

# MIDLAND POLYMERS LIMITED

CIN: L62013TS1992PLC178971

Regd. Off: Plot no. 8-2-603/23/3 & 8-2-603/23, 15, 2nd Floor, HSR Summit Banjara Hills, Hyderabad,  
Khairatabad, Telangana, India, 500034

Ph.no: +918125730447 email id: midland.polymers@gmail.com

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Date: 30.05.2025

To,

**BSE Limited**

P. J. Towers, Dalal Street  
Mumbai – 400001

**Sub: Annual Secretarial Compliance Report for the year ended 31.03.2025 pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirement) (Amendment) Regulations, 2018**

**Unit: Midland Polymers Limited (Scrip: 531597)**

Dear Sir/ Madam,

With reference to the above mentioned subject, please find enclosed Annual Secretarial Compliance Report for the year ended 31.03.2025 pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirement) (Amendment) Regulations, 2018.

We request you to take note of the same in your records.

Thanking you.

**Yours sincerely,**

**For Midland Polymers Limited**

**VANAJA**

**VEERAMRED**

**DY**

**Vanaja Veeramreddy**

**Managing Director**

**DIN: 07019245**

Digitally signed by  
VANAJA  
VEERAMREDDY  
Date: 2025.05.30  
17:03:12 +05'30'

**Encl: as above:**



## Vivek Surana & Associates

Practicing Company Secretaries

### SECRETARIAL COMPLIANCE REPORT OF MIDLAND POLYMERS LIMITED FOR THE FINANCIAL YEAR ENDED 31.03.2025

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **MIDLAND POLYMERS LIMITED** (hereinafter referred as 'the listed entity'), having its Registered Office at Plot no. 8-2-603/23/3 & 8-2-603/23, 15, 2nd Floor, HSR Summit, Banjara Hills, Hyderabad – 500034, Telangana. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations thereon. Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers and authorized representatives during the conduct of Secretarial Review, we hereby report that the listed entity has, during the review period covering the financial year ended on 31<sup>st</sup> March, 2025 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

We, **Vivek Surana & Associates**, Practicing Company Secretaries have examined:

- (a) All the documents and records made available to us and explanation provided by **MIDLAND POLYMERS 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 report.

For the financial year ended 31<sup>st</sup> March, 2025 ("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;

Pursuant to the approved resolution plan as per the NCLT order dated 18.08.2023 and BSE vide Letter dated 22.11.2024, the securities of Midland Polymers Ltd which were under suspension from 27.02.20215 were revoked w.e.f. 28.11.2024.

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- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not Applicable**
- (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 during the year under review.**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **Not Applicable during the year under review.**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible) Regulations, 2021; **Not Applicable during the year under review.**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued there under;
- (h) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 to the extent applicable.

and circulars/guidelines issued thereunder,

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 wherever applicable, except in respect of matters specified below:

S. No	Compliance Requirement (Regulation s/ 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	Management Response	Remarks
-	-	-	-	-	-	-	-	-	-	-



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- 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	Observations /made in the secretarial compliance report for the year ended March 31, 2024	Compliance Requirement (Regulations/circular/guidelines including specific clause)	Details of violation/deviations and actions 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	The Company has not yet filed the Audited/Unaudited Financial Results for the Quarter ended 31.03.2023, 30.06.2023 and 30.09.2023	The Company was under CIRP and the new management is taking sincere efforts to submit the same shortly	Non submission of Audited/Unaudited Financial Results for the Quarter ended 31.03.2023, 30.06.2023 and 30.09.2023 (Reg 33 of SEBI LODR Regulations)	Non submission of Audited/Unaudited Financial Results for the Quarter ended 31.03.2023, 30.06.2023 and 30.09.2023	The Company has filed the same on 03.08.2024.	The Company has filed the same on 03.08.2024.
2	The Company has not yet filed the Annual report for the FY 2022-23	The Company was under CIRP and the new management is taking sincere efforts to submit the same shortly	Non submission of Annual report for the FY 2022-23 (Reg 34 of SEBI LODR Regulations)	Non submission of Annual report for the FY 2022-23	The Company was under CIRP	-
3	The Company has not yet filed the Annual Secretarial Compliance report for the FY 2022-23	The Company was under CIRP.	Non submission of Annual Secretarial Compliance report for the FY 2022-23 (Reg 24A of SEBI LODR Regulations)	Non submission of Annual Secretarial Compliance report for the FY 2022-23	The Company was under CIRP	-
4	The Company has not yet filed the Related Party Transaction for	The Company was under CIRP and the new management	Non submission of Related Party Transaction for the	Non submission of Related Party Transaction for the Quarter ended 31.03.2023 and	The Company was under CIRP	-

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	the Quarter ended 31.03.2023 and 30.09.2023	is taking sincere efforts to submit the same shortly	Quarter ended 31.03.2023 and 30.09.2023 (Reg 23 of SEBI LODR Regulations)	30.09.2023		
5	The Company has not yet filed the Reconciliation of Share Capital Audit Report for the Quarter ended 31.03.2023	The Company was under CIRP and the new management is taking sincere efforts to submit the same shortly	Non submission of Reconciliation of Share Capital Audit Report for the Quarter ended 31.03.2023. (Reg 76 of SEBI DP Regulations)	Non submission of Reconciliation of Share Capital Audit Report for the Quarter ended 31.03.2023.	The Company was under CIRP	-
6	The Company has not yet filed the RTA Certificate for the Year ended 31.03.2023	The Company was under CIRP and the new management is taking sincere efforts to submit the same shortly	Non submission of RTA Certificate for the Year ended 31.03.2023. (Reg 7 (3) of SEBI LODR Regulations)	Non submission of RTA Certificate for the Year ended 31.03.2023.	The Company was under CIRP	-
7	The Company has field the Corporate Governance for the Quarter ended 31.03.2023 with a delay.	The Company was under CIRP. However, the same has been filed.	Delay in submission of Corporate Governance for the Quarter ended 31.03.2023 (Reg 27 of SEBI LODR Regulations)	Delay in submission of Corporate Governance for the Quarter ended 31.03.2023	The Company was under CIRP	-
8	The Company has field the PCS Certificate with a delay.	The Company was under CIRP. However, the same has been filed.	Delay in submission of PCS Certificate for the Year ended 31.03.2023 (Reg 40(9) of SEBI LODR Regulations)	Delay in submission of PCS Certificate for the Year ended 31.03.2023	The Company was under CIRP	-

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9	The Company has appointed Company Secretary w.e.f 15.09.2023. There was no Company Secretary for the audit period 01.04.2023 to 14.09.2023.	The Company has appointed Company Secretary w.e.f 15.09.2023.	Non appointment of CS (Reg 6 and 26 of SEBI LODR Regulations)	Non appointment of Company Secretary	The Company was under CIRP	-
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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.	<b>Secretarial Standards:</b> 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.	Yes	Nil
2.	<b>Adoption and timely updation of the Policies:</b> <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 entities</li><li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI</li></ul>	Yes Yes	Nil Nil
3.	<b>Maintenance and disclosures on Website:</b> <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 document(s)/ section of the website</li></ul>	Yes	Nil
4.	<b>Disqualification of Director (s):</b>		

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	None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	Nil
5.	<b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b> a) Identification of material subsidiary companies b) Disclosure requirement of material as well as other subsidiaries	NA	The listed entity has no subsidiaries
6.	<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	Nil
7.	<b>Performance Evaluation:</b> 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.	Yes	Nil
8.	<b>Related Party Transactions:</b> a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	Yes NA	Nil The listed entity has obtained prior approval of Audit Committee
9.	<b>Disclosure of events or information:</b> 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.	Yes	Nil
10.	<b>Prohibition of Insider Trading:</b> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	No	Few of the entries are not captured in Structured Digital

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			Database within prescribed timelines
11.	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> No action(s) 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 thereunder.	Yes	Nil
12.	<b>Resignation of statutory auditors from the listed entity or its material subsidiaries:</b> 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.	NA	There was no appointment/ reappointment/ resignation of Statutory auditor in the listed entity during the review period.
13.	<b>Additional Non-compliances, if any:</b> No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	Nil

We further, report that the listed entity is in compliance/ not in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations. Not applicable

### 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.

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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.
5. This Report is limited to the Statutory Compliances on laws/ regulations / guidelines listed in our report which have been complied with by the Company up to the date of this Report pertaining to the financial year ended March 2025.
6. The compliance of the provisions of Corporate and other applicable laws, rules, regulations, standards is the responsibility of management. Our examination was limited to the verification of procedures on random test basis.
7. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the secretarial records. The verification was done on the random test basis to ensure that correct facts are reflected in secretarial records. We believe that the processes and practices, we followed provide a reasonable basis for our opinion.

For Vivek Surana & Associates



Vivek Surana  
Proprietor

M. No. A24531 C.P No: 12901

UDIN: A024531G000493428

PR: 1809/2022

Firm Registration No. - S2014TL278800

Place: Hyderabad

Date: 29.05.2025