



Joshi Sahay & Company

Company Secretaries

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

Email Id: cslnjoshi@gmail.com, Off. No. 0731-4266708/+91-94250-60308

To,
The Board of Directors,
MID INDIA INDUSTRIES LIMITED

CIN: L17124MP1991PLC006324

Registered Office:

Textile Mill Area, Station Road,
Mandsaur (M.P.) 458001

Subject: Annual Secretarial Compliance Report for the Financial Year 2025-26 under Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Dear Sir/Madam,

We 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 8th February, 2019 and SEBI Master Circular No. HO/49/14/ 14(7)2025-CFD-POD2/I/3762/2026 dated January 30, 2026 and to issue the Annual Secretarial Compliance Report thereon.

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

Kindly acknowledge the same.

Date: 13th May, 2026
Place: Indore

For Joshi Sahay and Company
Company Secretaries

L.N. Joshi
Partner



FCS: 5201, CP No: 4216
PR Certificate No. 6873/2025
Unique Code Number: P2025MP322400

**ANNUAL SECRETARIAL COMPLIANCE REPORT
OF
MID INDIA INDUSTRIES LIMITED
FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2026**
[Under Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

I, L.N. Joshi, partner of Joshi Sahay and Company., Company Secretaries have examined:

- a) all the relevant documents and records to the extent made available to us and explanations and representations provided by **MID INDIA INDUSTRIES LIMITED ("the listed entity")**,
- b) the filings/ submissions made by the listed entity to BSE Limited,
- c) website of the listed entity, i.e. www.midindiaindustries.com
- d) any other document/filing, as may be relevant, which has been relied upon to make this certification,

For the financial year ended 31st March, 2026 ("**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 there under; and
- b) 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:

- 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; **[Not Applicable as there was no reportable event during the financial year under review]**
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) 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];**

- e) 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, 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 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 (Advisory/Clarification/Fine/Show Cause Notice/Warning etc.)	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
Nil										

- 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
1	On 24 th February, 2025 Company received application from members of promoters group and they are requested to reclassify their shareholding from the "Promoters Category to Public Category". Following the request on 01 st March, 2025 the company has submitted the application to the BSE seeking to reclassification but at time of making application disclosure was not submitted in time.	31.03.2025	Regulation 31A(8)(c) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:- The following events shall be deemed to be material events and shall be disclosed by the listed entity to the stock exchanges as soon as reasonably possible and not later than twenty four hours from the occurrence of the event - (c) submission of application seeking no-objection or approval of the recognized stock exchanges for re-classification of status as public by the listed entity to the stock exchanges."	Delay by 9 days in intimating the stock exchange regarding submission of reclassification application of promoters	The Company submitted that the delay in disclosure was inadvertent and unintentional. It is pertinent to note that all other related disclosures pertaining to the event were made in a timely and appropriate manner in accordance with applicable regulations. The specific disclosure was subsequently made with a delay of nine days upon receipt of communication from the Exchange.	The Company has taken corrective steps and addressed the issue.



04	Disqualification of Director(s): None of the Director(s) of the Company are disqualified under Section 164 of Companies Act, 2013 as confirmed by listed entity	Yes	
05	Details related to Subsidiaries of listed entity have been examined w.r.t. : (a) Identification of material subsidiary company (b) Requirement with respect to disclosure of material as well as other subsidiary	NA NA	Company does not have any Subsidiary Company during the year under review
06	Preservation of Documents: 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	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	Yes	
08	Related Party Transactions: (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	Disclosure of events or information: 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.	Yes	
10	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	
11	Actions taken by SEBI or Stock Exchange, if any: 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.	Yes	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	Resignation of Statutory auditors from the listed entity or its material subsidiaries: 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	NA	There was no Resignation of the Statutory Auditor of the Company or its material subsidiary during the review period.
13	Additional Non-compliances, if any: No additional non-compliance observed for all SEBI regulation / circular / guidance note etc.	No	At least 50% of non-promoter's holdings are required to be held in dematerialized form; However the same has not yet been complied with.

14	The listed entity to comply with the following requirements for disclosure of Employee Benefit Scheme Documents in terms of regulation 46(2)(za) of the LODR: a) The scheme document shall be uploaded on the website of the listed entity after obtaining shareholder approval as required under SEBI (SBEB) Regulations, 2021. b) The documents uploaded on the website shall mandatorily have minimum information to be disclosed to shareholders as per SEBI (SBEB) Regulations, 2021. c) The rationale for redacting information from the documents and the justification as to how such redacted information would affect competitive position or reveal commercial secrets of the listed entity shall be placed before the board of directors for consideration and approval.	NA NA NA	Not Applicable (Since the listed entity does not have any employee benefit scheme.)
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**Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'*

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 neither an assurance as to the future viability of the company nor of the efficacy or effectiveness with which the management has conducted the affairs of the company.
5. It is the responsibility of the Company's management to maintain records and establish appropriate systems for ensuring compliance with applicable SEBI Regulations, circulars, and guidelines issued from time to time and to ensure the adequacy and operational effectiveness of such systems.
6. The audit was conducted in accordance with the **Guidance Note on Annual Secretarial Compliance Report** issued by the **Institute of Company Secretaries of India (ICSI)**, involving such examinations and verifications as deemed necessary and adequate for the purpose.

Date: 13th May, 2026

Place: Indore

UDIN: F005201H000353472

**For Joshi Sahay and Company
Company Secretaries**

L.N. Joshi

**L.N. Joshi
Partner**

FCS: 5201, C P No: 4216

PR Certificate No. 6873/2025

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