

# **MID INDIA INDUSTRIES LIMITED**

CIN: L17124MP1991PLC006324

Registered Office: Textile Mill Area, Station Road, Mandsaur M.P. 458001 IN

Corporate Office: 401, Princess Centre, 6/3, New Palasia, Indore 452003(M.P.)

Tel. 07422-234999; Email id- [csmidindia@gmail.com](mailto:csmidindia@gmail.com), [www.midindiaindustries.com](http://www.midindiaindustries.com)

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**Date: 23<sup>rd</sup> May, 2024**

**To,  
The Secretary  
Corporate Relationship Department  
BSE Limited  
P.J.Tower  
Dalal Street, Mumbai-400001**

**Subject: Submission of Annual Secretarial Compliance Report for the Financial Year ended 31<sup>st</sup> March 2024.**

**Ref: MID INDIA INDUSTRIES LIMITED (BSE Security Code: 500277; ISIN INE401C01018)**

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (LODR) Regulations read with the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019 read with BSE Notice No. 20230316-14 dated 16<sup>th</sup> March, 2023 and Notice No. 20230410-41 dated 10<sup>th</sup> April, 2023, please find enclosed herewith the Annual Secretarial Compliance Report of the Company for the Financial year ended 31<sup>st</sup> March, 2024 issued by L N Joshi and Co., Practicing Company Secretaries.

The Annual Secretarial Compliance Report shall also be filed in the XBRL mode within the stipulated time period.

You are requested to please take on record the above said document for your reference & further needful.

Thanking you,

**FOR MID INDIA INDUSTRIES LIMITED**

Shailendra Kumar Agrawal  
Company Secretary & Compliance Officer  
FCS-12104

Enclosed: Annual Secretarial Compliance Report for the financial year ended 31<sup>st</sup> March, 2024.



**L N JOSHI & CO.**

**PRACTISING COMPANY SECRETARIES**

122, Krishna Business Centre, 11, PU- 4  
Next to Medanta Hospital, Rasoma Square  
Indore -452010 (M.P.)

**L.N. Joshi**

M.Com, LLB (Hons), FCS  
**Insolvency Professional**

Ph.-(0731) 4266708

Cell +91 94250 60308

E-mail-lnjoshics@gmail.com

To,  
The Board of Directors,  
**MID INDIA INDUSTRIES LIMITED**  
CIN: L17124MP1991PLC006324  
**Registered Office:**  
Textile Mill Area, Station Road, Mandsaur (M.P.) 458001

**Sub: Annual Secretarial Compliance Report for the Financial Year 2023-24 under Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.**

Dear Sir/Madam,

I have been engaged by **MID INDIA INDUSTRIES LIMITED** (hereinafter referred to as the 'Company') [CIN: L17124MP1991PLC006324] whose equity shares are listed on BSE Limited, to conduct an audit in terms of Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended and read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

Please find enclosed the Annual Secretarial Compliance Report duly signed by me for your doing further needful.

Kindly acknowledge the same

Place: Indore  
Date: 21<sup>st</sup> May, 2024

For L.N. Joshi & Company  
Company Secretaries

L.N. Joshi  
Proprietor



FCS: 5201, C P No: 4216  
PR Certificate No. 1722/2022  
Unique Code Number: S2002MP836100



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**ANNUAL SECRETARIAL COMPLIANCE REPORT  
OF**

**MID INDIA INDUSTRIES LIMITED  
FOR THE FINANCIAL YEAR ENDED 31<sup>ST</sup> MARCH, 2024**

[Under Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

I, L.N. Joshi, proprietor of L N Joshi and Co., Company Secretaries have examined:

- all the relevant documents and records made available to me and explanation provided by **MID INDIA INDUSTRIES LIMITED** (“the listed entity”),
- the filings/ submissions made by the listed entity to the BSE LIMITED,
- website of the listed entity, i.e. [www.midindiaindustries.com](http://www.midindiaindustries.com)
- any other document/ filing, as may be relevant, which has been relied upon to make this certification,

For the year ended 31<sup>st</sup> March, 2024 (“**Review period**”) in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 (“**SEBI Act**”) and the Regulations, circulars, guidelines issued there under; and
- the Securities Contracts (Regulation) Act, 1956 (“**SCRA**”), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India (“**SEBI**”);

The specific Regulations, whose provisions and the circulars/guidelines issued there under, have been examined, include:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **[Not Applicable as there was no reportable event during the financial year under review]**
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buy-back of Securities) Regulations, 2018; **[Not Applicable as there was no reportable event during the financial year under review];**
- Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **[Not Applicable as there was no reportable event during the financial year under review];**





- f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; [**Not Applicable as there was no reportable event during the financial year under review**]
- g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

and the circulars/ guidelines issued there under; and based on the above examination, I hereby report that, during the review period:

- a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under, 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 (Advisor y/Clarification/ Fine/ Show Cause Notice/ Warning etc.)	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Company Secretary	Management Response	Remarks
None										

- b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No	Observations/ Remarks of the Practicing Company Secretary in the previous reports(PCS)	Observations made in the secretarial compliance report for the year ended	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Details of violation/deviations and actions taken/penalty imposed, if any, on the listed entity.	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
01	The Company is required to obtain the contingency insurance policy in the matter of issuance of duplicate securities.	31.03.2023	Para 5 of SEBI Circular No. SEBI/HO/MIRSD /MIRSD_RTAMB /P/CIR/2022/70 May 25, 2022	No fine/penalty imposed/ action taken, by any authority for such non compliance.	The Company has obtained the contingency insurance policy towards the risk arising out of the requirements relating to issuance of duplicate securities of the company having validity since from 09.02.2024 to 08.02.2025	Complied
02	At least 50% of Non promoters holding shall be held in dematerialized form.	31.03.2021 31.03.2022 and 31.03.2023	SEBI Circular No. CIR/CFD/CMD/13/2015 dated 30th November, 2015	No fine/penalty imposed/ action taken, by any authority for such non compliance.	The Company have requested to members who holds shares in physical form to get dematerialized their shareholding and also inform about the benefits of shares hold in dematerialised form. Further total Non Promoter holding increased from 36.03% to 39.21% from last financial year.	Request letter despatched by the company to the shareholders but still 50% of Non promoters holding not held in dematerialized form



Note: The observations made in the Annual Secretarial Compliance Report for the financial year ended 31<sup>st</sup> March, 2022 were already mentioned in the previous year's report (i.e. report for the financial year ended 31<sup>st</sup> March, 2023) and no action was required to be taken in current year except reported above.

I. I 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
01	<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	
02	<p><b>Adoption and timely up-dation of the Policies:</b></p> <ul style="list-style-type: none"> <li>• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entity</li> <li>• All the policies are in conformity with SEBI Regulations and has been reviewed &amp; timely updated as per the regulations/ circulars/ guidelines issued by SEBI</li> </ul>	Yes	
03	<p><b>Maintenance and disclosures on Website:</b></p> <ul style="list-style-type: none"> <li>• The Listed entity is maintaining a functional website</li> <li>• Timely dissemination of the documents/ information under a separate section on the website</li> <li>• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant</li> </ul>	Yes	



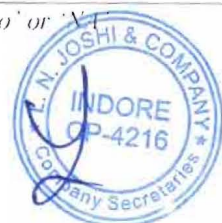
	document(s)/ section of the website		
04	<b>Disqualification of Director:</b>  None of the Director of the listed entity are disqualified under Section 164 of Companies Act, 2013 as confirmed by listed entity	Yes	
05	<b>Details related to Subsidiaries of listed entity have been examined w.r.t.:</b>  (a) Identification of material subsidiary companies  (b) Requirement with respect to disclosure of material as well as other subsidiaries	NA	Company did not have any Subsidiary Company during the year under review
06	<b>Preservation of Documents:</b>  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.	Yes	
07	<b>Performance Evaluation:</b>  The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees on an annual basis as prescribed in SEBI Regulations	Yes	
08	<b>Related Party Transactions:</b>  (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions;  (b) in case no prior approval obtained, the Listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee.	Yes  NA	Please refer point no. 8(a)
09	<b>Disclosure of events or</b>	Yes	





	<p><b>information:</b></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 there under.</p>		
10	<p><b>Prohibition of Insider Trading:</b></p> <p>The listed entity is in compliance with Regulation 3(5) &amp; 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015</p>	Yes	
11	<p><b>Actions taken by SEBI or Stock Exchange, if any:</b></p> <p>No Actions has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued there under.</p>	NA	No actions were taken by SEBI or by the Stock Exchanges during the Review Period including under the Standard Operating Procedures issued by SEBI through various circulars.
12	<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 subsidiaries 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>	NA	There has been no resignation by the Statutory Auditor of the Company during the review period.
13	<p><b>Additional Non-compliances, if any:</b></p> <p>No any additional non-compliance observed for all SEBI regulation / circular / guidance note etc.</p>	No	At-least 50% of Non-Promoters holding shall be held in dematerialized form but still not complied.

\*Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'N/A'



### Assumptions & Limitation of scope and Review:

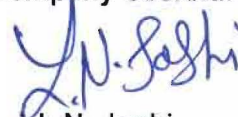
1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) 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.

Place: Indore

Date: 21<sup>st</sup> May, 2024

UDIN: F005201F000414940

For L.N. Joshi & Company  
Company Secretaries

  
L.N. Joshi

Proprietor

FCS: 5201, C P No: 4216

PR Certificate No. 1722/2022

Unique Code Number: S2002MP836100

