

**CODE OF CORPORATE DISCLOSURE PRACTICE FOR PREVENTION OF INSIDER TRADING OF  
MACHINO PLASTICS LIMITED**

**FORMS**

**Initial Disclosure**

*Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992  
[Regulation 13(1) and (6)]*

**Regulation 13(1) - Details of acquisition of person who holds more than 5% shares or voting rights in the company**

<i>Name, PAN No. &amp; address of shareholder with telephone number</i>	<i>Shareholding prior to acquisition</i>	<i>No. and percent age of shares/ voting rights acquired</i>	<i>Date of receipt of allotment/ advice. Date of acquisition (specify</i>	<i>Date of intimation to Company</i>	<i>Mode of acquisition (market purchase/ public/rights/ preferential offer etc.)</i>	<i>Shareholding subsequent to acquisition</i>	<i>Trading member through whom the trade was executed with SEBI Registration No. of the TM</i>	<i>Exchange on which the trade was executed</i>	<i>Buy quantity</i>	<i>Buy Value</i>

Date : \_\_\_\_\_

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Name & Designation)

**INITIAL DISCLOSURE by new/existing Directors/Officer /Designated Employees (DE)**

**Regulation 13(2) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations,1992**

Name, PAN No.& Address of Director/Officer/DE	Date of assuming office of Director / Officer/ DE	No. & % of shares/voting rights held at the time of becoming Director / Officer/ DE	Date of intimation to company	Mode of acquisition (market purchase /public/ rights / preferential offer etc.)	Trading Member (TM)  through whom the trade was executed with SEBI – Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value

Date : \_\_\_\_\_

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Name & Designation)

Note : This format shall be applicable, with suitable modifications, to disclosures for positions taken in derivatives also.

### Continual Disclosure

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992  
[Regulation 13(3) and (6)]

#### Regulation 13(3) — Details of change in shareholding of 5% or more shares in the company

Name, PAN No. & address of shareholders	Shareholding prior to acquisition/ sale	No. & % of shares / voting rights acquired/ sold	Receipt of allotment advice/ acquisition of shares/ sale of shares specify	Date of intimation to company	Mode of acquisition (market purchase/ public/ rights/ preferential offer etc.)	No. & % of shares/ voting rights post-acquisition/ sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell value

Date : \_\_\_\_\_

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Name & Designation)

**ANNUAL DISCLOSURE OF SECURITIES HOLDINGS  
of Directors / Officers / Designated Employees**

Mr. \_\_\_\_\_, Compliance Officer,  
Machino Plastics Limited

Dear Sir,

I, \_\_\_\_\_, hereby declare that securities held by me and the securities held by my Dependant (as defined in the Code) in the Company as on 31<sup>st</sup> March, \_\_\_\_\_ and the transactions during the period 1<sup>st</sup> April \_\_\_\_\_ to 31<sup>st</sup> March \_\_\_\_\_ are as per details furnished below :

Name	Relation	Type of Security	Securities held as on 1st April, _____		Securities Acquired during the period*		Securities Sold during the period*			Balance holding as on 31st March _____	Folio No./ DP ID / Client ID No.
			No.	Date of disclosure to the Co.	No.	Date of disclosure to the Co.	No.	Date of disclosure to the Co.	Date of pre clearance		

I declare that minimum holding period stipulated in the Code for Prevention of Insider Trading with respect to the securities sold, has been complied with and that the information furnished herein is complete and correct.

\* including shares acquired / sold under cashless exercise of stock options.

Date : \_\_\_\_\_  
Signature : \_\_\_\_\_

Name & Designation: \_\_\_\_\_

**Statement of holding of securities at the time of Pre-clearance**

To,  
Mr. \_\_\_\_\_, Compliance Officer,  
Machino Plastics Limited

I, \_\_\_\_\_, hereby declare that the details of securities held by me and the securities held by my Dependants in the Company as on this date are furnished below:

<b>Name</b>	<b>Relation</b>	<b>Folio No. / DP ID / Client ID No. / ESOP*</b>	<b>Type of Security</b>	<b>No. of Securities</b>

\*Where the securities proposed to be sold are pursuant to cashless exercise of stock options, please mention "ESOP Entitlement" in this column.

Date : \_\_\_\_\_

Signature \_\_\_\_\_

**Application for Pre-clearance for dealing In Company's Securities above threshold limit  
(refer para no. 3.3-2 of the Code for Prevention of Insider Trading)**

From :

Date :

Name :

Designation :

To :

**Mr. \_\_\_\_\_, Compliance Officer**

With reference to the Code for Prevention of Insider Trading ("the Code") of the Company, I seek your approval to subscribe to / agree to subscribe to / purchase\* / sell\* / deal as an agent / principal in \_\_\_\_\_ (nos) of \_\_\_\_\_ (description of security) of the Company.

The statement of securities of the Company held as on \_\_\_\_\_ and my Undertaking in the prescribed format are enclosed for your perusal in this connection.

\* I declare that I have not entered into an opposite transaction of sale / purchase during the 6 months preceding this application.

I further declare that the minimum holding period stipulated in the Code with respect to the securities proposed to be sold has been complied with.

Signature: \_\_\_\_\_

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PRE-CLEARANCE ORDER

Date :

This is to inform you that your request for dealing in \_\_\_\_\_ (nos) of \_\_\_\_\_ (description of security) of the Company as mentioned in your above mentioned application is approved. Please note that the said transaction must be completed on or before \_\_\_\_\_ i.e. within 7 days from today.

For Machino Plastics Limited  
Compliance Officer

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CONFIRMATION OF DEAL

Date :

To: The Compliance Officer  
Machino Plastics Limited

I confirm that the security dealing for which approval was granted on \_\_\_\_\_ was completed on \_\_\_\_\_

\_\_\_\_\_ by purchasing / selling \_\_\_\_\_ (nos) of \_\_\_\_\_ (description of security) of the Company.

**UNDERTAKING TO BE SUBMITTED ALONGWITH APPLICATION FOR PRE-CLEARANCE  
(refer para no. 3.3-3 of the Code for Prevention of Insider Trading)**

To,  
Mr. \_\_\_\_\_, Compliance Officer,  
Machino Plastics Limited

I, \_\_\_\_\_ (name and designation), am desirous of dealing in \_\_\_\_\_ (nos.) of \_\_\_\_\_ (description of security) of the Company as mentioned my application dated \_\_\_\_\_ for pre-clearance of the transaction.

As required by the **Code for Prevention of Insider Trading (“the Code”)** of the Company, I hereby state as follows :

- a) I have no access to nor do I have any information that could be construed as “Price Sensitive Information” as defined in the Code upto the time of signing this undertaking;
- b) In the event that I have access to or received any information that could be construed as “Price Sensitive Information” as defined in the Code, after the signing of this Undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same in writing and shall completely refrain from dealing in the securities of the Company until such information becomes public;
- c) I have not contravened the provisions of the Code in force as of date;
- d) I have made full and true disclosure in the above matter.

Date:

Signature:

**Application for Waiver of Restriction on undertaking Opposite Transactions or on Maintaining Minimum Holding Period**

Date :

To,  
Mr. \_\_\_\_\_, Compliance Officer,  
Machino Plastics Limited

Dear Sir,

I request you to grant me waiver from:

- a) the restriction of undertaking an 'opposite transaction' of sale / purchase of the securities of MPL;
- b) the minimum holding period of 30 days;

as required under clause VIII of the **Code for Prevention of Insider Trading** with respect to the following securities of the Company held by me:

Name	Relation	Folio No. / DP ID / Client ID No.  / ESOP*	Type of Security	No. of Securities	Date of Acqn.

The reasons for seeking this waiver are given below:

[ mention reasons here ]

Thanking you,

Yours faithfully,



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(Name)  
(Designation)  
(Department)