

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

Website: www.midlandpolymers.com

To,
The Manager
BSE Limited
P. J. Towers, Dalal Street
Mumbai-400001

Date: 30.05.2026

Dear Sir/Madam,

Unit: Midland Polymers Limited (Scrip Code: 531597)

Sub: Annual Secretarial Compliance Report for the year ended 31st March, 2026 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")

With reference to the subject cited, please find the enclosed Annual Secretarial Compliance Report pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the year ended 31.03.2026.

This is for your information and records.

Thanking you.

Yours Faithfully,
For Midland Polymers Limited

Vanaja Veeramreddy
Managing Director
DIN: 07019245

Encl: a/a



NUREN LODAYA & ASSOCIATES
COMPANY SECRETARY
(Peer Reviewed Firm)

Phone Number: 7021113226
Email: csnuren@gmail.com

Registered Address: B 403, Pranav Commercial Plaza,
MG Road, West, Mumbai 400080

**Secretarial Compliance Report of Midland Polymers Limited
for the financial year ended 31st March, 2026.**

I 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 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 thereunder; and
 - (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the regulations, circulars, guidelines issued thereunder by the SEBI;

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

- (a) Securities and Exchange Board of India (LODR) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (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 Review Period)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (Not applicable during the Review Period)
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (Not applicable



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during the Review Period)

- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; (Not applicable to the Listed Entity during the Review Period)
- (i) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with clients.
- (j) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009; and
- (k) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;
- (l) other regulations as applicable.

and circulars/ guidelines issued thereunder and based on the above examination, I hereby report that, during the Review Period 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 thereunder, except in respect of matters specified below:



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<i>Sr. No.</i>	<i>Compliance Requirement (Regulations/circulars/guidelines including specific clause)</i>	<i>Regulation/Circular No.</i>	<i>Deviations</i>	<i>Action Taken by</i>	<i>Type of Action</i>	<i>Details of Violation</i>	<i>Fine Amount</i>	<i>Observations/Remarks of the Practicing Company Secretary (PCS)</i>	<i>Management Response</i>	<i>Remarks</i>
1	Disclosure relating to composition of Audit Committee in the Integrated Governance Report for the quarter and half year ended 30.09.2025	Regulation 18(1) of SEBI (LODR) Regulations, 2015	The Company inadvertently missed to mention the name of Ms. Vanaja Veeramreddy (Managing Director) who resigned as member in the Audit Committee w.e.f., 04.08.2025 in the Integrated Governance Report for quarter and half year ended 30.09.2025.	BSE Limited	Fine	The Company had submitted the Integrated Governance Report for the quarter and half year ended 30.09.2025 within the prescribed timeline on 23.10.2025. However, due to an inadvertent omission, the resignation of Ms. Vanaja Veeramreddy from the Audit Committee w.e.f. 04.08.2025 was not reflected in the Audit Committee composition details. Notwithstanding the disclosure omission, the Company continued to maintain a duly constituted Audit Committee in compliance with Regulation 18(1) of SEBI (LODR) Regulations, 2015, comprising Ms. Priyanka Agarwal (Chairperson & Independent Director), Mr. Shivashankar Reddy Gopavarapu (Independent Director) and Ms. Mounika Pammi (Independent Director, appointed w.e.f. 04.08.2025). Pursuant to the aforesaid omission, BSE Limited, vide email dated 28.11.2025, levied a fine of Rs. 80,240/- for non-compliance under Regulation 18(1) of SEBI (LODR) Regulations, 2015. Subsequently, the Company filed a revised	Rs. 80,240/-	Based on the records and explanations provided, the non-compliance pertains to an inadvertent disclosure omission in the Integrated Governance Report and not to the actual constitution of the Audit Committee. The Company has subsequently rectified the disclosure by filing a revised report and has paid the fine imposed by BSE Limited. Further the Company has submitted a Waiver	The Management stated that the omission was inadvertent in nature and confirmed that the Company remained compliant with the requirements relating to constitution of the Audit Committee under Regulation 18(1) of SEBI (LODR) Regulations, 2015 throughout the period. The revised Integrated Governance Report has been filed and the fine imposed by BSE Limited has been duly paid. Further the	Fine paid and disclosure subsequently rectified further Waiver Application has been submitted.



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<i>Sr. No.</i>	<i>Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)</i>	<i>Regulation/ Circular No.</i>	<i>Deviations</i>	<i>Action Taken by</i>	<i>Type of Action</i>	<i>Details of Violation</i>	<i>Fine Amount</i>	<i>Observations/ Remarks of the Practicing Company Secretary (PCS)</i>	<i>Management Response</i>	<i>Remarks</i>
						Integrated Governance Report on 26.12.2025 and remitted the fine amount on 31.12.2025. Further the Company has submitted a Waiver Application on 22.01.2026 for the same.		Application on 22.01.2026 for the same.	Company has submitted a Waiver Application on 22.01.2026 for the same.	

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

<i>Sr. No.</i>	<i>Observations/ Remarks of the Practicing Company Secretary (PCS) in the previous reports</i>	<i>Observations made in the Secretarial Compliance report for the year ended 2025</i>	<i>Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)</i>	<i>Details of violation / Deviations and actions taken/ penalty imposed, if any, on the listed entity</i>	<i>Remedial actions, if any, taken by the listed entity</i>	<i>Comments of the PCS on the actions taken by the listed entity</i>
NIL						

I hereby report that, during the review period the compliance status of the listed entity with the following requirements:

<i>Sr. No</i>	<i>Particulars</i>	<i>Compliance Status (Yes/ No/ NA)</i>	<i>Observations/ Remarks by PCS*</i>
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	Yes	
2.	Adoption and timely updation of the Policies: All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities. All the policies are in conformity with SEBI Regulations and	Yes	



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<i>Sr. No</i>	<i>Particulars</i>	<i>Compliance Status (Yes/ No/ NA)</i>	<i>Observations/ Remarks by PCS*</i>
	have been reviewed & updated on time, as per the regulations/ circulars/guidelines issued by SEBI.		
3.	Maintenance and disclosures on Website: The listed entity is maintaining a functional website. Timely dissemination of the documents/ information under a separate section on the website. Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/section of the website.	Yes	
4.	Disqualification of Director(s): None of the director(s) of the listed entity is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	
5.	Details related to subsidiaries of listed entities have been examined w.r.t.: Identification of material subsidiary companies. Disclosure requirement of material as well as other subsidiaries.	NA	
6.	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	
7.	Performance Evaluation: 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	
8.	Related Party Transactions: The listed entity has obtained prior approval of audit committee for all related party transactions; 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	
9.	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 thereunder.	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(s), if any: No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either	Yes	



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<i>Sr. No</i>	<i>Particulars</i>	<i>Compliance Status (Yes/ No/ NA)</i>	<i>Observations/ Remarks by PCS*</i>
	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 (or) The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.		
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 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	
13.	Additional Non-compliances, if any: No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.	Yes	Nothing except mentioned above

We further, report that the listed entity is in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations. Further, it is noted that the Structured Digital Database (SDD) under Regulation 3(5) of SEBI (Prohibition of Insider Trading) Regulations, 2015 was maintained by the Company during FY 2025-26.

Assumptions & limitation of scope and review:

- Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
- Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
- I have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
- This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) 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.



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Signature: NUREN
NIRMAL
LODAYA

Digitally signed by
NUREN NIRMAL
LODAYA
Date: 2026.05.30
16:33:02 +05'30'

Date: 30/05/2026

Name of the PCS: Nuren Lodaya

Place: Mumbai

ACS/ FCS No.: 60128

CP No.: 24248

UDIN: A060128H000555876

PR No. 5666/2024

FR No. S2021MH811800