



**M Lakhamsi
Industries Limited**

505, Churchgate Chambers, 5 New Marine Lines,
Mumbai – 400 020. India.

Tel: (91 22) 2262 0722 / 24 | Fax: (91 22) 2262 0706

Email: info@m.lakhamsi.com | www.m.lakhamsi.com

CIN : L51900MH1985PLC034994

Government Recognised Export House

To,

Date: 09.02.2024

The Manager, Listing Department, BSE Limited, Phiroze Jeejeebhoy Towers Dalal Street 28th Floor, Dalal Street, Mumbai- 400001	Company Symbol: MLINDLTD Script Code: 512153
--	---

Subject: Clarification in respect to our intimation dated 29.01.2024, 01.02.2024 and 08.02.2024 regarding Re-classification of Shares from “Promoter and Promoter Group” to “Public” Category

Dear Sir,

As per the captioned subject, we would like to draw your attention to an oversight in our communications regarding the re-classification from "Promoter and Promoter Group" category to the "Public" category.

In our previous intimation dated 29.01.2024, 01.02.2024, and 08.02.2024, we informed you about the re-classification from the "Promoter and Promoter Group" category to the "Public" category. However, we regret to inform you that there was an inadvertent error on our part that occurred during uploading intimation that we forgot to attach the request letter from Promoter who initiated the process.

Further, we are hereby enclosing the request letter for your kind perusal.

You are requested to take the same on record and do the needful.

**Thanking you,
Yours Faithfully**

**For & on behalf of
M Lakhamsi Industries Limited**

MALLIKA
SANJIV
SAWLA
Digitally signed by
MALLIKA SANJIV
SAWLA
Date: 2024.02.09
16:00:29 +05'30'

**Mallika Sanjiv Sawla
Director & CFO
DIN: 01943285**

Ashay S Mehta

5 Normandie, 25 Carmichael Road, Mumbai-400 026.

To
The Board of Directors
M Lakhamsi Industries Ltd
505 Churchgate Chambers,
5 New Marine Lines,
Mumbai, Maharashtra, 400020_

Date: 23/01/2024

Sub: Request letter for reclassification from Promoter group to Public category shareholders in M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Ltd. ("Company")) as per Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015

Ref:

- 1) CIN : L51900MH1985PLC034994
- 2) BSE Scrip code : 512153

Dear Sir(s)/Madam(s)

I, Ashay Shreyas Mehta , residing at 5 Normandie, 25 Carmichael Road, Mumbai-400 026 a member of Promoter Group/ Persons acting concert (PAC) in the Company am presently holding NIL no. of equity shares (0.00% of the total shareholding of the Company) in Demat I was classified as a member of Promoter group/PAC in the Company before the completion of Open Offer in the FY 2021-22.

Since from last 2 years, I am in no way associated to the business or management of the Company. Further I am not engaged in the management of the Company and also do not have any right either to appoint any Director of the Company or an ability to control the management or policy decisions of the Company in any manner whatsoever including by virtue of my shareholding and that none of my acts would influence the decision making in the Company. Accordingly, I request you to reclassify myself from "**Promoter Group**" category to "**Public Category**" shareholder.

Further I confirm and undertake the following:

(1) I along with persons related to me together:

- (a) I, or along with my immediate relatives do not hold more than 10% of the paid-up equity share capital of the Company;

- (b) I, or along with my immediate relatives directly or indirectly, do not exercise control over the affairs of the Company;
- (c) I, or any of my immediate relatives do not have any special rights in the Company through formal or informal arrangements including through any shareholder agreement;
- (d) I, or any of my immediate relatives, do not hold any position of Board of Directors in the company;
- (e) I, or any of my immediate relatives, do not hold any key managerial personnel position in the Company;
- (f) I am not declared as wilful defaulter as per the Reserve bank of India Guidelines;
- (g) No regulatory action is pending against me
- (h) I am not a fugitive economic offender.

(2) There is no pending regulatory action against me.

(3) Further I also confirm that

- (a) I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) at all time from the date of reclassification failing which, I shall be reclassified as promoter group of the Company.
- (b) I shall comply with the conditions mentioned in the sub-clauses (iv), (v) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter group of the Company.

I, request you to take necessary steps for my reclassification from promoter group category to public category shareholder in **M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Limited)** and also assure you my full cooperation in all the ways during the entire process of reclassification and I will submit the necessary documents if any required by the Statutory Authorities during the process of approval.

Thanking you,


(Ashay Shreyas Mehta)

Bela Bhavin Kothari

101 Land Mark, 25 Carmichael Road, Mumbai-400 026.

To

Date: 23/01/2023

The Board of Directors

M Lakhamsi Industries Ltd

505 Churchgate Chambers,

5 New Marine Lines,

Mumbai, Maharashtra, 400020_

Sub: Request letter for reclassification from Promoter group to Public category shareholders in M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Ltd.) ("Company") as per Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015

Ref:

1) CIN : L51900MH1985PLC034994

2) BSE Scrip code : 512153

Dear Sir(s)/Madam(s)

I, Bela Bhavin Kothari , residing at 101 Land Mark, Carmichael Road, Mumbai -400 026 a member of Promoter Group/ Persons acting concert (PAC) in the Company am presently holding NIL no. of equity shares (0.00% of the total shareholding of the Company) in Demat I was classified as a member of Promoter group/PAC in the Company before the completion of Open Offer in the FY 2021-22.

Since from last 2 years, I am in no way associated to the business or management of the Company. Further I am not engaged in the management of the Company and also do not have any right either to appoint any Director of the Company or an ability to control the management or policy decisions of the Company in any manner whatsoever including by virtue of my shareholding and that none of my acts would influence the decision making in the Company. Accordingly, I request you to reclassify myself from "**Promoter Group**" category to "**Public Category**" shareholder.

Further I confirm and undertake the following:

(1) I along with persons related to me together:

(a) I, or along with my immediate relatives do not hold more than 10% of the paid-up equity share capital of the Company;

(b) I, or along with my immediate relatives directly or indirectly, do not exercise control over the affairs of the Company;

- (c) I, or any of my immediate relatives do not have any special rights in the Company through formal or informal arrangements including through any shareholder agreement;
- (d) I, or any of my immediate relatives, do not hold any position of Board of Directors in the company;
- (e) I, or any of my immediate relatives, do not hold any key managerial personnel position in the Company;
- (f) I am not declared as wilful defaulter as per the Reserve bank of India Guidelines;
- (g) No regulatory action is pending against me
- (h) I am not a fugitive economic offender.

(2) There is no pending regulatory action against me.

(3) Further I also confirm that

- (a) I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) at all time from the date of reclassification failing which, I shall be reclassified as promoter group of the Company.
- (b) I shall comply with the conditions mentioned in the sub-clauses (iv), (v) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter group of the Company.

I, request you to take necessary steps for my reclassification from promoter group category to public category shareholder in **M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Limited)** and also assure you my full cooperation in all the ways during the entire process of reclassification and I will submit the necessary documents if any required by the Statutory Authorities during the process of approval.

Thanking you,



(Bela Bhavin Kothari)

Leena Samir Mehta

2nd Floor, Motilal Mansion, 17 N.S.Road, Mumbai - 400 036.

To
The Board of Directors
M Lakhamsi Industries Ltd
505 Churchgate Chambers,
5 New Marine Lines,
Mumbai, Maharashtra, 400020.

Date: 23/01/2024

Sub: Request letter for reclassification from Promoter group to Public category shareholders in M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Ltd.) ("Company") as per Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015

Ref:
1) CIN : L51900MH1985PLC034994
2) BSE Scrip code : 512153

Dear Sir(s)/Madam(s)

I, Leena Samir Mehta, residing at 2nd Floor, Motilal Mansion, 17 N.S. Road, Mumbai -400 036 a member of Promoter Group/ Persons acting concert (PAC) in the Company am presently holding NIL no. of equity shares (0.00% of the total shareholding of the Company) in Demat I was classified as a member of Promoter group/PAC in the Company before the completion of Open Offer in the FY 2021-22.

Since from last 2 years, I am in no way associated to the business or management of the Company. Further I am not engaged in the management of the Company and also do not have any right either to appoint any Director of the Company or an ability to control the management or policy decisions of the Company in any manner whatsoever including by virtue of my shareholding and that none of my acts would influence the decision making in the Company. Accordingly, I request you to reclassify myself from "**Promoter Group**" category to "**Public Category**" shareholder.

Further I confirm and undertake the following:

(1) I along with persons related to me together:

(a) I, or along with my immediate relatives do not hold more than 10% of the paid-up equity share capital of the Company;

(b) I, or along with my immediate relatives directly or indirectly, do not exercise control over the affairs of the Company;

(c) I, or any of my immediate relatives do not have any special rights in the Company through formal or informal arrangements including through any shareholder agreement;

(d) I, or any of my immediate relatives, do not hold any position of Board of Directors in the company;

(e) I, or any of my immediate relatives, do not hold any key managerial personnel position in the Company;

(f) I am not declared as wilful defaulter as per the Reserve bank of India Guidelines;

(g) No regulatory action is pending against me

(h) I am not a fugitive economic offender.

(2) There is no pending regulatory action against me.

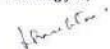
(3) Further I also confirm that

(a) I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) at all time from the date of reclassification failing which, I shall be reclassified as promoter group of the Company.

(b) I shall comply with the conditions mentioned in the sub-clauses (iv), (v) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter group of the Company.

I, request you to take necessary steps for my reclassification from promoter group category to public category shareholder in **M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Limited)** and also assure you my full cooperation in all the ways during the entire process of reclassification and I will submit the necessary documents if any required by the Statutory Authorities during the process of approval.

Thanking you,



(Leena Samir Mehta)

Mansi Samir Mehta

2nd Floor, Motilal Mansion, 17 N.S.Road, Mumbai - 400 036.

To
The Board of Directors
M Lakhamsi Industries Ltd
505 Churchgate Chambers,
5 New Marine Lines,
Mumbai, Maharashtra, 400020.

Date: 23/01/2024

Sub: Request letter for reclassification from Promoter group to Public category shareholders in M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Ltd.) ("Company") as per Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015

Ref:

1) CIN : 151900MH1985PLC034994
2) BSE Scrip code : 512153

Dear Sir(s)/Madam(s)

I, Mansi Samir Mehta, residing at 2nd Floor, Motilal Mansion, 17 N.S. Road, Mumbai -400 036 a member of Promoter Group/ Persons acting concert (PAC) in the Company am presently holding Nil. no. of equity shares (0.00% of the total shareholding of the Company) in Demat I was classified as a member of Promoter group/PAC in the Company before the completion of Open Offer in the FY 2021-22.

Since from last 2 years, I am in no way associated to the business or management of the Company. Further I am not engaged in the management of the Company and also do not have any right either to appoint any Director of the Company or an ability to control the management or policy decisions of the Company in any manner whatsoever including by virtue of my shareholding and that none of my acts would influence the decision making in the Company. Accordingly, I request you to reclassify myself from "Promoter Group" category to "Public Category" shareholder.

Further I confirm and undertake the following:

(1) I along with persons related to me together:

(a) I, or along with my immediate relatives do not hold more than 10% of the paid-up equity share capital of the Company;

(b) I, or along with my immediate relatives directly or indirectly, do not exercise control over the affairs of the Company;

(c) I, or any of my immediate relatives do not have any special rights in the Company through formal or informal arrangements including through any shareholder agreement;

(d) I, or any of my immediate relatives, do not hold any position of Board of Directors in the company;

(e) I, or any of my immediate relatives, do not hold any key managerial personnel position in the Company;

(f) I am not declared as wilful defaulter as per the Reserve bank of India Guidelines;

(g) No regulatory action is pending against me

(h) I am not a fugitive economic offender.

(2) There is no pending regulatory action against me.

(3) Further I also confirm that

(a) I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) at all time from the date of reclassification failing which, I shall be reclassified as promoter group of the Company.

(b) I shall comply with the conditions mentioned in the sub-clauses (iv), (v) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter group of the Company.

I, request you to take necessary steps for my reclassification from promoter group category to public category shareholder in **M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Limited)** and also assure you my full cooperation in all the ways during the entire process of reclassification and I will submit the necessary documents if any required by the Statutory Authorities during the process of approval.

Thanking you,

(Mansi Samir Mehta)

Nilima S Mehta

5 Normandie, 25 Carmichael Road, Mumbai-400 026.

To
The Board of Directors
M Lakhamsi Industries Ltd
505 Churchgate Chambers,
5 New Marine Lines,
Mumbai, Maharashtra, 400020

Date: 23/01/2024

Sub: Request letter for reclassification from Promoter group to Public category shareholders in M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Ltd. ("Company")) as per Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015

Ref:

- 1) CIN : L51900MH1985PLC034994
- 2) BSE Scrip code : 512153

Dear Sir(s)/Madam(s)

I, Nilima Shreyas Mehta , residing at 5 Normandie, 25 Carmichael Road, Mumbai-400 026 a member of Promoter Group/ Persons acting concert (PAC) in the Company am presently holding NIL no. of equity shares (0.00% of the total shareholding of the Company) in Demat I was classified as a member of Promoter group/PAC in the Company before the completion of Open Offer in the FY 2021-22.

Since from last 2 years, I am in no way associated to the business or management of the Company. Further I am not engaged in the management of the Company and also do not have any right either to appoint any Director of the Company or an ability to control the management or policy decisions of the Company in any manner whatsoever including by virtue of my shareholding and that none of my acts would influence the decision making in the Company. Accordingly, I request you to reclassify myself from "**Promoter Group**" category to "**Public Category**" shareholder.

Further I confirm and undertake the following:

(1) I along with persons related to me together:

- (a) I, or along with my immediate relatives do not hold more than 10% of the paid-up equity share capital of the Company;

- (b) I, or along with my immediate relatives directly or indirectly, do not exercise control over the affairs of the Company;
- (c) I, or any of my immediate relatives do not have any special rights in the Company through formal or informal arrangements including through any shareholder agreement;
- (d) I, or any of my immediate relatives, do not hold any position of Board of Directors in the company;
- (e) I, or any of my immediate relatives, do not hold any key managerial personnel position in the Company;
- (f) I am not declared as wilful defaulter as per the Reserve bank of India Guidelines;
- (g) No regulatory action is pending against me
- (h) I am not a fugitive economic offender.

(2) There is no pending regulatory action against me.

(3) Further I also confirm that

- (a) I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) at all time from the date of reclassification failing which, I shall be reclassified as promoter group of the Company.
- (b) I shall comply with the conditions mentioned in the sub-clauses (iv), (v) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter group of the Company.

I, request you to take necessary steps for my reclassification from promoter group category to public category shareholder in **M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Limited)** and also assure you my full cooperation in all the ways during the entire process of reclassification and I will submit the necessary documents if any required by the Statutory Authorities during the process of approval.

Thanking you,



(Nilima Shreyas Mehta)

→
(MSM)

Nishita S Mehta

4 Usha Kiran, 2nd Floor, 15 M.L. Dahanukar Marg, Carmichael Road, Mumbai-400 026.

To
The Board of Directors

Date: 23/01/2024

M Lakhamsi Industries Ltd
505 Churchgate Chambers,
5 New Marine Lines,
Mumbai, Maharashtra, 400020.

Sub: Request letter for reclassification from Promoter group to Public category shareholders in M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Ltd. ("Company")) as per Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015

Ref:

- 1) CIN : L51900MH1985PLC034994
- 2) BSE Scrip code : 512153

Dear Sir(s)/Madam(s)

I, Nishita Shreyas Mehta , residing at 4 Usha Kiran, 2nd Floor, 15 M.L. Dahanukar Marg, Carmichael Road, Mumbai-400 026, a member of Promoter Group/ Persons acting concert (PAC) in the Company am presently holding NIL no. of equity shares (0.00% of the total shareholding of the Company) in Demat I was classified as a member of Promoter group/PAC in the Company before the completion of Open Offer in the FY 2021-22.

Since from last 2 years, I am in no way associated to the business or management of the Company. Further I am not engaged in the management of the Company and also do not have any right either to appoint any Director of the Company or an ability to control the management or policy decisions of the Company in any manner whatsoever including by virtue of my shareholding and that none of my acts would influence the decision making in the Company. Accordingly, I request you to reclassify myself from "**Promoter Group**" category to "**Public Category**" shareholder.

Further I confirm and undertake the following:

- (1) I along with persons related to me together:
 - (a) I, or along with my immediate relatives do not hold more than 10% of the paid-up equity share capital of the Company;
 - (b) I, or along with my immediate relatives directly or indirectly, do not exercise control over the affairs of the Company;

- (c) I, or any of my immediate relatives do not have any special rights in the Company through formal or informal arrangements including through any shareholder agreement;
- (d) I, or any of my immediate relatives, do not hold any position of Board of Directors in the company;
- (e) I, or any of my immediate relatives, do not hold any key managerial personnel position in the Company;
- (f) I am not declared as wilful defaulter as per the Reserve bank of India Guidelines;
- (g) No regulatory action is pending against me
- (h) I am not a fugitive economic offender.

(2) There is no pending regulatory action against me.

(3) Further I also confirm that

- (a) I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) at all time from the date of reclassification failing which, I shall be reclassified as promoter group of the Company.
- (b) I shall comply with the conditions mentioned in the sub-clauses (iv), (v) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter group of the Company.

I, request you to take necessary steps for my reclassification from promoter group category to public category shareholder in **M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Limited)** and also assure you my full cooperation in all the ways during the entire process of reclassification and I will submit the necessary documents if any required by the Statutory Authorities during the process of approval.

Thanking you,

Nishita Mehta

(Nishita Shreyas Mehta)

Rasiklal Hiralal & Co. Pvt. Ltd.

EC-4051, E Tower, Bharat Diamond Bourse, Bandra Kurla Complex, Bandra (E), Mumbai - 400051.

Tel: (91) (22) 26756802 Fax: 23630623 Email: limited@rhco.in

CIN NO. U52393MH1971PTC015293

To
The Board of Directors

Date: 23/01/2024

M Lakhamsi Industries Ltd

505 Churchgate Chambers,
5 New Marine Lines,
Mumbai, Maharashtra, 400020.

Sub: Request letter for reclassification from Promoter group to Public category shareholders in M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Ltd. ("Company")) as per Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015

Ref:

- 1) CIN : L51900MH1985PLC034994
2) BSE Scrip code : 512153

Dear Sir(s)/Madam(s)

I, Shreyas Ramniklal Mehta, Director of M/s RASIKLAL HIRALAL & CO. PVT. LTD Registered office at EC 4051&53, Bharat Diamond Bourse, BKC, Bandra (East), Mumbai - 400 051, a member of Promoter Group/ Persons acting concert (PAC) in the Company am presently holding NIL no. of equity shares (0.00% of the total shareholding of the Company) in Demat I was classified as a member of Promoter group/PAC in the Company before the completion of Open Offer in the FY 2021-22.

Since from last 2 years, I am in no way associated to the business or management of the Company. Further I am not engaged in the management of the Company and also do not have any right either to appoint any Director of the Company or an ability to control the management or policy decisions of the Company in any manner whatsoever including by virtue of my shareholding and that none of my acts would influence the decision making in the Company. Accordingly, I request you to reclassify myself from "**Promoter Group**" category to "**Public Category**" shareholder.

Further I confirm and undertake the following:

(1) I along with persons related to me together:

- (a) I, or along with my immediate relatives do not hold more than 10% of the paid-up equity share capital of the Company;
- (b) I, or along with my immediate relatives directly or indirectly, do not exercise control over the affairs of the Company;
- (c) I, or any of my immediate relatives do not have any special rights in the Company through formal or informal arrangements including through any shareholder agreement;

Rasiklal Hiralal & Co. Pvt. Ltd.

EC-4051, E Tower, Bharat Diamond Bourse, Bandra Kurla Complex, Bandra (E), Mumbai - 400051.

Tel: (91) (22) 26756802 Fax: 23630623 Email: limited@rhco.in

CIN NO. U52393MH1971PTC015293

- (d) I, or any of my immediate relatives, do not hold any position of Board of Directors in the company;
 - (e) I, or any of my immediate relatives, do not hold any key managerial personnel position in the Company;
 - (f) I am not declared as wilful defaulter as per the Reserve bank of India Guidelines;
 - (g) No regulatory action is pending against me
 - (h) I am not a fugitive economic offender.
- (2) There is no pending regulatory action against me.
- (3) Further I also confirm that
- (a) I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) at all time from the date of reclassification failing which, I shall be reclassified as promoter group of the Company.
 - (b) I shall comply with the conditions mentioned in the sub-clauses (iv), (v) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter group of the Company.

I, request you to take necessary steps for my reclassification from promoter group category to public category shareholder in **M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Limited)** and also assure you my full cooperation in all the ways during the entire process of reclassification and I will submit the necessary documents if any required by the Statutory Authorities during the process of approval.

Thanking you,

For Rasiklal Hiralal & Co. Pvt. Ltd.


Director / Manager

Sarita Ramesh Mehta

2nd Floor, Diamond House, 9 Vachha Gandhi Road, Mumbai - 400 007.

To
The Board of Directors
M Lakhamsi Industries Ltd
505 Churchgate Chambers,
5 New Marine Lines,
Mumbai, Maharashtra, 400020.

Date: 23/01/2024

Sub: Request letter for reclassification from Promoter group to Public category shareholders in M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Ltd. ("Company")) as per Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015

Ref:

- 1) CIN : L51900MH1985PLC034994
- 2) BSE Scrip code : 512153

Dear Sir(s)/Madam(s)

I, Sarita Ramesh Mehta, residing at 2nd Floor, Diamond House, 9 Vachha Gandhi Road, Mumbai -400 007 a member of Promoter Group/ Persons acting concert (PAC) in the Company am presently holding NIL no. of equity shares (0.00% of the total shareholding of the Company) in Demat I was classified as a member of Promoter group/PAC in the Company before the completion of Open Offer in the FY 2021-22.

Since from last 2 years, I am in no way associated to the business or management of the Company. Further I am not engaged in the management of the Company and also do not have any right either to appoint any Director of the Company or an ability to control the management or policy decisions of the Company in any manner whatsoever including by virtue of my shareholding and that none of my acts would influence the decision making in the Company. Accordingly, I request you to reclassify myself from "**Promoter Group**" category to "**Public Category**" shareholder.

Further I confirm and undertake the following:

(1) I along with persons related to me together:

- (a) I, or along with my immediate relatives do not hold more than 10% of the paid-up equity share capital of the Company;

- (b) I, or along with my immediate relatives directly or indirectly, do not exercise control over the affairs of the Company;
- (c) I, or any of my immediate relatives do not have any special rights in the Company through formal or informal arrangements including through any shareholder agreement;
- (d) I, or any of my immediate relatives, do not hold any position of Board of Directors in the company;
- (e) I, or any of my immediate relatives, do not hold any key managerial personnel position in the Company;
- (f) I am not declared as wilful defaulter as per the Reserve bank of India Guidelines;
- (g) No regulatory action is pending against me
- (h) I am not a fugitive economic offender.

(2) There is no pending regulatory action against me.

(3) Further I also confirm that

- (a) I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) at all time from the date of reclassification failing which, I shall be reclassified as promoter group of the Company.
- (b) I shall comply with the conditions mentioned in the sub-clauses (iv), (v) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter group of the Company.

I, request you to take necessary steps for my reclassification from promoter group category to public category shareholder in **M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Limited)** and also assure you my full cooperation in all the ways during the entire process of reclassification and I will submit the necessary documents if any required by the Statutory Authorities during the process of approval.

Thanking you,

5
Sarita Mehta
(Sarita Ramesh Mehta)

→
To: [unclear]

Shreyas Ramniklal Mehta

5 Normandie, 25 Carmichael Road, Mumbai-400 026.

To
The Board of Directors
M Lakhamsi Industries Ltd
505 Churchgate Chambers,
5 New Marine Lines,
Mumbai, Maharashtra, 400020.

Date: 23/01/2024

Sub: Request letter for reclassification from Promoter group to Public category shareholders in M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Ltd. ("Company")) as per Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015

Ref:

- 1) CIN : L51900MH1985PLC034994
- 2) BSE Scrip code : 512153

Dear Sir(s)/Madam(s)

I, Shreyas Ramniklal Mehta , residing at 5 Normandie, 25 Carmichael Road, Mumbai-400 026 a member of Promoter Group/ Persons acting concert (PAC) in the Company am presently holding NIL no. of equity shares (0.00% of the total shareholding of the Company) in Demat I was classified as a member of Promoter group/PAC in the Company before the completion of Open Offer in the FY 2021-22.

Since from last 2 years, I am in no way associated to the business or management of the Company. Further I am not engaged in the management of the Company and also do not have any right either to appoint any Director of the Company or an ability to control the management or policy decisions of the Company in any manner whatsoever including by virtue of my shareholding and that none of my acts would influence the decision making in the Company. Accordingly, I request you to reclassify myself from "**Promoter Group**" category to "**Public Category**" shareholder.

Further I confirm and undertake the following:

(1) I along with persons related to me together:

- (a) I, or along with my immediate relatives do not hold more than 10% of the paid-up equity share capital of the Company;

- (b) I, or along with my immediate relatives directly or indirectly, do not exercise control over the affairs of the Company;
- (c) I, or any of my immediate relatives do not have any special rights in the Company through formal or informal arrangements including through any shareholder agreement;
- (d) I, or any of my immediate relatives, do not hold any position of Board of Directors in the company;
- (e) I, or any of my immediate relatives, do not hold any key managerial personnel position in the Company;
- (f) I am not declared as wilful defaulter as per the Reserve bank of India Guidelines;
- (g) No regulatory action is pending against me
- (h) I am not a fugitive economic offender.

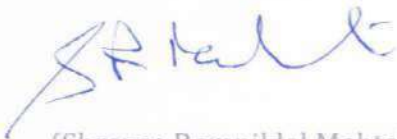
(2) There is no pending regulatory action against me.

(3) Further I also confirm that

- (a) I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) at all time from the date of reclassification failing which, I shall be reclassified as promoter group of the Company.
- (b) I shall comply with the conditions mentioned in the sub-clauses (iv), (v) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter group of the Company.

I, request you to take necessary steps for my reclassification from promoter group category to public category shareholder in **M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Limited)** and also assure you my full cooperation in all the ways during the entire process of reclassification and I will submit the necessary documents if any required by the Statutory Authorities during the process of approval.

Thanking you,



(Shreyas Ramniklal Mehta)

Samir Mehta

2nd Floor, Motilal Mansion, N.S.Road, Mumbai - 400 036.

To
The Board of Directors
M Lakhamsi Industries Ltd
505 Churchgate Chambers,
5 New Marine Lines,
Mumbai, Maharashtra, 400020.

Date: 23/01/2024

Sub: Request letter for reclassification from Promoter group to Public category shareholders in M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Ltd.) ("Company") as per Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015

Ref:
1) CIN : LS1900MH1985PLC034994
2) BSE Scrip code : 512153

Dear Sir(s)/Madam(s)

I, Samir Mahendra Mehta, residing at 2nd Floor, Motilal Mansion, 17 N.S. Road, Mumbai - 400 036 a member of Promoter Group/ Persons acting concert (PAC) in the Company am presently holding NIL no. of equity shares (0.00% of the total shareholding of the Company) in Demat I was classified as a member of Promoter group/PAC in the Company before the completion of Open Offer in the FY 2021-22.

Since from last 2 years, I am in no way associated to the business or management of the Company. Further I am not engaged in the management of the Company and also do not have any right either to appoint any Director of the Company or an ability to control the management or policy decisions of the Company in any manner whatsoever including by virtue of my shareholding and that none of my acts would influence the decision making in the Company. Accordingly, I request you to reclassify myself from "**Promoter Group**" category to "**Public Category**" shareholder.

Further I confirm and undertake the following:

(1) I along with persons related to me together:

(a) I, or along with my immediate relatives do not hold more than 10% of the paid-up equity share capital of the Company;

- (b) I, or along with my immediate relatives directly or indirectly, do not exercise control over the affairs of the Company;
- (c) I, or any of my immediate relatives do not have any special rights in the Company through formal or informal arrangements including through any shareholder agreement;
- (d) I, or any of my immediate relatives, do not hold any position of Board of Directors in the company;
- (e) I, or any of my immediate relatives, do not hold any key managerial personnel position in the Company;
- (f) I am not declared as wilful defaulter as per the Reserve bank of India Guidelines;
- (g) No regulatory action is pending against me
- (h) I am not a fugitive economic offender.

(2) There is no pending regulatory action against me.

(3) Further I also confirm that

- (a) I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) at all time from the date of reclassification failing which, I shall be reclassified as promoter group of the Company.
- (b) I shall comply with the conditions mentioned in the sub-clauses (iv), (v) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter group of the Company.

I, request you to take necessary steps for my reclassification from promoter group category to public category shareholder in **M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Limited)** and also assure you my full cooperation in all the ways during the entire process of reclassification and I will submit the necessary documents if any required by the Statutory Authorities during the process of approval.

Thanking you,


(Samir M Mehta)

Manjula Ratilal Mehta

4 Sethna House, 13 Laburnam Road, Gamdevi, Mumbai - 400 007.

To

23/01/2024

The Board of Directors

M Lakhamsi Industries Ltd

505 Churchgate Chambers,

5 New Marine Lines,

Mumbai, Maharashtra, 400020_

Date.

Sub: Request letter for reclassification from Promoter group to Public category shareholders in M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Ltd.) ("Company") as per Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015

Ref:

1) CIN : L51900MH1985PLC034994

2) BSE Scrip code : 512153

Dear Sir(s)/Madam(s)

I, Manjula Ratilal Mehta , residing at 4 Sethna House, 13 Laburnam Road, Gamdevi, Mumbai -400 007 a member of Promoter Group/ Persons acting concert (PAC) in the Company am presently holding NIL no. of equity shares (0.00% of the total shareholding of the Company) in Demat I was classified as a member of Promoter group/PAC in the Company before the completion of Open Offer in the FY 2021-22.

Since from last 2 years, I am in no way associated to the business or management of the Company. Further I am not engaged in the management of the Company and also do not have any right either to appoint any Director of the Company or an ability to control the management or policy decisions of the Company in any manner whatsoever including by virtue of my shareholding and that none of my acts would influence the decision making in the Company. Accordingly, I request you to reclassify myself from "Promoter Group" category to "Public Category" shareholder.

Further I confirm and undertake the following:

(1) I along with persons related to me together:

(a) I, or along with my immediate relatives do not hold more than 10% of the paid-up equity share capital of the Company;

(b) I, or along with my immediate relatives directly or indirectly, do not exercise control over the affairs of the Company;

- (c) I, or any of my immediate relatives do not have any special rights in the Company through formal or informal arrangements including through any shareholder agreement;
- (d) I, or any of my immediate relatives, do not hold any position of Board of Directors in the company;
- (e) I, or any of my immediate relatives, do not hold any key managerial personnel position in the Company;
- (f) I am not declared as wilful defaulter as per the Reserve bank of India Guidelines;
- (g) No regulatory action is pending against me
- (h) I am not a fugitive economic offender.

(2) There is no pending regulatory action against me.

(3) Further I also confirm that

- (a) I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) at all time from the date of reclassification failing which, I shall be reclassified as promoter group of the Company.
- (b) I shall comply with the conditions mentioned in the sub-clauses (iv), (v) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter group of the Company.

I, request you to take necessary steps for my reclassification from promoter group category to public category shareholder in M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Limited) and also assure you my full cooperation in all the ways during the entire process of reclassification and I will submit the necessary documents if any required by the Statutory Authorities during the process of approval.

Thanking you,

Manjula Mehta

(Manjula Ratilal Mehta)

Apeksha Mehta

4 Sethna House, 13 Laburnam Road, Mumbai - 400 007.

To
23/01/2024
The Board of Directors
M Lakhamsi Industries Ltd
505 Churchgate Chambers,
5 New Marine Lines,
Mumbai, Maharashtra, 400020_

Date:

Sub: Request letter for reclassification from Promoter group to Public category shareholders in M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Ltd.) ("Company") as per Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015

Ref:

- 1) CIN : L51900MH1985PLC034994
- 2) BSE Scrip code : 512153

Dear Sir(s)/Madam(s)

I, Apeksha Mehta , D/o Pradeep Mehta, residing at 4 Sethna House, 13 Laburnam Road, Mumbai -400 007 a member of Promoter Group/ Persons acting concert (PAC) in the Company am presently holding NIL no. of equity shares (0.00% of the total shareholding of the Company) in Demat I was classified as a member of Promoter group/PAC in the Company before the completion of Open Offer in the FY 2021-22.

Since from last 2 years, I am in no way associated to the business or management of the Company. Further I am not engaged in the management of the Company and also do not have any right either to appoint any Director of the Company or an ability to control the management or policy decisions of the Company in any manner whatsoever including by virtue of my shareholding and that none of my acts would influence the decision making in the Company. Accordingly, I request you to reclassify myself from "**Promoter Group**" category to "**Public Category**" shareholder.

Further I confirm and undertake the following:

- (1) I along with persons related to me together:
 - (a) I, or along with my immediate relatives do not hold more than 10% of the paid-up equity share capital of the Company;
 - (b) I, or along with my immediate relatives directly or indirectly, do not exercise control over the affairs of the Company;

- (c) I, or any of my immediate relatives do not have any special rights in the Company through formal or informal arrangements including through any shareholder agreement;
- (d) I, or any of my immediate relatives, do not hold any position of Board of Directors in the company;
- (e) I, or any of my immediate relatives, do not hold any key managerial personnel position in the Company;
- (f) I am not declared as willful defaulter as per the Reserve bank of India Guidelines;
- (g) No regulatory action is pending against me
- (h) I am not a fugitive economic offender.

(2) There is no pending regulatory action against me.

(3) Further I also confirm that

- (a) I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) at all time from the date of reclassification failing which, I shall be reclassified as promoter group of the Company.
- (b) I shall comply with the conditions mentioned in the sub-clauses (iv), (v) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter group of the Company.

I, request you to take necessary steps for my reclassification from promoter group category to public category shareholder in **M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Limited)** and also assure you my full cooperation in all the ways during the entire process of reclassification and I will submit the necessary documents if any required by the Statutory Authorities during the process of approval.

Thanking you,



(Apeksha Mehta)

Dilip DALAL

Arun Building ,4th Floor, 77B Walkeshwar Road, ,Malbar Hill, Mumbai – 400 006

To
The Board of Directors
M Lakhamsi Industries Ltd
505 Churchgate Chambers,
5 New Marine Lines,
Mumbai, Maharashtra, 400020_

Date: 01-02-2024

Sub: Request letter for reclassification from Promoter group to Public category shareholders in M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Ltd.) ("Company") as per Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015

Ref:

- 1) CIN : L51900MH1985PLC034994
2) BSE Scrip code : 512153

Dear Sir(s)/Madam(s)

I, Dilip N. Dalal , residing at Arun Building ,4th Floor, 77B Walkeshwar Road, ,Malbar Hill, Mumbai – 400 06 a member of Promoter Group/ Persons acting concert (PAC) in the Company am presently holding 3500 no. of equity shares of the total shareholding of the Company in Physical I was classified as a member of Promoter group/PAC in the Company before the completion of Open Offer in the FY 2021-22.

Since from last 2 years, I am in no way associated to the business or management of the Company. Further I am not engaged in the management of the Company and also do not have any right either to appoint any Director of the Company or an ability to control the management or policy decisions of the Company in any manner whatsoever including by virtue of my shareholding and that none of my acts would influence the decision making in the Company. Accordingly, I request you to reclassify myself from "**Promoter Group**" category to "**Public Category**" shareholder.

Further I confirm and undertake the following:

(1) I along with persons related to me together:

- (a) I, or along with my immediate relatives do not hold more than 10% of the paid-up equity share capital of the Company;



- (b) I, or along with my immediate relatives directly or indirectly, do not exercise control over the affairs of the Company;
- (c) I, or any of my immediate relatives do not have any special rights in the Company through formal or informal arrangements including through any shareholder agreement;
- (d) I, or any of my immediate relatives, do not hold any position of Board of Directors in the company;
- (e) I, or any of my immediate relatives, do not hold any key managerial personnel position in the Company;
- (f) I am not declared as wilful defaulter as per the Reserve bank of India Guidelines;
- (g) No regulatory action is pending against me
- (h) I am not a fugitive economic offender.

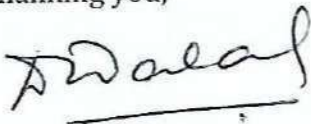
(2) There is no pending regulatory action against me.

(3) Further I also confirm that

- (a) I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) at all time from the date of reclassification failing which, I shall be reclassified as promoter group of the Company.
- (b) I shall comply with the conditions mentioned in the sub-clauses (iv), (v) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015) for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter group of the Company.

I, request you to take necessary steps for my reclassification from promoter group category to public category shareholder in **M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Limited)** and also assure you my full cooperation in all the ways during the entire process of reclassification and I will submit the necessary documents if any required by the Statutory Authorities during the process of approval.

Thanking you,



(Dilip Dalal)

PRADEEP MEHTA

4 Sethna House, 13 Laburnam Road, Gamdevi, Mumbai - 400 007.

To
The Board of Directors

Date: 05/02/2024

M Lakhamsi Industries Ltd
505 Churchgate Chambers,
5 New Marine Lines,
Mumbai, Maharashtra, 400020

Sub: Request letter for reclassification from Promoter group to Public category shareholders in M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Ltd.) ("Company") as per Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015

Ref:

1) CIN : L51900MH1985PLC034994
2) BSE Scrip code : 512153

Dear Sir(s)/Madam(s)

This is to inform you that I am neither engaged in Management decisions nor do I exercise 'control' over the affairs of the Company including the strategic decision-making process of the Company & also my holding is below 10% of the total holding of the company. Therefore, you are hereby requested to kindly re-classify my shareholding from the existing "Promoter Group" to "Public" category in accordance with the provisions of Regulation 31A of SEBI Listing Regulations.

Further I confirm and undertake the following:

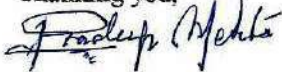
- i. I/We along with 'persons related' to me do not hold more than ten percent of the total voting rights in the company "persons related" as mentioned herein shall have the meaning as defined in Regulation 31A(1)(b) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended).
- ii. I/We do not exercise control over the affairs of the Company directly or indirectly;
- iii. I/We do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements;
- iv. I/We am/are not represented on the Board of Directors (including as a Nominee Director) of the Company;
- v. I/We am/are not acting as a Key Managerial Person in the Company.
- vi. I/We am/are not a 'willful defaulter' as per the Reserve Bank of India Guidelines.
- vii. I/We am/are not a fugitive economic offender.

We further confirm and undertake that in case the requisite approvals are received and we are categorized as "Public" shareholders, then:

- i. I/We shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A (3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 for a period of not less than three years from the date of reclassification (if approved by the shareholders and the Stock Exchanges/ authorities) failing which, I/We shall be reclassified as promoter/person belonging to promoter group of the company.
- ii. I/we am/are not in violation of the restrictions imposed by SEBI under SEBI circular no. SEBI/HO/MRD/DSA/CIR/P/2017/92 dated August 01, 2017.
- iii. I/we am/are not in violation of the provisions of Regulation 24 of the SEBI Delisting Regulations, 2009.

In light of the above, I request the Board of Directors of the Company to consider and take necessary steps to categories me as public shareholder of the Company.

Thanking you,


(Pradeep Mehta)

ANJALI PRADEEP MEHTA

4 Sethna House, 13 Laburnam Road, Gamdevi, Mumbai - 400 007.

To
The Board of Directors

Date: 05/02/2024

M Lakhamsi Industries Ltd
505 Churchgate Chambers,
5 New Marine Lines,
Mumbai, Maharashtra, 400020

Sub: Request letter for reclassification from Promoter group to Public category shareholders in M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Ltd.) ("Company") as per Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015

Ref:

1) CIN : L51900MH1985PLC034994
2) BSE Scrip code : 512153

Dear Sir(s)/Madam(s)

This is to inform you that I am neither engaged in Management decisions nor do I exercise 'control' over the affairs of the Company including the strategic decision-making process of the Company & also my holding is below 10% of the total holding of the company. Therefore, you are hereby requested to kindly re-classify my shareholding from the existing "Promoter Group" to "Public" category in accordance with the provisions of Regulation 31A of SEBI Listing Regulations.

Further I confirm and undertake the following:

- i. I/We along with 'persons related' to me do not hold more than ten percent of the total voting rights in the company "persons related" as mentioned herein shall have the meaning as defined in Regulation 31A(1)(b) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended).
- ii. I/We do not exercise control over the affairs of the Company directly or indirectly;
- iii. I/We do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements;
- iv. I/We am/are not represented on the Board of Directors (including as a Nominee Director) of the Company;
- v. I/We am/are not acting as a Key Managerial Person in the Company.
- vi. I/We am/are not a 'wilful defaulter' as per the Reserve Bank of India Guidelines
- vii. I/We am/are not a fugitive economic offender.

We further confirm and undertake that in case the requisite approvals are received and we are categorised as "Public" shareholders, then:

- i. I/We shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A (3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 for a period of not less than three years from the date of reclassification (if approved by the shareholders and the Stock Exchanges/ authorities) failing which, I/We shall be reclassified as promoter/person belonging to promoter group of the company.
- ii. I/we am/are not in violation of the restrictions imposed by SEBI under SEBI circular no. SEBI/HO/MRD/DSA/CIR/P/2017/92 dated August 01,2017.
- iii. I/we am/are not in violation of the provisions of Regulation 24 of the SEBI Delisting Regulations, 2009.

In light of the above, I request the Board of Directors of the Company to consider and take necessary steps to categories me as public shareholder of the Company.

Thanking you,

Anjali Mehta

(Anjali Pradeep Mehta)

AMIT MEHTA

4 Sethna House, 13 Laburnam Road, Gamdevi, Mumbai - 400 007.

To
The Board of Directors
M Lakhamsi Industries Ltd
505 Churchgate Chambers,
5 New Marine Lines,
Mumbai, Maharashtra, 400020_

Date: 05/02/2024

Sub: Request letter for reclassification from Promoter group to Public category shareholders in M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Ltd.) ("Company") as per Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015

Ref:

- 1) CIN : L51900MH1985PLC034994
2) BSE Scrip code : 512153

Dear Sir(s)/Madam(s)

This is to inform you that I am neither engaged in Management decisions nor do I exercise 'control' over the affairs of the Company including the strategic decision-making process of the Company & also my holding is below 10% of the total holding of the company. Therefore, you are hereby requested to kindly re-classify my shareholding from the existing "Promoter Group" to "Public" category in accordance with the provisions of Regulation 31A of SEBI Listing Regulations.

Further I confirm and undertake the following:

- i. I/We along with 'persons related' to me do not hold more than ten percent of the total voting rights in the company "persons related" as mentioned herein shall have the meaning as defined in Regulation 31A(1)(b) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended).
- ii. I/We do not exercise control over the affairs of the Company directly or indirectly;
- iii. I/We do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements;
- iv. I/We am/are not represented on the Board of Directors (including as a Nominee Director) of the Company;
- v. I/We am/are not acting as a Key Managerial Person in the Company.
- vi. I/We am/are not a 'willful defaulter' as per the Reserve Bank of India Guidelines.
- vii. I/We am/are not a fugitive economic offender.

We further confirm and undertake that in case the requisite approvals are received and we are categorized as "Public" shareholders, then:

- i. I/We shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A (3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 for a period of not less than three years from the date of reclassification (if approved by the shareholders and the Stock Exchanges/ authorities) failing which, I/We shall be reclassified as promoter/person belonging to promoter group of the company.
- ii. I/we am/are not in violation of the restrictions imposed by SEBI under SEBI circular no. SEBI/HO/MRD/DSA/CIR/P/2017/92 dated August 01, 2017.
- iii. I/we am/are not in violation of the provisions of Regulation 24 of the SEBI Delisting Regulations, 2009.

In light of the above, I request the Board of Directors of the Company to consider and take necessary steps to categories me as public shareholder of the Company.

Thanking you,



(Amit Mehta)

To
The Board of Directors
M Lakhamsi Industries Ltd
505 Churchgate Chambers,
5 New Marine Lines,
Mumbai, Maharashtra, 400020

Date: 05/02/2024

Sub: Request letter for reclassification from Promoter group to Public category shareholders in M Lakhamsi Industries Ltd (Formerly known as Specular Marketing & Financing Ltd.) ("Company") as per Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015

Ref:

- 1) CIN : L51900MH1985PLC034994
2) BSE Scrip code : 512153

Dear Sir(s)/Madam(s)

This is to inform you that I am neither engaged in Management decisions nor do I exercise 'control' over the affairs of the Company including the strategic decision-making process of the Company & also my holding is below 10% of the total holding of the company. Therefore, you are hereby requested to kindly re-classify my shareholding from the existing "Promoter Group" to "Public" category in accordance with the provisions of Regulation 31A of SEBI Listing Regulations.

Further I confirm and undertake the following:

- i. I/We along with 'persons related' to me do not hold more than ten percent of the total voting rights in the company "persons related" as mentioned herein shall have the meaning as defined in Regulation 31A(1)(b) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended).
- ii. I/We do not exercise control over the affairs of the Company directly or indirectly;
- iii. I/We do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements;
- iv. I/We am/are not represented on the Board of Directors (including as a Nominee Director) of the Company;
- v. I/We am/are not acting as a Key Managerial Person in the Company.
- vi. I/We am/are not a 'willful defaulter' as per the Reserve Bank of India Guidelines.
- vii. I/We am/are not a fugitive economic offender.

We further confirm and undertake that in case the requisite approvals are received and we are categorized as "Public" shareholders, then:

- i. I/We shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A (3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 for a period of not less than three years from the date of reclassification (if approved by the shareholders and the Stock Exchanges/ authorities) failing which, I/We shall be reclassified as promoter/person belonging to promoter group of the company.
- ii. I/we am/are not in violation of the restrictions imposed by SEBI under SEBI circular no. SEBI/HO/MRD/DSA/CIR/P/2017/92 dated August 01,2017.
- iii. I/we am/are not in violation of the provisions of Regulation 24 of the SEBI Delisting Regulations, 2009.

In light of the above, I request the Board of Directors of the Company to consider and take necessary steps to categories me as public shareholder of the Company.

Thanking you,


(Neil Mehta)