



Machino Plastics Limited

Registered Office & Plant:

3, Maruti J.V. Complex, Delhi-Gurugram Road, Tel: 0124-2341218, 2340806
Haryana – 122 015, India. Fax: 0124-2340692

CIN: L25209HR2003PLC035034

Email: admin@machino.com

Website: www.machino.com

30th May, 2024

The BSE Ltd.
Phiroze Jeejebhoy Towers
Dalal Street,
Mumbai – 400001
corp.relations@bseindia.com
Scrip Code. 523248

Sub: Annual Secretarial Compliance Report for the financial year ended on 31st March, 2024

Dear Sir/Madam,

Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 please find enclosed herewith the Annual Secretarial Compliance Report for the financial year ended on 31st March, 2024.

This is for your kind information and record.

Thanking You

Yours faithfully
For **Machino Plastics Limited**

Reetika
Pant

Digitally signed by
Reetika Pant
Date: 2024.05.30
11:18:28 +05'30'

Reetika Pant
Company Secretary

A K & ASSOCIATES

B-14, Vasant Kunj Enclave, New Delhi 110070

Ph-9873676963, 011- 61115152

Email: -atimakhanna@gmail.com



SECRETARIAL COMPLIANCE REPORT OF MACHINO PLASTICS LIMITED
FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2024

To,
The Board of Directors
Machino Plastics Limited
Plot No. 03 – Maruti Joint Venture Complex,
Udyog Vihar, Phase IV
Gurgaon Haryana-122015

Dear Sir,

We **A.K & ASSOCIATES** have examined:

- a) All the documents and records made available to us and explanation provided by Machino Plastics Limited (“the listed entity”),
 - b) The filings/ submissions made by the listed entity to the stock exchanges,
 - c) Website of the listed entity,
 - d) Any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31st March, 2024 (“Review Period”) in respect of compliance with the provisions of:
 - a. The Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
 - b. The Securities Contracts (Regulation) Act, 1956 (“SCRA”), rules made there under and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India (“SEBI”)
- **The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, includes:-**
- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
 - b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;

- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- h) Securities and Exchange Board of India (Delisting of Equity Shares) (Amendment) Regulations, 2016;
- i) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009;
- j) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- k) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;and circulars/ guidelines issued thereunder;

And based on the above examination, I/We hereby report that, during the Review Period:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder, except in respect of matters specified below:

Sr. No.	Compliance Requirement (Regulations / circulars/ guidelines including specific clause)	Regulation /Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations /Remarks of the Practicing Company Secretary (PCS)	Management Response	Remark
	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.



(d) The listed entity has taken the following actions to comply with the qualification/observations made in the Secretarial Compliance Report of previous year:

Sr. No.	Compliance Requirement (Regulations / circulars/ guidelines including specific clause)	Regulation /Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations /Remarks of the Practising Company Secretary (PCS)	Management Response	Remark
	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.

➤ I/we hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No	Particulars	Compliance Status (Yes/ No/NA)	Observations /Remarks by PCS*
1.	<p>Secretarial Standards:</p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.</p>	Yes	None
2.	<p>Adoption and timely updation of the Policies:</p> <ul style="list-style-type: none"> All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI 	Yes	None



<p>3.</p>	<p>Maintenance and disclosures on Website:</p> <ul style="list-style-type: none"> • The Listed entity is maintaining a functional website • Timely dissemination of the documents/ information under a separate section on the website • Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/section of the website 	<p>Yes</p>	<p>None</p>
<p>4.</p>	<p>Disqualification of Director:</p> <p>None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	<p>Yes</p>	<p>None</p>
<p>5.</p>	<p>Details related to Subsidiaries of listed entities have been examined w.r.t.:</p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Disclosure requirement of material as well as other subsidiaries</p>	<p>NA</p>	<p>None</p>
<p>6.</p>	<p>Preservation of Documents:</p> <p>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.</p>	<p>Yes</p>	<p>None</p>



7.	<p>Performance Evaluation:</p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.</p>	Yes	None
8.	<p>Related Party Transactions:</p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or</p> <p>(b) The listed entity has provided detailed reasons along with confirmation whether the transaction were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.</p>	Yes	None
9.	<p>Disclosure of events or information:</p> <p>The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.</p>	Yes	None
10.	<p>Prohibition of Insider Trading:</p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	Yes	None



<p>11.</p>	<p>Actions taken by SEBI or Stock Exchange(s), if any:</p> <p>Action(s) has been taken against the listed entity by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/guidelines issued thereunder due to non-submission of the financial results within the period prescribed under this regulation for the Quarter ended September 2023 as per Regulation 33 of SEBI (LODR) Regulation, 2015.</p>	<p>Yes (Late Submitted)</p>	<p>Yes, action has been taken by SEBI and stock exchange during the review period including under the standard operating procedure issued by SEBI through various circulars</p> <p>BSE Limited imposed fine amounting Rs. 35,400 on Company for non-compliance as per Regulation 33 of SEBI (LODR) Regulation,2015</p>
<p>12.</p>	<p>Resignation of statutory auditors from the listed entity or its material subsidiaries:</p> <p>In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.</p>	<p>N.A.</p>	<p>None</p>
<p>13.</p>	<p>Additional non-compliances, if any:</p> <p>a. The Company has received a notice under Section 206(4) of The Companies Act, 2013 from Registrar of Companies (ROC), In the matter of Inquiry under Section 206 of The Companies Act, 2013.</p>	<p>–</p>	<p>The Audit Committee took on priority the ROC matter and reply has been sent to the ROC.</p>



ASSUMPTIONS & LIMITATION OF SCOPE AND REVIEW:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

FOR A K & ASSOCIATES



ATIMA KHANNA
(Practicing Company Secretary)
C.P. No. 10296
M. No. F9216
P.R No. 1102/2021
UDIN No-F009216F000497264

Place: New Delhi
Date: 30.05.2024