines.

Short term liquidity requirements consists mainly of sundry creditors, expense payable, employee dues arising during the normal course of business as of each reporting date. The company maintains sufficient balance in cash and cash equivalents to meet short term liquidity requirements.

The company assesses long term liquidity requirements on a periodical basis and manages them through internal accruals and committed credit lines.

The table below provides details regarding the contractual maturities of non-derivative financial liabilities. The table has been drawn up based on the undiscovered cash flows of financial liabilities based on the earliest date on which the company can be required to pay. The table includes both principal & interest cash flows.

(₹ in crore as at March 31, 2022)

Particulars	Less than 6 months	6 months to 1 year	1-3 years	3-5 years	More than 5 years	Total
(i) MSME	0.18	-	-	-	-	0.18
(ii) Others	534.20	-	-	-	-	534.20
(iii) Disputed dues – MSME	-	-	-	-	-	0.00
(iv) Disputed dues - Others	-	-	-	-	-	0.00



(₹ in crore as at March 31, 2021)

Particulars	Less than 6 months	6 months to 1 year	1-3 years	3-5 years	More than 5 years	Total
(i) MSME	0.03					0.03
(ii) Others	998.28					998.28
(iii) Disputed dues – MSME						0.00
(iv) Disputed dues - Others		-	-			0.00

38. Impact of Hedging Activities

38.1 Cash Flow Hedge

As at 31st March 2022 there was no outstanding Hedging Instrument on account of the company.

38.2 Fair Value Hedge

As per the Risk Management Policy, the company enters into forward contracts with commodity exchanges to hedge against price fluctuations in gold and silver inventories. The gain or loss on the hedging instrument is recognized in profit or loss. The hedging gain or loss on the hedged item adjusts the carrying amount of the hedged item and is recognised in profit or loss.

a. Disclosure of effects of hedge accounting on financial position for hedging instruments:

(₹ in crore as at March 31, 2022)

Type of Hedge and risk	Carrying amount of hedging instrument		Change in fair value of hedging instrument used as the basis for recognizing hedge ineffectiveness for the period	Nominal amounts of the hedging instruments	
	Assets	Liabilities		Quantity (kgs)	Value
Fair Value hedge					
Price Risk					
Forward contract to sell gold	10.99	-	-	30	0.21
Forward contract to sell Silver	12.81	-	-	240	0.18

(₹ in crore as at March 31, 2021)

Type of Hedge and risk	Carrying amount of hedging instrument		Change in fair value of hedging instrument used as the basis for recognizing hedge ineffectiveness for the period	Nominal amounts of the hedging instruments	
	Assets	Liabilities		Quantity (kgs)	Value
Fair Value hedge					
Price Risk					
Forward contract to sell gold	12.91	-	-	33	3.74

Disclosure of effects of hedge accounting on financial position for hedged items:

(₹ in crore as at March 31, 2022)

Type of Hedge and risk	Carrying amount of hedged item		Accumulated amount of hedge adjustments on the hedged item included in the carrying amount of hedged item	Line item in the Balance Sheet in which the hedged item is included	Changes in value used as the basis for recognizing hedge ineffectiveness	Accumulated amount of hedge adjustments remaining in the balance sheet for any hedged items that have ceased to be adjusted for hedging gains and losses (para 6.5.10 of IndAS 109)
Fair Value hedge						
Price Risk						
Inventory of gold	-	-	-	Inventories	-	-

(₹ in crore as at March 31, 2021)

Type of Hedge and risk	Carrying amount of hedged item		Accumulated amount of hedge adjustments on the hedged item included in the carrying amount of hedged item	Line item in the Balance Sheet in which the hedged item is included	Changes in value used as the basis for recognizing hedge ineffectiveness	Accumulated amount of hedge adjustments remaining in the balance sheet for any hedged items that have ceased to be adjusted for hedging gains and losses (para 6.5.10 of IndAS 109)
Fair Value hedge						
Price Risk						
Inventory of gold	-	-	-	Inventories	-	-

39. Disclosure in respect of Indian Accounting Standard (Ind AS) - 36 "Impairment of assets"

During the year, the company assessed the impairment loss of assets and accordingly provision towards impairment in the value of PPE amounting to ₹ Nil (P.Y. ₹ Nil) has been made during the year.

40. Disclosure in respect of Indian Accounting Standard (Ind AS)-19 "Employee Benefits"

40.1 General description of various employee's benefits schemes are as under:

a) Gratuity:

Gratuity is paid to all employees on retirement/separation based on the number of years of service. The scheme is funded by the Company and is managed by a separate Trust through LIC. In case of MICA division employees the scheme is managed directly by the company through LIC. The scheme is funded by the company and the liability is recognized on the basis of contribution payable to the insurer, i.e., the Life Insurance Corporation of India, however, the disclosure of information as required under Ind AS-19 have been made in accordance with the actuarial valuation.

As per Actuarial Valuation company's expected contribution for FY 2022-23 towards the Gratuity Fund Contribution is ₹ 2.42 crores (P.Y. ₹ 3.78 crores). However, the company is making contribution to the fund as per the demand made by Life Insurance Corporation of India.

b) Leave Compensation:

Payable on separation to eligible employees who have accumulated earned and half pay leave. Encashment of accumulated earned leave is also allowed during service leaving a minimum balance of 15 days twice in a year.

The liability on this account is recognized on the basis of actuarial valuation.

c) Long Service Benefits: Long Service Benefits payable to the employees are as under :-

(i) Service Award:

Service Award amounting to ₹ 3,500/- for each completed year of service is payable to the employees on superannuation/voluntary retirement scheme.

(ii) Compassionate Gratuity

Compassionate Gratuity amounting to ₹ 50,000/- is payable in lump-sum to the dependants of the employee on death while in service.

(iii) Employees' Family Benefit Scheme

Payments under Employees' Family Benefit Scheme is payable to the dependants of the employee who dies in service till the notional date of superannuation. A monthly benefit @ 40% of Basic Pay & DA last drawn subject to a maximum of ₹ 12,000/- on rendering service of less than 20 years and similarly a monthly benefit @ 50% of Basic Pay & DA last drawn subject to maximum ₹ 12,000/- on rendering service of 20 years or more at the time of death.

(iv) Special Benefit to MICA Division employees amounting to ₹ 5,00,000/- (Officer), ₹ 4,00,000/- (Staff) and ₹ 3,00,000/- (Worker) upon retirement

The summarized position of various defined benefits recognized in the Statement of Profit & Loss, Other Comprehensive Income (OCI) and Balance Sheet & other disclosures are as under:-

Net defined benefit obligation.


Net defined benefit obligation

(₹ in crore)

Particulars		Gratuity	Earned Leave	Sick Leave	Long Service Award	Special Benefit	Compassionate Gratuity	Employee Family Benefit
		(Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)
Defined Benefit Obligation	C.Y.	69.26	18.57	20.15	3.58	1.49	0.10	2.80
	P.Y.	90.85	16.01	20.59	4.35	1.85	0.12	3.63
Fair Value of Plan Assets	C.Y.	70.35	-	-	-	-	-	-
	P.Y.	82.45	-	-	-	-	-	-
Funded Status [Surplus/(Deficit)]	C.Y.		-	-	-	-	-	-
	P.Y.		-	-	-	-	-	-
Effect of asset ceiling	C.Y.		-	-	-	-	-	-
	P.Y.		-	-	-	-	-	-
Net Defined Benefit Assets/(Liabilities)	C.Y.	1.09	(18.57)	(20.15)	(3.58)	(1.49)	(0.10)	(2.80)
	P.Y.	(8.41)	(16.01)	(20.59)	(4.35)	(1.85)	(0.12)	(3.63)

Movement in defined benefit obligation

(₹ in crore)

Particulars		Gratuity	Earned Leave	Sick Leave	Long Service Award	Special Benefit	Compassionate Gratuity	Employee Family Benefit
		(Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)
Defined benefit obligation- Beginning of the year	C.Y.	90.85	16.01	20.59	4.35	1.85	0.12	3.63
	P.Y.	98.90	14.44	21.89	4.85	2.15	0.16	4.02
Current service cost	C.Y.	1.40	0.83	0.78	0.12	0.04	-	-
	P.Y.	3.28	0.76	0.82	0.15	0.05	-	-
Past Service Cost	C.Y.	0.00	-	-	-	-	-	-
	P.Y.	0.00	-	-	-	-	-	-
Interest Cost	C.Y.	5.83	1.03	1.32	0.28	0.12	-	-
	P.Y.	6.53	0.95	1.44	0.32	0.14	-	-
Benefits Paid	C.Y.	(17.59)	(3.04)	(2.94)	(0.36)	(0.41)	-	-
	P.Y.	(11.29)	(4.57)	(2.54)	(0.79)	(0.41)	-	-
Re-measurements - actuarial loss/(gain)	C.Y.	(11.23)	3.74	0.40	(0.80)	(0.11)	(0.02)	(0.84)
	P.Y.	(6.56)	4.43	(1.02)	(0.18)	(0.09)	(0.04)	(0.39)
Defined benefit obligation - End of the year	C.Y.	69.26	18.57	20.15	3.58	1.49	0.10	2.80
	P.Y.	90.85	16.01	20.59	4.35	1.85	0.12	3.63

Movement in plan asset

(₹ in crore)

Particulars	Gratuity (Funded)	
	31.03.2022	31.03.2021
Fair value of plan assets at beginning of year	82.45	87.78
Interest income	5.50	5.90
Employer contributions	0.00	0.06
Benefits paid	(17.59)	(11.29)
Re-measurements - Actuarial (loss)/ gain	(0.00)	(0.01)
Fair value of plan assets at end of year	70.35	82.45

Amount Recognized in Statement of Profit and Loss

(₹ in crore)

Particulars		Gratuity	Earned Leave	Sick Leave	Long Service Award	Special Benefit	Compassionate Gratuity	Employee Family Benefit
		(Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)
Current service cost	C.Y.	1.40	0.83	0.78	0.12	0.04		
	P.Y.	3.28	0.76	0.82	0.15	0.05		
Past Service Cost – Plan Amendment	C.Y.	0.00	-	-	-	-		
	P.Y.		-	-	-	-		
Service Cost (A)	C.Y.	1.40	0.83	0.78	0.12	0.04		
	P.Y.	3.28	0.76	0.82	0.15	0.05		
Net Interest on Net Defined Benefit Liability/(assets) (B)	C.Y.	0.54	1.03	1.32	0.28	0.12		
	P.Y.	0.73	0.95	1.44	0.32	0.14		
Net actuarial (gain) / loss recognized in the period	C.Y.	-	3.74	0.40	-	-	(0.02)	(0.84)
	P.Y.	-	4.43	(1.02)	-	-	(0.04)	(0.39)
Cost Recognized in P&L (A+B)	C.Y.	1.94	5.60	2.50	0.40	0.16	(0.02)	(0.84)
	P.Y.	4.01	6.15	1.25	0.47	0.19	(0.04)	(0.39)

Amount recognized in Other Comprehensive Income (OCI)

(₹ in crore)

Particulars		Gratuity	Earned Leave	Sick Leave	Long Service Award	Special Benefit	Compassionate Gratuity	Employee Family Benefit
		(Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)	(Non-Funded)
Actuarial gain/(loss) due to DBO Experience	C.Y.	11.23	-	-	(0.19)	0.07	-	-
	P.Y.	6.56	-	-	0.21	0.11	-	-
Actuarial gain/(loss) due to assumption changes	C.Y.	-	-	-	(0.17)	(0.18)	-	-
	P.Y.	-	-	-	(0.03)	(0.02)	-	-
Actuarial gain/(loss) arising during the period (A)	C.Y.	11.23	-	-	(0.36)	(0.11)	-	-
	P.Y.	6.56	-	-	0.18	0.09	-	-
Return on Plan assets (greater)/less than discount rate (B)	C.Y.	0.20	-	-	-	-	-	-
	P.Y.	0.10	-	-	-	-	-	-
Actuarial gain/(loss) recognized in OCI (A+B)	C.Y.	11.44	-	-	(0.36)	(0.11)	-	-
	P.Y.	6.66	-	-	0.18	0.09	-	-

Sensitivity Analysis

(₹ in crore as at March 31, 2022)

Assumption	Change in Assumption	Gratuity	Earned Leave	Sick Leave	Long Service Benefits	Special Benefit	Compassionate Gratuity	Employee Family Benefit
		(Funded)	(Non Funded)	(Non Funded)	(Non Funded)	(Non Funded)	(Non Funded)	(Non Funded)
Discount rate	0.50%	(1.49)	(0.46)	(0.44)	(0.06)	(0.04)	-	-
	-0.50%	1.57	0.49	0.46	0.07	0.04	-	-
Salary growth rate	0.50%	0.36	0.49	0.46	-	-	-	-
	-0.50%	(0.41)	(0.47)	(0.44)	-	-	-	-

(₹ in crore as at March 31, 2021)

Assumption	Gratuity		Change in Assumption	Earned Leave	Sick Leave	Long Service Benefits	Special Benefit	Compassionate Gratuity	Employee Family Benefit
	Change in Assumption	(Funded)							
Discount rate	0.50%	(2.05)	(0.42)	(0.46)	(0.08)	(0.04)	-	-	-
	-0.50%	2.07	0.44	0.48	0.09	0.05	-	-	-
Salary growth rate	0.50%	2.07	0.44	0.48	-	-	-	-	-
	-0.50%	(2.07)	(0.42)	(0.46)	-	-	-	-	-

Actuarial Assumption

Assumption		Gratuity	Earned Leave	Sick Leave	Long Service Benefits	Special Benefit	Compassionate Gratuity	Employee Family Benefit
		(Funded)	(Non Funded)	(Non Funded)	(Non Funded)	(Non Funded)	(Non Funded)	(Non Funded)
Method used	C.Y.	Projected Unit Credit	Projected Unit Credit	Projected Unit Credit	Projected Unit Credit	Projected Unit Credit	Projected Unit Credit	Projected Unit Credit
	P.Y.	Projected Unit Credit	Projected Unit Credit	Projected Unit Credit	Projected Unit Credit	Projected Unit Credit	Projected Unit Credit	Projected Unit Credit
Discount rate	C.Y.	6.69%	6.69%	6.69%	6.69%	6.69%	6.69%	6.69%
	P.Y.	6.42%	6.42%	6.42%	6.42%	6.42%	6.42%	6.42%
Rate of salary increase	C.Y.	6.00%	6.00%	6.00%	-	-	-	-
	P.Y.	6.00%	6.00%	6.00%	-	-	-	-
Mortality rate	C.Y.	IALM (2012-14)	IALM (2012-14)	IALM (2012-14)	IALM (2012-14)	IALM (2012-14)	IALM (2012-14)	IALM (2012-14)
	P.Y.	IALM (2006-08)	IALM (2006-08)	IALM (2006-08)	IALM (2006-08)	IALM (2006-08)	IALM (2006-08)	IALM (2006-08)



Expected Benefit Payments

(₹ in crore)

Sr. No.	Year of payment	Gratuity	Earned Leave	Sick Leave	Long Service Benefits	Special Benefit	Compassionate Gratuity	Employee Family Benefit
		(Funded)	(Non Funded)	(Non Funded)	(Non Funded)	(Non Funded)	(Non Funded)	(Non Funded)
1	0 to 1 Year	11.80	3.17	3.55	0.71	0.42	-	-
2	1 to 2 Year	11.46	2.75	3.71	0.68	0.30	-	-
3	2 to 3 Year	8.44	2.25	2.11	0.47	0.26	-	-
4	3 to 4 Year	6.11	1.40	1.72	0.29	0.28	-	-
5	4 to 5 Year	7.06	2.02	2.14	0.35	0.13	-	-
6	5 to 6 Year	5.75	1.71	1.97	0.30	0.00	-	-
7	6 Year onwards	18.64	5.26	4.96	0.78	0.11	-	-

Category of investment in Plan assets

Category of Investment	% of fair value of plan assets
Insured benefits	100%

- d) Provident Fund: The Company's contribution paid/payable during the year to Provident Fund and the liability is recognized on accrual basis. The Company's Provident Fund Trust is exempted under Section 17 of Employees' Provident Fund and Miscellaneous Provisions Act, 1952. The conditions for grant of exemptions stipulate that the employer shall make good deficiency, if any, in the interest rate declared by the Trusts vis-à-vis statutory rate. The company does not anticipate any further obligations in the near foreseeable future having regard to the assets of the funds and return on investment.
- e) Superannuation Pension Benefit – During the year, the Company has recognized ₹ 4.08 crores (P.Y. ₹ 4.59 crores) towards Defined Contribution Superannuation Pension Scheme in the Statement of Profit & Loss.
- f) Post-Retirement Medical Benefit: Available to retired employees at empanelled hospitals for inpatient treatment and also for OPD treatment under 'Defined Contribution Scheme' as under:
- a. The liability @ 1.50% of PBT for the year in respect of scheme for retirees prior to 1.1.2007 (closed group) has been not been recognised on the basis of affordability even though company has reported profit before tax ₹101.08 crores during the year. Also, the company has not provided for PRMBS for open group @ 4.50% Basic+DA for serving employees. During the year provision in respect retirees after 1.1.2007 pertaining to year 2019-20 & 2020-21 has been withdrawn due loss during those year. Same will be reviewed during FY 2022-23.
- b. During 2019-20, the company has created trust for management of fund and paid ₹150.00 crores to trust against company's liability towards the scheme. Net Liability has been shown as company's obligation as on 31.3.2022 under 'Defined Contribution Scheme'.

41. Group Information

1. Subsidiaries

The group's subsidiaries are set out below. They have share capital consisting solely of equity shares that are held directly by the group and the proportion of ownership interests held equals the voting rights held by the group. The country of incorporation or registration is also their principal place of business.

S.No.	Name of Subsidiary	Principal Activity	Place of Incorporation	Ownership Interest held by the group	
				31.3.2022	31.3.2022
1	MMTC Transnational Pte Ltd.	Trading in Minerals, Metals, Fertilizers, Agro products, Coal & Hydrocarbons, Bullion, Jewellery and other commodities	Singapore	100% (Non-Controlling Interest NIL)	100% (Non-Controlling Interest NIL)

2. Joint Ventures

The details of Joint Ventures in which the Group is a Joint Ventures are set out below. They have share capital consisting of equity shares that are held directly by the group and the proportion of ownership interests held equals the voting rights held by the group. The country of incorporation or registration is also their principal place of business.

Sr.No	Name of Joint Venture	Principal Activity	Place of Incorporation	Ownership Interest held by the group		Accounting Method
				31.03.2022	31.03.2021	
1	MMTC Gitanjali Limited (i)	Trading in gold and silver coins, gold jewellery, diamond studded jewellery, lifestyle jewellery	India	26%	26%	Equity Method
2	MMTC PAMP India Pvt. Ltd.	Trading in Gold and silver bars, coins and related items and refining of gold and silver doros.	India	26%	26%	Equity Method
3	SICAL Iron Ore Terminal Limited (iii)	The company has set up its Iron Ore Terminal Facility	India	26%	26%	Equity Method
4	Neelachal Ispat Nigam Limited	Iron & steel plant with captive power plant	India	49.78%	49.78%	Equity Method
5	Free Trade Ware- housing Pvt. Ltd.	Development of free trade warehousing zones in India	India	50%	50%	Equity Method

- (i) The company has fully impaired its equity investment of ₹ 2.99 crore in its joint venture- M/s MMTC Gitanjali Limited during the year 2017-18 in view of the report of defaults made by the main promoter, as per the media reports the investigations launched by the investigating agencies against them and considering the fact that JV Company has suspended its business activities. The company has also given notice for exiting from the JV Company. The financial statements have not been received from the JV Company for 2021-22, hence the same is also not considered for the purpose of consolidation.
- (ii) The company made 100% provision towards impairment in equity investment of ₹ 33.80 crore in its JV M/s SICAL Iron Ore Terminal Ltd.
- (iii) Quoted fair value: All the above joint ventures are unlisted entities and hence no quoted price is available. The details of carrying amount is given in Note no. 6

3. Entities Consolidated

The following entities are considered for consolidation purpose:-

3. Entities Consolidated

The following entities are considered for consolidation purpose:-

Sl.No.	Name of Entity	Status	Financial Statements Adopted
1.	MMTC Transnational Pte Ltd.	Subsidiary	Audited
2.	MMTC PAMP India Pvt. Ltd.	Joint Venture	Audited
3.	Neelachal Ispat Nigam Limited	Joint Venture	*
4.	Free Trade Ware- housing Pvt. Ltd.	Joint Venture	*

* Audited financial statements for 2021-22 not received.

The following entities are not considered for consolidation purpose due to investment is fully impairment.

Sl.No.	Name of Entity	Status	Reason for not consolidating
1.	MMTC Gitanjali Limited	Joint Venture	Refer note no.41.2(i) above
2.	SICAL Iron Ore Terminal Limited	Joint Venture	Refer note no.41.2(ii) above



4. Unrecognized Losses of Joint Ventures

The unrecognized share of losses of the Joint Venture, as the group has stopped recognizing its share of losses of the joint venture being exceeded the carrying value of investment, while applying the equity method, is given below :-

Sl.No	Name of Joint Venture	Cumulative Balance as at 31.3.2022	For the year ended 31.3.2022	For the year ended 31.3.2022	For the year ended 31.3.2020	For the year ended 31.3.2019	For the year ended 31.3.2019
1	Neelachal Ispat Nigam Limited	1,734.22	Not Recd	459.32	799.88	200.90	186.89
2	Free Trade Warehousing Pvt. Ltd.	19.68	Not Recd	6.79	9.06	1.45	1.38

Audited Financial Statements for 2021-22 not received.

42. Information regarding Joint Ventures

(₹ in crore)

Summarized Balance Sheet	MMTC-PAMP India Private Limited		Neelachal Ispat Nigam Limited		Free Trade Warehousing Pvt. Ltd.	
	31-Mar-22	31-Mar-21	31-Mar-22*	31-Mar-21	31-Mar-22*	31-Mar-21
Current Assets						
Cash and Cash equivalents	32.95	70.01		28.19		0.09
Other Assets	2,979.19	1,671.38		336.72	-	-
Total Current Assets	3,012.14	1,741.39		364.91	-	0.09
Total Non current Assets	327.78	330.85		2,561.35		33.60
Current Liabilities						
Financial Liabilities (excluding trade payables and provisions)	1,398.85	1,339.60		2,550.61		0.01
Other Liabilities	1,528.98	332.76		2,624.01		7.66
Total Current Liabilities	2,927.83	1,732.36		5,174.62	-	7.67
Non current Liabilities						
Financial Liabilities (excluding trade payables and provisions)	40.92	3.91		996.55	-	-
Other Liabilities	32.55	28.80		242.50		65.38
Total Non Current Liabilities	73.47	32.71		1,239.05	-	65.38
Net Assets	338.62	307.17		(3,487.41)	-	(39.36)

Particulars	MMTC-PAMP India Private Limited		Neelachal Ispat Nigam Limited		Free Trade Warehousing Pvt. Ltd.	
	2021-22	2020-21	2021-22*	2020-21	2021-22*	2020-21
Revenue	29,269.77	20,372.37	-	24.16	-	0.46
Interest income	2.45	16.33		2.35		-
Depreciation and amortization	24.60	25.02		146.34		0.82
Interest expense	46.05	61.59		203.23		0.17
Income tax expense	15.36	2.16	-	-		-
Profit from continuing operations	44.79	3.06		(921.30)		(13.60)
Profit from discontinued operations (Post tax)	-	-		-	-	-
Profit for the year	44.79	3.06	-	(921.30)	-	(13.60)
Other comprehensive income	(0.37)	1.30		(1.40)		-
Total Comprehensive income	44.42	4.36	-	(922.70)	-	(13.60)

Particulars	MMTC-PAMP India Private Limited		Neelachal Ispat Nigam Limited		Free Trade Warehousing Pvt. Ltd.	
	31-Mar-22	31-Mar-21	31-Mar-22*	31-Mar-21	31-Mar-22*	31-Mar-21
Opening net assets	307.17	302.81	(3,487.41)	(2,564.71)	(39.36)	(25.76)
Profit for the year	44.79	3.06	-	(921.30)	-	(13.60)
Other comprehensive income	(0.37)	1.30	-	(1.40)	-	-
Other Adjustments	-	-	-	-	-	-
Advance against equity	-	-	-	-	-	-
Closing net assets	351.59	307.17	(3,487.41)	(3,487.41)	(39.36)	(39.36)
Group's share in %	26%	26%	49.78%	49.78%	50%	50%
Group's share in INR	91.41	79.87	(1,736.03)	(1,736.03)	(19.68)	(19.68)
Goodwill/(Capital Reserve)	-	-	-	-	-	-
Carrying amount **	91.41	79.87	-	-	-	-

* Financial Statements as on 31.3.2022 not received.

The carrying amount of investment in case of JV Company, NINL & FTWPL is NIL as group's share in loss of Joint Venture Company exceeds the carrying amount of investment in respective Joint venture company. The carrying amount of investment in respect of JV Company MMTC Gitanjali Ltd. and SICAL Iron Ore Terminal Ltd is NIL as the group's equity investment in the JV has been fully impaired.

43. Disclosure in respect of Indian Accounting standard (Ind AS)-108: "Operating Segments"

Based on the "management approach" as defined in Ind AS 108, the Chief Operating Decision Maker (CODM) evaluates the company's performance and allocates resources based on an analysis of various performance indicators by business segments. Accordingly, information has been presented for each business segment. The accounting principles used in the preparation of the financial statements are consistently applied to record revenue and expenditure in individual business segments, and are as set out in the significant accounting policies. Business segments of the company are:-Precious Metals, Metals, Minerals, Coal & Hydrocarbon, Agro Products, Fertilizer and Others

Segment Revenue and Expense

Segment assets include all operating assets in respective segments comprising of net fixed assets and current assets, loans and advances etc. Assets relating to corporate and construction are included in unallocated segments. Segment liabilities include liabilities and provisions directly attributable to respective segment.

Segment revenues and results

(₹ in crore as at March 31, 2022)

Particulars	Precious Metals	Metals	Minerals	Coal & Hydro-Carbon	Agro Products	Fertilizers	Others	Total
Segment Revenue from External Customers								
Within India	6013.01	30.33	0.01	751.09	75.60	1459.83	28.53	8,358.41
Outside India	0.00	78.46	125.14	7.90	3217.59	(0.00)	8.89	3,437.98
Inter-Segment Revenue								
Total Segment Revenue	6013.01	108.79	125.15	758.99	3293.19	1459.83	37.42	11796.39
Segment Results								
Within India	27.73	0.18	0.01	547.84	2.74	10.11	3.27	591.88
Outside India	-	0.38	2.13	0.08	10.58	0.04	0.37	13.58
Total segmental results	27.73	0.56	2.14	547.92	13.32	10.15	3.64	605.45
Unallocated Corporate expenses:								
Interest expenses (net)								204.23
Other unallocated expenses net of other income								311.79
Profit before tax from ordinary activities								89.43



(₹ in crore as at March 31, 2021)

Particulars	Precious Metals	Metals	Minerals	Coal & Hydro-Carbon	Agro Products	Fertilizers	Others	Total
Segment Revenue from External Customers								
Within India	14029.93	74.03	1.32	586.14	671.45	9185.83	28.17	24576.86
Outside India	0.00	231.40	1817.87	233.80	3127.46	6.11	7.96	5424.61
Inter-Segment Revenue								
Total Segment Revenue	14029.93	305.43	1819.20	819.94	3798.90	9191.54	36.14	30001.47
Segment Results								
Within India	53.13	0.80	1.32	(30.73)	7.02	29.40	2.97	63.91
Outside India	-	0.93	50.39	1.34	11.77	0.07	0.25	64.75
Total segmental results	53.13	1.72	51.72	(29.39)	18.78	29.47	3.22	128.66
Unallocated Corporate expenses:								
Interest expenses (net)								193.24
Other unallocated expenses net of other income								1048.56
Profit before tax from ordinary activities								(1113.14)

Segment assets and liabilities

(₹ in crore as at March 31, 2022)

Particulars	Precious Metals	Metals	Minerals	Coal & Hydro-Carbon	Agro Products	Fertilizers	Others	Total
A.01 Segment Assets :								
Assets	87.55	7.73	23.58	3695.73	462.56	17.42	416.46	4711.03
Unallocated assets								72.36
Total Assets								4783.39
A.02 Segment Liabilities :								
Liabilities	109.54	27.34	28.41	1353.66	616.68	31.41	17.35	2184.38
Unallocated liabilities								2747.10
Total Liabilities								4931.48

(₹ in crore as at March 31, 2021)

Particulars	Precious Metals	Metals	Minerals	Coal & Hydro-Carbon	Agro Products	Fertilizers	Others	Total
A.01 Segment Assets :								
Assets	427.26	19.21	333.84	3514.83	666.84	19.74	39.99	5023.69
Unallocated assets								450.15
Total Assets								5473.86
A.02 Segment Liabilities :								
Liabilities	442.64	38.67	344.50	1200.13	722.51	19.88	23.71	2792.02
Unallocated liabilities								2582.12
Total Liabilities								5374.12

Information about major customers

The revenues from transactions with a single external customer amounting to 10 per cent or more of the entity's revenues are given below:

Major Customer (customer having more than 10% revenue)	2021-22	2020-21
Total Revenue	1458.90	9177.84
No. of customers	1	1
% of Total Revenue	12.37%	30.59%
Product Segment	Fertilizers	Fertilizers

44. Disclosure in respect of Indian Accounting Standard 24 “Related Parties Disclosures”

44.1 Disclosures for Other than Govt. Related Entities

a. List of key management personnel

Name	Designation
i. Shri Sanjay Chadha	Chairman and Managing Director- (Managing Director) (w.e.f. 14.05.2020 upto 28.2.2020)
ii. Shri Vibhu Nayar	Chairman and Managing Director- (Managing Director) (w.e.f. 01.03.2022)
iii. Shri Kapil Kumar Gupta	Director(F) & (Chief Financial Officer)
iv. Shri J Ravi Shanker	Director
v. Shri R R Sinha	Director (Personnel)
vi Shri T.S. Rao	Managing Director, MTPL
vii. Shr Debashish Nayak	Director (F), MTPL

b. Subsidiary

MMTC Transnational Pte. Ltd., Singapore

c. Joint Venture:-

- Neelachal Spat Nigam Ltd
- Free Trade Warehousing Pvt. Ltd.
- MMTC Pamp India Pvt. Ltd.
- MMTC Gitanjali Ltd.
- Sical Iron Ore Terminal Ltd.

d. Government and its related entities

- Government of India - holds 89.93% equity shares of the Company and has control over the company.
- Central Public Sector Enterprises in which Government of India has control.

e. Post-Employment Benefit Plan

- MMTC Limited CPF Trust
- MMTC Limited Gratuity Trust
- MMTC Limited Employees' Defined Contribution Superannuation Trust
- MMTC Employees Post-Retirement Medical Benefit Trust

f. Compensation of key management personnel

(₹ in crore)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Short-term benefits	3.77	4.35
Post-employment benefits	0.42	0.48
Other long-term benefits	-	-
Share-based payments	-	-
Termination benefits	-	-
Total	4.19	4.81
Recovery of Loans & Advances during the year	-	-
Advances released during the year	-	-
Closing Balance of Loans & Advances as on 31.03.2020	-	0



(₹ in crore)

g. Transactions with Related Parties

Particulars	MMTC Gitanjali Private Limited		MMTC PAMP India Private Limited		Sical Iron Ore Terminal Limited		Indian Commodity Exchange Limited		MTPPL		Neelachal Ispat Nigam Limited		Free Trade Warehousing Pvt. Ltd.		Others	
	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21
Sale of goods and services	-	-	2.41	2.51	-	-	-	-	-	-	-	2.08	-	-	-	-
Purchase of raw material/ goods and services	-	-	78.94	107.12	-	-	-	-	0.91	1.74	232.36	25.38	-	-	-	-
Payments on behalf of company	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	88.05
Other transactions	-	-	-	-	-	-	-	-	37.18	28.64	1.49	-	-	-	-	19.47

(₹ in crore)

h. Outstanding balances arising from sale/purchase of goods/services

Particulars	MMTC Gitanjali Private Limited		MMTC PAMP India Private Limited		Sical Iron Ore Terminal Limited		Indian Commodity Exchange Limited		MTPPL		Neelachal Ispat Nigam Limited		Free Trade Warehousing Pvt. Ltd.	
	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21
Trade Payables	0.02	0.02	-	-	-	-	-	-	-	0.76	-	1.46	-	-
Trade receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Other Payables	-	-	-	0.03	-	-	-	-	-	-	-	-	-	-
Other Receivables	-	-	-	-	-	-	-	-	0.06	0.09	-	-	-	-

(₹ in crore)

i. Loans to Joint Ventures

Particulars	MMTC Gitanjali Private Limited		MMTC PAMP India Private Limited		Sical Iron Ore Terminal Limited		Indian Commodity Exchange Limited		MTPPL		Neelachal Ispat Nigam Limited		Free Trade Warehousing Pvt. Ltd.	
	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21
Loans at beginning of the year	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Loan advanced	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Repayment received/adjusted	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Interest charged	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Interest received	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Balance at end of the year including interest	-	-	-	-	-	-	-	-	-	-	-	-	-	-

(₹ in crore)

j. Advance to Joint Ventures

Particulars	MMTC Gitanjali Private Limited		MMTC PAMP India Private Limited		Sical Iron Ore Terminal Limited		Indian Commodity Exchange Limited		MTPPL		Neelachal Ispat Nigam Limited		Free Trade Warehousing Pvt. Ltd.		Kandla Free Trade Warehousing Pvt. Ltd.	
	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21	Mar/22	Mar/21
Advance Given	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

I. Loans to KMP

Particulars	March / 22	March /21
Loans at beginning of the year	0.00	0.00
Loans advanced	-	-
Repayment received	0.00	-
Interest charged	-	-
Interest received	-	0.00
Balance at end of the year including interest	-	-

l. Loans to related parties are for short term & to KMP are in the nature of welfare advances. Interest is charged basis market rates from time to time.

m. Disclosure for transactions entered with Govt. and Govt. Entities

S. No.	NAME OF GOVT/ GOVT ENTITIES	NATURE OF RELATIONSHIP WITH THE COMPANY	NATURE OF TRANSACTIONS	VALUE (RS)	OUTSTANDING BALANCE	
					RECEIVABLE	PAYABLES
1	Deptt. of Fertilizer GOI	Majority Owner	Sale of Goods	1458.90	14.40	-
2	Deptt. of Consumer Affairs GOI	Majority Owner	Import of Pulses	-	-	35.45
3	Other Departments of Govt. of India	Majority Owner	Purchase/Sale of Goods	153.80	94.06	5.82
4.	CPSEs	Related through GOI	Purchase/Sale of Goods	42.57	13.63	0.34

45 Disclosure in respect of Indian Accounting standard (Ind AS) 116 “Leases”

45.1 As lessee

a) Finance leases: The Company does not have any finance lease arrangement during the period.

b) Operating lease

(₹ in crore)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
1 Depreciation charge for right of use assets	1.08	1.07
2 Interest expense on lease liabilities	0.36	0.150
3 Expense on short term leases	-	-
4 Expense on low value assets	-	-
5 Expense relating to variable lease payments not included in measurement of lease liability	-	-
6 Income from subleasing right of use assets	-	-
7 Total cash outflow for leases	1.41	1.51
8 Addition to right of use assets	0.01	0.14
9 Carrying amount of right of use assets at the end of the reporting period	3.14	3.35

Maturity analysis of lease liabilities

(₹ in crore)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Not later than 1 year	0.11	0.37
Later than 1 year and not later than 5 years	0.42	0.42
Later than 5 years	3.12	3.23

c) The company is using the right of use assets for operating its business activities.

d) As a practical expedient, short term leases (having a term of 12 months or less) and leases for which the underlying assets is of low value upto ₹ 1,00,000/- per month and ₹ 12,00,000/- per year are not recognized as per the provisions given under Ind AS-116 (Leases).

45.2 As a lessor

a) Finance leases: The Company does not have any finance lease arrangement during the period.

b) Operating leases

- Future minimum lease receivables under non-cancellable operating lease



(₹ in crore)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Not later than 1 year	1.73	1.50
Later than 1 year and not later than 5 years	2.16	3.89
Later than 5 years	-	-

46. Disclosure in respect of Indian Accounting Standard (Ind AS)-33 “Earnings Per Share(EPS)”

Basic & Diluted EPS

The earnings and weighted average number of ordinary shares used in the calculation of basic & diluted EPS and Basic EPS is as follows:

(₹ in crore)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Profit (loss) for the year, attributable to the owners of the company (in crore)	(262.38)	(789.28)
Weighted average number of ordinary shares for the purpose of basic earnings per share	1,500,000,000	1,500,000,000
Basic & Diluted EPS (In)	(1.75)	(5.26)

47. Disclosure in respect of Indian Accounting Standard (Ind AS)-37 “Provisions, Contingent Liabilities and Contingent Assets”

(₹ in crore)

Particulars of Provision	Opening Balance as on 01.04.21	Adjustment during year	Addition during year	Closing Balance as on 31.03.2022
Destinational Weight & Analysis Risk	0.08	0.08	-	0.00
Bonus/PRP	17.84	14.63	0.29	3.50
Provision for Litigation Settlements	888.81	(0.14)	178.44	1067.39

48. Disclosure in respect of Indian Accounting Standard (Ind AS)-115: “Revenue from Contract with Customers”

Disclosure

A. (i) Contracts with customers

a) Company has recognized the following revenue during the year from contracts with its customers

(₹ in crore)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Sale of products	11237.80	29970.20
Sale of services	4.50	2.91
Other operating revenue		
-Claims	0.15	25.90
-Subsidy	-	-
-Despatch Earned	1.43	11.25
-Other Trade Income	552.36	(8.79)
Total	11796.24	30001.47

a) Company has recognized the following amount as impairment loss against the amount receivables from its customers or contract assets arising due to contract with its customers.

(₹ in crore)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Impairment Loss	-	1.06

(ii) Disaggregation of Revenue

The Company has identified its Operating Segments as Minerals, Precious Metals, Metals, Agro Products, Coal & Hydrocarbon, Fertilizer and General Trade/others. The segment wise revenue generated from the contract with customers and its proportion in total revenue is as follows:-

(₹ in crore)

Particulars	For the year ended March 31, 2022	As % to Total Revenue	For the year ended March 31, 2021	As % to Total Revenue
Precious Metals	6,013.01	50.97	14,029.93	46.76
Metals	108.79	0.92	305.43	1.02
Minerals	125.15	1.06	1,819.20	6.06
Coal & Hydrocarbon	758.99	6.43	819.94	2.73
Agro Products	3,293.19	27.92	3,798.90	12.66
Fertilizers	1,459.83	12.38	9,191.94	30.64
Others	37.42	0.32	36.14	0.12
Total	11,796.39	100.00	30,001.47	100.00

(iii) Contract Balances

(a) Receivables

(₹ in crore)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Opening Balance	1224.13	2435.96
Addition/(deduction) during the year	(432.36)	(1211.83)
Closing Balance	791.77	1224.13

(b) Contract Assets

Company recognises contract assets when it satisfies its obligation by transferring the goods or services to the customer and right to receive the consideration is established which is subject to some conditions to be fulfilled by the company in future before receipt of consideration amount. Being a trading company performance obligation of the company is satisfied upon transferring a promised goods or service to its customers and there is no obligation on the part of the company which remains unexecuted.

(c) Contract Liabilities

Upon execution of contract with the customers, certain amount in the form of EMD, Security Deposit, Margin Money, advance for payment of custom duty etc. received from the customers which is shown as advance received from customers under the heading "Other Financial Liabilities" and "Other Liabilities"

(₹ in crore)

Particulars	For the year ended March 31, 2022	For the year ended March 31, 2021
Opening Balance	462.26	212.24
Add: Addition during the year	26.41	329.36
Less: Deduction (Refunds/adjustments)	108.40	24.25
Less: Recognised as revenue during the year forming part of opening balance	15.28	55.09
Closing Balance	364.98	462.26

During the year company has recognized revenue of ₹ Nil crore (P.Y. ₹ Nil crore) from the performance obligations satisfied in earlier periods by raising debit/credit notes to its customers.

The company has made the adjustment of ₹ Nil crore (P.Y. ₹ Nil Crore) in the revenue of ₹ Nil crore (P.Y. ₹ Nil crore) recognized during the year on account of discounts, rebates, refunds, credits, price concessions, incentives performance bonuses etc. as against the contracted revenue of ₹ Nil crore (P.Y. ₹ Nil crore).

(d) Practical expedients

During the year company has entered into sales contracts with its customers where some of the part is yet to be executed, same has not been disclosed as per practical expedient as the duration of the contract is less than one year or right to receive the consideration established on completion of the performance by the company.

B. Significant judgements in the application of this standard

(i) Revenue is recognized by the company when the company satisfies a performance obligation by transferring a promised good or service to its customers. Asset/goods/services are considered to be transferred when the customer obtains control of those asset/goods/services.

(ii) The company considers the terms of the contract and its customary business practices to determine the transaction price. The transaction price is the amount of consideration to which an entity expects to be entitled in exchange for transferring promised goods or services to a customer, excluding amounts collected on behalf of third parties (for example, GST etc.).

(iii) The consideration promised in a contract with a customer may include fixed amounts, variable amounts, or both. Any further adjustment will be made by raising debit/credit notes on the customer. While determining the transaction price effects of variable consideration, constraining estimates of variable consideration, the existence of a significant financing component in the contract, non-cash consideration and consideration payable to a customer is also considered.



(iv) Certain adjustments have been made during the year in contract value which is not significant keeping in view the amount involved.

C. Assets Recognised from costs to obtain or fulfill a contract with a customer

Being a trading company, costs incurred by the company are fixed in nature with no significant incremental cost to obtain or fulfill a contract with a customer and same is charged to profit and loss as a practical expedient.

49. Title deeds of Immovable Property not held in the name of the Company:

(₹ in crore)

Relevant line item in the Balance Sheet	Description of item of property	Gross carrying value	Title deeds held in the name of	Whether title deed holder is a promoter, director or relative of promoter/director or Employee of promoter/director	Property Held since Which date/Allotment Date	Reason for not being held in the name of the company
PPE	Land	1.04	Scope, New Delhi	-	13.12.2000	Scope is yet to sign lease agreement with L&DO
PPE	Building	5.74	Scope, New Delhi	-	13.12.2000	Scope is yet to sign lease agreement with L&DO

50. Financial Ratios:

Particulars	Numerator	Denominator	Ratio As at March 31, 2022	Ratio As at March 31, 2021
Current Ratio (in times)	Current Assets	Current Liabilities	0.88	0.88
Debt-Equity Ratio (in times) ¹	Total Debt	Shareholders Equity	(17.70)	24.24
Debt Service Coverage Ratio (in times) ²	Earnings available for debt service	Debt Service	(0.23)	(2.88)
Return on Equity Ratio (in %)	Net Profits after taxes	Average Shareholder's Equity	10.85	(1.61)
Trade payables turnover ratio (in times) ³	Net Credit Purchases	Average Trade Payables	13.91	28.63
Net profit ratio (in %)	Net Profit	Net Sales	(0.02)	(0.03)
Return on Capital employed (in %) ²	Earning before interest and taxes	Capital Employed	0.13	(0.36)
Net capital turnover ratio (in times) ⁴	Net Sales	Working Capital	(19.96)	(45.31)
Trade Receivables turnover ratio (in times)	Net Credit Sales	Avg. Accounts Receivable	18.19	20.81
Return on investment (in %)	Income from Investments	Time weighted average investment	0.72	5.26
Inventory turnover ratio (in times)	Cost of goods sold OR sales	Average Inventory	298.01	227.62

- 1 Due accrual to interest related to borrowings.
- 2 Due recognition of interest on trade related advance to NINL amounting to ₹ 547.87 crores during the year.
- 3 Due to decrease in purchase during the year.
- 4 Due to decrease in sale during the year.

51. Other Statutory Information-

- a) The Company do not have any Benami property, where any proceeding has been initiated or pending against the Company for holding any Benami property.
- b) The Company do not have any transactions with companies struck off
- c) The Company do not have any charges or satisfaction which is yet to be registered with ROC beyond the statutory period
- d) The Company have not traded or invested in Crypto currency or Virtual Currency during the financial year
- e) The Company have not advanced or loaned or invested funds to any other person(s) or entity(ies), including foreign entities (Intermediaries) with the understanding that the Intermediary shall:
 - Directly or indirectly lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the company (Ultimate Beneficiaries) or
 - Provide any guarantee, security or the like to or on behalf of the Ultimate Beneficiaries.
- f) The Company have not received any fund from any person(s) or entity(ies), including foreign entities (Funding Party) with the understanding (whether recorded in writing or otherwise) that the Company shall:
 - Directly or indirectly lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the Funding Party (Ultimate Beneficiaries) or
 - Provide any guarantee, security or the like on behalf of the Ultimate Beneficiaries
- g) The Company do not have any transaction which is not recorded in the books of accounts that has been surrendered or disclosed as income during the year in the tax assessments under the Income Tax Act, 1961 (such as, search or survey or any other relevant provisions of the Income Tax Act, 1961

- h) The company is not in contravention with the number of layers prescribed under section 2(87) of the Act
- i) The Company has not entered into any Scheme of Arrangements that has been approved by the Competent Authority in terms of sections 230 to 237 of the Act
- j) The company has not been declared wilful defaulter by any bank or financial institution or other lender
52. The accounts of certain trade receivables, trade payables, short and long term loans and advances, other non-current and current Assets are subject to confirmation / reconciliation and adjustment, if any. The Management does not expect any material difference affecting the current year's financial statements.
In the opinion of the management, the assets other than property plant and equipment, intangible assets and non-current investments are expected to realize at the amount at which they are stated, if realized in the ordinary course of business and provision for all known liabilities have been adequately made in the books of accounts.
53. Whole time Directors are allowed usage of staff cars for private use up to 1,000 km per month on payment of ` 2000 per month in accordance with guidelines issued by Department of Public Enterprise (GOI).
54. Accounting policies and notes attached form an integral part of the financial statements.\
55. Amount in the financial statements are presented in ` crore (upto two decimals) except for per share data and as otherwise stated. Certain small amounts may not appear in financial statements due to rounding off in ` in crore. Previous year's figures have been regrouped/rearranged wherever considered necessary.
56. Statement containing salient features of the financial statements of Subsidiaries/Associates companies/ Joint Ventures pursuant to Section 129 (3) of the Companies Act, 2013 in prescribed form AOC-I is attached at Annexure-A.
- 57. Approval of financial statements**
The financial statements were approved by the board of directors and authorised for issue on 08.07.2022.
As per our report of even date attached

As per our report of even date attached

For and on behalf of Board of Directors

For M. L. Puri & Co.
Chartered Accountants
F.R. No.: 00002312N

(CA. R C Gupta)
Partner
M. No. 095584

(G. Anandanarayanan)
Company Secretary
ACS-13691

(B.N. Dash)
Chief General Manager(F&A)

(Kapil Kumar Gupta)
Director (F) & CFO
DIN:08751137

Date: 08.07.2022
Place: New Delhi

(J Ravi Shanker)
Director
DIN: 06961483

(Vibhu Nayar)
Chairman and Managing Director
DIN: 03590141



AOC-I		
Statement containing salient features of the financial statements of Subsidiaries / Associate Companies/ Joint Ventures		
(Pursuant to Section 129 (3) of the Companies Act, 2013)		
Part "A": Subsidiaries		
		(₹ In Crores)
1	Sl. No.	1
2	Name of the Subsidiary	MMTC Transnational Pte Ltd.,
3	Reporting period for the subsidiary concerned,if different from the holding company's reporting period	N.A.
4	Reporting currency and Exchange rate as on the last date of the relevant Financial year in the case of foreign subsidiaries.	US Dollars, Exchange Rate ₹ 74.5208 (Average Rate)
5	Share capital	3.14
6	Reserves & surplus	43.66
7	Total assets	408.71
8	Total Liabilities	361.91
9	Investments	-
10	Turnover	3,403.87
11	Profit before taxation	6.02
12	Provision for taxation	0.93
13	Profit after taxation	5.09
14	Proposed Dividend	NIL
15	% of shareholding	100
a)	Names of subsidiaries which are yet to commence operations	NIL
b)	Names of subsidiaries which have been liquidated or sold during the year	NIL

AOC-I Part "B": Associates and Joint Ventures					
Name of Associates/Joint Ventures	(₹ In Crores)				
	Neelachal Ispat Nigam Limited	Free Trade Warehousing Pvt. Ltd.	MMTC Pamp India Pvt. Ltd.	Sical Iron Ore Terminal Ltd.	MMTC Gitanjali Ltd.
1. Latest audited Balance Sheet Date	31.03.2021*	31.03.2021	31.3.2022	31.03.2021	31.03.2017**
2. Shares of Associate/Joint Ventures held by the company at the year end					
Number	368762744	5000	17446000	33800000	2987400
Amount of Investment in Associates/Joint Venture	459.11	0.01	17.45	33.80	2.99
Extend of Holding %	49.78%	50%	26%	26%	26%
3. Description of how there is significant influence	Equity & Management Control	Equity	Equity	Equity	Equity
4. Reason why the associate/joint venture is not consolidated	N.A.	N.A.	N.A.	N.A.	Note (1)
5. Networth attributable to Shareholding as per latest audited Balance Sheet	(1,736.04)	(19.68)	91.41	33.78	1.82
6. Profit / (Loss) for the year					
i. Considered in Consolidation	-	-	11.55	-	-
ii. Not Considered in Consolidation	-	-	-	-	-
a) Names of associates or joint ventures which are yet to commence operations.					NIL
b) Names of associates or joint ventures which have been liquidated or sold during the year					NIL

* The financial statements are not received from Joint venture company for the year ended 31.03.2022. Latest audited Balance sheet for the JV company is for the year ended 31.03.2021. Details are given at Note no. 41.

** The financial statements are not received from Joint venture company for the year ended 31.03.2022. Latest audited Balance sheet for the JV company is for the year ended 31.03.2017. Details are given at Note no. 41.



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SHARAD

Additional Information as per Part -III - General Instructions for preparation of Consolidated Financial Statements									
Sl. No.	Name of the entity	Net Assets, i.e., total assets minus total liabilities		Share in profit or loss		Share in other comprehensive income		Share in total comprehensive income	
		As % of consolidated net assets	Amount (in Crores)	As % of consolidated profit or loss	Amount (in Crores)	As % of consolidated other comprehensive income	Amount (in Crores)	As % of total comprehensive income	Amount (in Crores)
Parent									
	MMTC Limited	(130.60)	193.40	106.38	(279.11)	88.45	12.87	107.43	(266.25)
Subsidiaries-Foreign									
1	MMTC Transnational Pte Ltd., Singapore	(29.47)	43.65	(1.94)	5.09	12.20	1.78	(2.77)	6.86
2	Non-controlling Interest	-	-	-	-	-	-	-	-
Joint Ventures-Indian (investment as per equity method)									
1	Free Trade Warehousing Pvt. Ltd.	-	-	-	-	-	-	-	-
2	MMTC Pamp India Pvt. Ltd.	(49.95)	73.97	(4.44)	11.65	(0.66)	(0.10)	(4.66)	11.55
3	Sical Iron Ore Terminal Ltd.	-	-	-	-	-	-	-	-
4	Neelachal Ispat Nigam Limited	310.02	(459.11)	-	-	-	-	-	-
5	MMTC Gitanjali Ltd.	-	-	-	-	-	-	-	-
	Total	100.00	(148.09)	100.00	(262.38)	100.00	14.55	100.00	(247.83)



AUDITORS

Office of the Comptroller & Auditor General of India vide their letter No. CA. V/COY/CENTRAL GOVERNMENT, MMTC (10) / 934 dated 25th August, 2021 have communicated the appointment of Auditors of the company under section 139 of the Companies Act, 2013 for the financial year 2021-22. The details are given below:-

Statutory Auditor

Region

M L Puri & Co.

- RO Delhi including SROs

New Delhi

- CO, New Delhi (Including foreign offices)

Office of Mica Division Consolidation and merger of all branches

Branch Auditors

NRSM & Associates.

- Bhubneshwar Regional Office including Sub-Offices/
distribution centers

Cuttack

Bathiya & Associates LLP.

- Mumbai Regional Office including Sub-Offices/
distribution centers

Mumbai

Sharad & Associates

- Hyderabad Regional Office including Sub-Offices/
distribution centers

Hyderabad

B Thiagarajan & Co.

- Chennai Regional Office including Sub-Offices/
distribution centers

Chennai

- MICA Division at Gudur

Sarma & Rao

- Visakhapatnam Regional Office including Sub-Offices/
distribution centers

Visakhapatnam

MMTC OFFICES

CORPORATE OFFICE

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New Delhi - 110 003

Tel: 91-11-24362200; Email: mmtc@mmtclimited.com

Website: www.mmtclimited.com

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SOUTH ZONE	CHENNAI Essar House, 6, Espalande, Chennai -600108 (Tamilnadu) Tel : 044-25341942, 25341938; Fax : 044-25340544, 25340317 Email : head_chennai@mmtclimited.com SROs/FOs: Bengaluru, Banihatti
	VIZAG MMTC Bhawan, Port Area, P. B. No. 132, Vishakhapatnam-530035 (Andhra Pradesh) Tel : PBX : 0891-2562356, 2562771; Fax: 0891-2562611 Email : mmtcvizag@mmtclimited.com
	HYDERABAD 9-1-76 to 77/1/B, 3rd Floor, S.D. Road, Secunderabad-500003 Tel : 040-27804033; Fax : 040-27804038, 27725401 Email: mmtchyd@mmtclimited.com
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WEST ZONE	MUMBAI MMTC House, C-22,E-Block, Bandra Kurla Complex, Bandra East, Mumbai-400 051 Tel : 022-26572437,26594100, 26573193, 61214500; Fax : 022-26572541, 26572807 Email : head_mumbai@mmtclimited.com , mmtcmumbai@mmtclimited.com SROs/FOs: Ahmedabad
PROMOTED	Neelchal Ispat Nigam Ltd, 1st Floor of Annexe, IPICOL House Project Janpath, Bhubaneswar-751022 Tel : 0674-2543231; Fax : 0674-2541763
FOREIGN	SINGAPORE Offices MMTC Transnational Pte Ltd. 3 Raffles Place, #08-01, Bharat Building Singapore - 048617 Tel: (65) 65385313; Fax: (65) 65385316; Email : info@mtpl.com.sg



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