



L N JOSHI & CO.

PRACTISING COMPANY SECRETARY

L N Joshi

M. Com., LL.B. (Hons) , FCS
Insolvency Professional

Cell

+91 94250 60308

E-mail

lnjoshics@gmail.com

122, Krishna Business Centre, 11, P.U. 4, Next to Medanta Hospital,
Rasoma Square, Indore - 452010 (M.P.) | Ph.: (0731) 4266708, 4959087

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 2020-21.

Dear Sirs,

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 8th February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the Management of the Company to maintain records, devise proper systems to ensure compliance with the provisions of all the applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

My responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

My audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose.

Due to the pandemic caused by COVID-19 and prevailing lockdowns/ restrictions on movement of people imposed by the Government, for the purpose of issuing this report, I have conducted my audit remotely based on the records and information made available to me by the Company electronically.

Annual Secretarial Compliance Report is enclosed.

Place: Indore

Date: 16th June, 2021

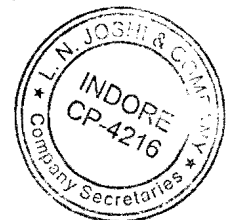
**For L.N. Joshi & Company
Company Secretaries**

L.N. Joshi

L.N. Joshi

Proprietor

FCS: 5201, CP 4201





L N JOSHI & CO.
PRACTISING COMPANY SECRETARY

122, Krishna Business Centre, 11, P.U. 4, Next to Medanta Hospital,
Rasoma Square, Indore - 452010 (M.P.) | Ph.: (0731) 4266708, 4959087

L N Joshi
M. Com., LL.B. (Hons), FCS
Insolvency Professional

Cell
+91 94250 60308

E-mail
lnjoshics@gmail.com

**SECRETARIAL COMPLIANCE REPORT
OF
MID INDIA INDUSTRIES LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2021**

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

I, L.N. Joshi, proprietor of M/s L N Joshi and Co., Practicing Company Secretaries have examined:

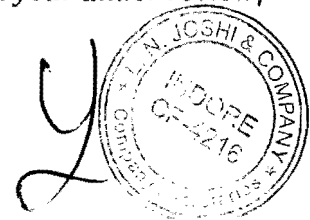
- a) all the documents and records made available to me and explanation provided by **MID INDIA INDUSTRIES LIMITED** ("the listed entity"),
- b) the filings/ submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity,
- d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

For the year ended 31st March, 2021 (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 (Buyback 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) Regulations, 2014; **[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 Debt Securities) Regulations, 2008; **[Not Applicable as there was no reportable event during the financial year under review]**
- g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; **[Not Applicable as there was no reportable event during the financial year under review]**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- and 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)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	As per SEBI Circular No. CIR/CFD/CMD/13/2015 dated 30th November, 2015 at-least 50% of shares Non-Promoters holding shall be in dematerialized form.	50% of shares of Non-Promoters not held in Dematerialized form.	Out of total Non promoter shareholding only 31.42% Non promoters shares held in dematerialized form while as per SEBI circular No. CIR/CFD/ CMD / 13/ 2015 dated 30th November, 2015 at least 50% shares of Non promoter holding shall be in de-mate mode. However Company has taken necessary step to achieve the same.

- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from my examination of those records.
- c) The following are the details of actions taken against the listed entity/ its promoters/ directors either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued there under:



Sr. No	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/remarks of the Practicing Company Secretary, if any
NIL				

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

S. No	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended <i>(The years are to be mentioned)</i>	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NOT APPLICABLE				

I further certify that the listed entity has complied with requirements of paragraph 6(A) and 6(B) of SEBI Circular CIR/CFD/CMDI/114/2019 dated 18th October, 2019

Note:- Due to COVID-19 Pandemic impact and situation of partial/complete lockdown, the documents for conducting the audit were obtained through electronic mode for verification.

Place: Indore

Date: 16th June, 2021

For L.N. Joshi & Company
Company Secretaries

L.N. Joshi

L.N. Joshi
Proprietor

FCS: 5201, C P No: 4216

UDIN :F005201C000474417

PR 506/2017

