



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

The BSE Ltd.
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai-400001
corp.relations@bseindia.com
Scrip Code No: 523248

Date: 13th October, 2023

Subject Disclosure under Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

Dear Sir,

We have received an order on 12th October, 2023 under Section 206(4) of the Companies Act, 2013 dated 9th October, 2023, copy attached initiating inquiry against the Company from Ministry of Corporate Affairs. We will take appropriate actions and will provide information, details and supporting documents to the concerned authority as may be necessary.

The detailed disclosures as required under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 is enclosed.

Please take the same in your record.

Thanking You,

Yours faithfully
For Machino Plastics Limited

Aditya Jindal
Chairman Cum Managing Director



Machino Plastics Limited

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Disclosures under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

i.	Name of the authority	Ministry of Corporate Affairs
ii.	Nature and details of the action(s) taken, initiated or order(s) passed	Inquiry under Section 206(4) of the Companies Act, 2013.
iii.	Date of receipt of direction or order, including any ad-interim or interim orders, or any other communication from the authority	12 th October 2023.
iv.	Details of the violation(s)/contravention(s) committed or alleged to be committed;	Section 128(1), Section 129, Section 134(5), Section 143(3)(e), Section 177, Section 197 and Section 89.
v.	Impact on financial, operation or other activities of the listed entity, quantifiable in monetary terms to the extent possible.	Not ascertainable as of now.

Thanking You,

Yours faithfully
For Machino Plastics Limited


Aditya Jindal
Chairman Cum Managing Director

Fax : 011 -26235702
Website : www.mca.gov.in
E-Mail : roc.delhi@mca.gov.in



(011)26235703
(011)26235704
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भारत सरकार
कार्पोरेट कार्य मंत्रालय
कंपनी पंजीयक कार्यालय, दिल्ली एवं हरियाणा
चतुर्थ तल, आई.एफ.सी.आई. टॉवर, 61 नेहरू
प्लेस,
नई दिल्ली - 110019

GOVERNMENT OF INDIA
MINISTRY OF CORPORATE AFFAIRS,
OFFICE OF REGISTRAR OF
COMPANIES,
NCT OF DELHI & HARYANA
4TH FLOOR, IFCI TOWER, 61, NEHRU
PLACE, NEW DELHI -110019

No. ROC(Delhi)/Inquiry/2023/Machino Plastic/3803

Date: 9-10-2023

**ORDER UNDER SECTION 206(4) OF THE COMPANIES ACT, 2013
IN THE MATTER OF INQUIRY UNDER SECTION 206 OF COMPANIES ACT, 2013
AGAINST MACHINO PLASTICS LIMITED (L25209HR2003PLC035034)
SRN: I00079450**

WHEREAS MACHINO PLASTICS LIMITED (L25209HR2003PLC035034) (hereinafter refer to as "the subject company") is a private limited company incorporated on 21.01.2003, registered with this office, Registrar of Companies (ROC) NCT of Delhi & Haryana, having registered office at **Plot No. 3, Maruti J . V. Complex, Udyog Vihar, Phase - IV, Gurugram, 122015 (Haryana).**

An Inquiry under Section 206(4) of the Companies Act, 2013 has been ordered against the subject company by the Ministry of Corporate Affairs (hereinafter refer to as "the Ministry") vide letter no. F. No. 7/85/2022/DGCoA-MCA dated 26.05.2022. Whereas, on perusal of reference received from the Ministry, the records and other related documents filed by the company with this office/MCA21 from time to time, the undersigned is of the opinion that the company has not been carrying its business, operations in compliance with the provisions of the Companies Act, 2013 and relevant rules thereof, and hence, some information/explanation is necessary to examine the matter.

You are hereby ordered to submit the following documents/information/details **within 15 days hereof, 3 physical copies & 1 soft copy** (through email at the above given mail address, or if the total size is greater than 10 MB, then in a CD-ROM or Pen Drive). All the documents supporting your reply should be duly attested/certified by the director of the company

who is authorized by a valid Board Resolution to do so, and the said documents/annexures must be properly indexed, flagged/tagged and numbered.

1. It is observed from the secretarial auditor's report dated 22.06.2021 on financial statement as on 31.03.2021 that Contingent liabilities not provided for Demand under the Central Excise Act of Rs. 58,211,882/- (Previous year Rs. 58,211,882). In view of the above financial statement, the Company is not giving a true and fair view of the state of the affairs of the company pursuant to the requirement of section 128 (1) of the Companies Act, 2013. Hence, the Company and its directors have violated the provision of section 128 (1) of the Companies Act, 2013. Please offer your comments along with the documentary evidence.
2. It is observed from the secretarial auditor's report dated 22.06.2021 on financial statement as on 31.03.2021 that Contingent liabilities not provided for Demand under the Central Excise Act of Rs. 58,211,882/- (Previous year Rs. 58,211,882). Whereas as per provision of section 129 of the Companies Act, 2013 read with Schedule - III, Contingent liabilities shall be classified as Claims against the company even if not acknowledged as debt. Hence, the Company and its directors have violated the provision of section 129 of the Companies Act, 2013 read with Schedule - III. Further, Whereas as per conditions mentioned for contingent liabilities in IND - AS 37, a provision shall be recognized when an entity has a present obligation (legal or constructive) as a result of a past event or it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation; and a reliable estimate can be made of the amount of the obligation. It is stated that contingent liability arises in the extremely rare case where there is a liability that cannot be recognized because it cannot be measured reliably. Disclosures are required for the contingent liability. Hence, the Company and its directors have violated the provision of section 129 of the Companies Act, 2013 read with IND - AS - 37. Please offer your comments along with the documentary evidence.
3. It is observed from the financial statement as on 31.03.2021 that the Company has violated the provision of section 129 of the Companies Act, 2013 read with IND - AS - 37 (As mentioned in para 2 above). But in the Directors Responsibility Report of the Company any explanation has not been given pursuant to requirement of section 134 (5) of the Companies Act, 2013. Hence, the directors of the Company have

violated the provision of section 134 (5) of the Companies Act, 2013. Please explain with the requisite documents.

4. It is observed from the financial statement as on 31.03.2021 that the Company has violated the provision of section 129 of the Companies Act, 2013 read with IND - AS - 37 (As mentioned in para 2 above). But statutory auditor of the Company has failed to qualify his report on the aforesaid contravention of Accounting Standard - 18 read with section 129 of the Companies Act, 2013. Hence, statutory auditor of the Company has violated the provision of section 143 (3) (e) of the Companies Act, 2013. Please explain with the requisite documents.
5. It is observed from the financial statement on 31.03.2021 that the Company has not disclosed the composition of audit committee. Whereas as per requirement of section 177 (8) of the Companies Act, 2013 The Board's report under sub-section (3) of section 134 shall disclose the composition of an Audit Committee and where the Board had not accepted any recommendation of the Audit Committee, the same shall be disclosed in such report along with the reasons therefor. Hence, the directors of the Company have violated the provision of section 177 of the Companies Act, 2013. Please explain with the requisite documents.
6. It is observed from the financial statement on 31.03.2021 that the Company has paid remuneration to its KMPs more than the limit specified in section 197 of the Companies Act, 2013 read with schedule - III. Please furnish the special resolution alongwith the minutes of audit committee in which the said remuneration was approved.
7. Furnish the measurement adopted by the organization for transfer of stock within inter unit transfer and determining provisions for using transfer price for each stock transfer in period wise along with management approval for said pricing & transfers.
8. As per the Complaint, it was observed that the company has breach the terms of JV dated 14.05.1987 with regard to diluting the nature of shareholding of the promoting company i.e., complainant company. Hence furnish the background related to formation of the subject company and the role of complainant company in promoting the business of the subject company, and change of promoters' with regard to separation of role of complainant company for which it was incorporated.

9. As per the Complaint, it was observed that the company has appointed a statutory auditor firm in which the relative of the director was the partner. Please explain with the requisite documents.

10. Company has not filed the Significant Beneficial Owner declaration in the case of M/s Maruti Suzuki Limited and M/s Suzuki Motor Corporation pursuant to requirement of section 89 of the Companies Act, 2013. Please explain with the requisite documents.

11. As per the Complaint, during FY 2015-16, the company has booked Rs.1,64,27,504/- for profit & Loss statements in form of Impairment on tangible assets, however impairment on Assets of Rs. 14,69,504/- has been reversed during FY 2018-19. Explain this reversal amount and its impact on the financial position of the company.

12. As per the Complaint, the company has availed excess borrowings of Rs.4208.63 lakhs i.e., availed short-term borrowing of Rs.5601.51 lakhs as against maximum permissible bank finance "MPBF" of Rs.1392.88 Lakhs. Please explain with the requisite documents.

13. Please furnish the details of sundry creditors /receivables written off during last 5 years along with the ledgers thereof.

14. Sales of the company are shown to have decreased by 20% as compared to last year, but the profit of the company is shown to have decreased by a whopping 7441% i.e., whereby reduction in profit from Rs.0.12 Cr to Rs.8.51 Cr. due to this changes, the Gross Profit is shown to have increased exceptionally from 31.58% to 36.28 and Net Profit Ratio has increased from 0.04% to 3.52%. Furnish Explanation.

15. Details of all the accounts held by the company - operational, closed, dormant, frozen, etc. - since incorporation till date in below mentioned format.

Name of Bank/Branch	IFSC	Account No.	Account Type	Current Balance

16. Details of all the related party transactions (Refer Section 2(76) of Companies Act, 2013 to see who all come within the definition of Related Parties) as per section 188 of the Companies Act, 2013, since last 5 years, in below mentioned format:

Fin. Year (FY)	Name of Related Party	Nature of Relation	Total amount of transaction	Nature/Reason for transaction

17. Whether the company received any funds from any foreign body/individual for allotment of shares/subscription and, if so, provide details of transactions and whether proper banking channel was used to receive the amount as per Foreign Exchange Management Act, 1999, compliance with supporting documents. Provide explanation in case of any deviation from the guidelines as prescribed under Companies Act, 2013 read with relevant Rules.
18. Furnish the copy of Income Tax related information (Copy of ITR) filed by the company for all FY since last 5 years duly enclosing copy of intimation letter of Assessment of return processed by Assessing Officer under the relevant provisions of the Income Tax Act, 1961.
19. Details of notices received by the company and/or its directors by any other regulatory/enforcement authorities like RBI, SEBI, Income Tax, GST Department or any other such body, and the status of the matter as on date since incorporation till date.
20. Furnish the authenticated copies of following records/registers maintained by the Company in compliance of the Companies Act, 2013 as under:
- Register of charges
 - Register of Members
 - Register of Fixed Assets
 - Register of Directors
 - Register of Deposit.

- f) Register of complaint from shareholders and provide copies of complaint and reply/ action taken thereon by the Board of Directors for last 5 years.
- g) Minutes books of board meeting, audit committee and general meetings for last 5 years.
- h) Copy of resolutions passed in the Board meetings and AGM/EoGM during last 5 years.
- h) Furnish authenticated copies of bank statements for last three years.

In terms of provision under Section 20 of Companies Act, 2013, this order is hereby being served upon both the company and the Directors of the company, both by registered post/speed post/courier service/by leaving it at its registered office/addresses provided on MCA21, and by means of electronic email. The company is to bring this order to the notice/knowledge of all its Directors, (Present/Past) immediately upon receipt of this order,

Any default, in this regard by the company and/or its officers (even those who were engaged/ employed/associated with the company as directors/officer in default/key managerial personnel at any point of time) shall be liable for prosecution under section 206(7) of Companies Act, 2013, r/w relevant provisions under the Code of Civil Procedure, and this office shall be at liberty to proceed without any further correspondence in the matter.

Banwari
(Banwari Lal Sharma)
ARoC cum Inquiry Officer
NCT of Delhi & Haryana "

To

1	M/s. MACHINO PLASTICS LIMITED CIN: L25209HR2003PLC035034 Plot No-3 Maruti Joint Venture complex, Gurgaon, Haryana Email: sec.legal@machino.com	2	Mr. AJIT YADAV, Director (DIN: 02754863) N-33. Sainik Farms, Lane W 17e, Pushpa Bhawan S.O, South Delhi, South Delhi- 110062, Delhi Email: ajit.yadav.associates@gmail.com
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3	Mr. SANJIV JINDALL, Director (DIN: 00017902) A-401, Near Ambience Lagoon, NH-8, Gurgaon-122001, Haryana Email: sjindall@machino.com	4	Mr. ANUPAM GUPTA, Director (DIN: 00335437) 20, East Park Area Karol Bagh New Delhi-110005, Delhi, India Email: anu65gupta@gmail.com
5	Mr. RAJIV KUMAR SINGH, Director (DIN: 03060652) G-6 Mangalam Home, Module Eleven Abhay Khand-3, Indirapuram Ghaziabad-201010, Uttar Pradesh, Email: rajivsinghfca@gmail.com	6	Mr. Aditya Jindal, MD (DIN: 01717507) A-401, Ambience Apartment, NH-8, Leela Hotel, Gurgaon-122001, Haryana, Email: ajindal@machino.com
7	Mr. SANDEEP GOEL, Director (DIN: 08471700) AM-157, Shalimar Bagh, North West Delhi-110088, Delhi Email: sandeepgoel18@rediffmail.com	8	Mr. RAVINDER HOODA, CFO (PAN: ACCPH4644K) H. No.-416, Ward No.-1, Rishi Colony Jhajjar, Near Bagh Jahanara, Jhajjar-124103, Haryana,
9	Smt. REETIKA PANT, CS (PAN: CMLPP7345G) House No. 753/A, 22 Foot Road, Gali No. 6, Jawahar Colony, N.I.T Faridabad- 121005.	10	Sh. Lalit Goel, KMG S & Associates, Basement, 18, National Park, Lajpat Nagar-IV, New Delhi-110024 requested to offer comments w.r.t. para 6 of this order.

