

Lancer Container Lines Ltd.

Date: May 26, 2023

To, BSE Ltd. P.J. Towers, Dalal Street, Mumbai -400 001. Script Code- 539841

Subject: Intimation of receipt of request for reclassification from 'Promoter Group member' category to 'Public' category under Regulation 31A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Ref: - Scrip Code - (LANCER | 539841 | INE359U01028)

Dear Sir/ Madam,

This is to inform that the Company has received request letters cum undertaking from the following Persons belonging to Promoter Group of the Company on 26th May 2023 for reclassifying them from "Promoter Group' to 'Public Category' under regulation 31A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

S.No	NAME OF THE PROMOTER GROUP MEMBERS	NO. OF SHARES HELD	PERCENTAGE OF THE TOTAL EQUITY CAPITAL OF THE COMPANY (%)
1	Ashwamedh Enterprises Private Limited (Represented by Ganesh Kashid or Deepak Kashid)	-	_
2	Deepak L Rajani	_	_
3	Narayanan Kutty Parekattil	48	0.00007%
4	Deepak Gangadhar Sonar	48	0.00007%
	Total	96	0.00014%



who was

Registered Office: Lancer House, Mayuresh Chambers Premises Co-op.Society Ltd, H02, Plot No - 60, Sec-11, CBD Belapur, India 400614 | CIN: L74990MH2011PLC214448 | Website: www.lancerline.com | Email: info@lancerline.com Telephone: +91 22 2756 6940 / 41 / 42 | Fax: +91 22 2756 6939

H.O.: Mumbai, Branch: Nhava Sheva, Mundra, Delhi, Ludhiana, Jaipur, Chennai, Tuticorin, Cochin, Coimbatore, Kolkata, Vizag, Hyderabad and Ahmedabad



Lancer Container Lines Ltd.

We herewith enclose the copy of the request letters received on 26^{th} May 2023 for your kind perusal. Kindly take the same on record.

Thanking you,

Yours sincerely,

On Behalf of Board of Directors

For Lancer Container Lines Limited

Mifi Tailong

Company Secretary & Compliance Officer

Registered Office: Lancer House, Mayuresh Chambers Premises Co-op.Society Ltd, H02, Plot No - 60, Sec-11, CBD Belapur, India 400614 | CIN: £74990MH2011PLC214448 | Website: www.lancerline.com | Email: info@lancerline.com Telephone: +91 22 2756 6940 / 41 / 42 | Fax: +91 22 2756 6939

H.O.: Mumbai, Branch: Nhava Sheva, Mundra, Delhi, Ludhiana, Jaipur, Chennai, Tuticorin, Cochin, Coimbatore, Kolkata, Vizag, Hyderabad and Ahmedabad

ASHWAMEDH ENTERPRISES PVT LTD

Unit no- 14, Anoto Industrial Estate, Nityanand Nagar Ghatkopar (W) Mumbai -400 022.

Ashwamedh.enterprises9@gmail.com

Ref. No.

Date: 26-05-2023

To
The Board of Directors
Lancer Container Lines Limited
Mayuresh Chambers Premises Co-Operative Society Ltd,
Unit No.H02-2, H02-3 & H02-4,
Plot No.60, Sector-11, CBD Belapur,
Navi Mumbai-400614

Dear Sir/ Madam,

SUB: Request for re-classification of Promoter Group members to "Public" category pursuant to Regulation 31A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements)
Regulations, 2015 (as amended) ["SEBI Listing Regulations"]

I Mr. Ganesh Kashid, Director and representative of M/s. Ashwamedh Enterprises Private Limited currently shown as the Promoter of the M/s. Lancer Container Lines Limited would like to state that my latest holding is NIL as per the Depository Statement and the same will also be reflected in the Beneficiary Position Report of the M/s. Lancer Container Lines Limited .

Further to the above transaction, I would request to kindly arrange to Reclassify my status from Promoter to Public Category in compliance with Regulation 31A of SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015

In this matter, if any details or documents required please let me know.

Rationale for request to re-classify:

You are requested to note 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. I am classified as a Promoter Group member merely because I received Equity Shares on Gift basis from an existing Promoter/Promoter Group member of the Company by virtue of provisions of Regulation 31A of SEBI Listing Regulations.

I/We confirm and undertake the following that:

(i) I/We along with 'persons related'to me/us together 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(I)(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;

For ASHWAMEDIN ENTERPRISES PVT. LTD.

Director

ASHWAMEDH ENTERPRISES PVT LTD

Unit no- 14, Anoto Industrial Estate, Nityanand Nagar Ghatkopar (W) Mumbai -400 022.

Ashwamedh.enterprises9@gmail.com

Ref. No.

Date:

- (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 continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of Securities and Exchange Board of India (Listing Obligations (i) and Disclosure Requirements), Regulations, 2015 at all times from the date of re-classification (if approved by the shareholders and the Stock Exchanges/authorities), failing which, I/We shall be reclassified as promoter/person belonging to the promoter group of the company.
- II. 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.
- III. 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
- IV. l/we am/are not in violation of the provisions of Regulation 24 of the SEBI Delisting Regulations, 2009.

Thanking You Yours faithfully For Ashwamedh Enterprises Private Limited

Ganesh Kashid

Director

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DIN: 06474211

ASHWAMEDH ENTERPRISES PVT LTD

Unit no- 14, Anoto Industrial Estate, Nityanand Nagar Ghatkopar (W) Mumbai -400 022. Ashwamedh.enterprises9@gmail.com

Ref. No.

Date:

Undertaking from promoter(s) seeking reclassification

Date: 26-05-2023

The Deputy General Manager, Listing Compliance Monitoring Cell, 24th Floor, P.J. Towers, Dalal Street, Mumbai -400001

Sub: Application for Reclassification under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations (Listing Regulations), 2015

Dear Sir / Madam.

In connection with application for reclassification, I hereby confirm and certify that:

- 1. I along with persons related to me together:
- do not hold more than ten percent of the total voting rights in the company. a)
- do not exercise control over the affairs of the company, directly or indirectly. b)
- do not have any special rights with respect to the company through formal or c)
- informal arrangements including through any shareholder agreements. d)
- e) are not being represented on the board of directors (including not having a
- f) nominee director) of the Company
- do not act as a key managerial person of the Company g)
- h) are not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines
- are not fugitive economic offender i)

FOR ASHWAMEDH ENTERPRISES PVT. U.D.

ASHWAMEDH ENTERPRISES PVT LTD

Unit no- 14, Anoto Industrial Estate, Nityanand Nagar Ghatkopar (W) Mumbai -400 022. Ashwamedh.enterprises9@gmail.com

Ref. No.

Date:

- 2. There is no pending regulatory action against me.
- 3. 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 Obligation and Disclosure Requirements), Regulations, 2015 at all times from the date of re-classification, failing which, I shall be reclassified as promoter/person belonging to the promoter group of the company.
- 4. I 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, failing which, I shall be reclassified as promoter/person belonging to promoter group of the company.

Your's faithfully

For Assirbancian contenenists put lito. SEK-201

Ganesh Kashid

Email -

Ashwamedh.enterprises9@gmail.com

Contact No:- 9322769345

Address:-DEEPAK L RAJANI, BARRACK NUMBER B-46, BHATIA HOSPITAL ROAD, NEAR DR. MADHU LUDHWANI CLINIC, ULHASNAGAR-421005 MH IN

To

Date: 26-05-2023

The Board of Directors

Lancer Container Lines Limited

Mayuresh Chambers Premises Co-Operative Society Ltd, Unit No.H02-2, H02-3 & H02-4, Plot No.60, Sector-11, CBD Belapur,

Dear Sir/ Madam,

Navi Mumbai-400614

SUB: Request for re-classification of Promoter Group members to "Public" category pursuant to Regulation 31A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended) ["SEBI Listing Regulations"]

I Deepak L Rajani currently shown as the Promoter of "Lancer Container Lines Limited" would like to state that my latest holding in the company is NIL as per the Depository Statement and the same will also be reflected in the Beneficiary Position Report of the M/s. Lancer Container Lines Limited.

Further to the above transaction, I would request to kindly arrange to Reclassify my status from Promoter to Public Category in compliance with Regulation 31A of SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015

In this matter, if any details or documents required please let me know.

Rationale for request to re-classify:

You are requested to note 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. I am classified as a Promoter Group member merely because I received Equity Shares on Gift basis from an existing Promoter/Promoter Group member of the Company by virtue of provisions of Regulation 31A of SEBI Listing Regulations.

I/We confirm and undertake the following that:

- (i) I/We along with 'persons related'to me/us together 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(I)(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;

Their

Address:-DEEPAK L RAJANI, BARRACK NUMBER B-46, BHATIA HOSPITAL ROAD, NEAR DR. MADHU LUDHWANI CLINIC, ULHASNAGAR-421005 MH IN

- (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/We shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of Securities and Exchange Board of India (Listing Obligations (i) and Disclosure Requirements), Regulations, 2015 at all times 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 the promoter group of the company.
- II. 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.
- III. 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
- IV. I/we am/are not in violation of the provisions of Regulation 24 of the SEBI Delisting Regulations, 2009.

Thanking You

Yours faithfully

Deepak L Rajani

Address:-DEEPAK L RAJANI, BARRACK NUMBER B-46, BHATIA HOSPITAL ROAD, NEAR DR. MADHU LUDHWANI CLINIC, ULHASNAGAR-421005 MH IN

Undertaking from promoter(s) seeking reclassification

Date: 26-05-2023

To,

The Deputy General Manager, Listing Compliance Monitoring Cell, 24th Floor, P.J. Towers, Dalal Street, Mumbai -400001

Sub: Application for Reclassification under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations (Listing Regulations), 2015

Dear Sir / Madam,

In connection with application for reclassification, I hereby confirm and certify that:

- 1. I along with persons related to me together:
 - a) do not hold more than ten percent of the total voting rights in the company.
 - b) do not exercise control over the affairs of the company, directly or indirectly.
 - c) do not have any special rights with respect to the company through formal or
 - d) informal arrangements including through any shareholder agreements.
 - e) are not being represented on the board of directors (including not having a
 - f) nominee director) of the Company
 - g) do not act as a key managerial person of the Company
 - h) are not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines
 - i) are not fugitive economic offender
- 2. There is no pending regulatory action against me.
- 3. 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 Obligation and Disclosure

A CONTRACTOR OF THE PARTY OF TH

Address:-DEEPAK L RAJANI, BARRACK NUMBER B-46, BHATIA HOSPITAL ROAD, NEAR DR. MADHU LUDHWANI CLINIC, ULHASNAGAR-421005 MH IN

Requirements), Regulations, 2015 at all times from the date of re-classification, failing which, I shall be reclassified as promoter/person belonging to the promoter group of the company.

4. I 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, failing which, I shall be reclassified as promoter/person belonging to promoter group of the company.

Your's faithfully

DEEPAK L RAJANI

Email - dkrdv@yahoo.in

Contact No:- 9324497655

Address:-Flat No 401, Shantinikethan CHS Ltd, Plot No 53/54, Near Vidya Prasarak School, Sector-20, CBD Belapur, Navi Mumbai, Thane, Maharashtra-400614

To

Date: 26th May 2023

The Board of Directors
Lancer Container Lines Limited
Mayuresh Chambers Premises Co-Operative Society Ltd,
Unit No.H02-2, H02-3 & H02-4,
Plot No.60, Sector-11, CBD Belapur,
Navi Mumbai-400614

Dear Sir/ Madam,

SUB: Request for re-classification of Promoter Group members to "Public" category pursuant to Regulation 31A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended) ["SEBI Listing Regulations"]

This is to inform you that consequent to the receipt of 48 (Fourty Eight) Equity Shares of Lancer Container Lines Limited ("the Company"), I have been classified as a member of "Promoter Group" of your Company by virtue of the provisions of Regulation 31A of SEBI Listing Regulations.

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

In this matter, if any details or documents required please let me know.

Rationale for request to re-classify:

You are requested to note 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. I am classified as a Promoter Group member merely because I received Equity Shares on Gift basis from an existing Promoter/Promoter Group member of the Company by virtue of provisions of Regulation 31A of SEBI Listing Regulations.

I/We confirm and undertake the following that:

- (i) I/We along with 'persons related' to me/us together 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(I)(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;



Address:-Flat No 401, Shantinikethan CHS Ltd, Plot No 53/54, Near Vidya Prasarak School, Sector-20, CBD Belapur, Navi Mumbai, Thane, Maharashtra-400614

(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/We shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of Securities and Exchange Board of India (Listing Obligations (i) and Disclosure Requirements), Regulations, 2015 at all times 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 the promoter group of the company.
- II. 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.
- III. 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
- IV. I/we am/are not in violation of the provisions of Regulation 24 of the SEBI Delisting Regulations, 2009.

Thanking You

Yours faithfully

Narayanan Kutty Parekattil

Date: 26th May 2023

Address:-Flat No 401, Shantinikethan CHS Ltd, Plot No 53/54, Near Vidya Prasarak School, Sector-20, CBD Belapur, Navi Mumbai, Thane, Maharashtra400614

Undertaking from promoter(s) seeking reclassification

Date: 26th May 2023

To,
The Deputy General Manager,
Listing Compliance Monitoring Cell,
24th Floor, P.J. Towers,
Dalal Street, Mumbai -400001

Sub: Application for Reclassification under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations (Listing Regulations), 2015

Dear Sir / Madam,

In connection with application for reclassification, I hereby confirm and certify that:

- 1. I along with persons related to me together:
 - a) do not hold more than ten percent of the total voting rights in the company.
 - b) do not exercise control over the affairs of the company, directly or indirectly.
 - c) do not have any special rights with respect to the company through formal or
 - d) informal arrangements including through any shareholder agreements.
 - e) are not being represented on the board of directors (including not having a
 - f) nominee director) of the Company
 - g) do not act as a key managerial person of the Company
 - h) are not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines
 - i) are not fugitive economic offender
- 2. There is no pending regulatory action against me.

Cut !

Address:-Flat No 401, Shantinikethan CHS Ltd, Plot No 53/54, Near Vidya Prasarak School, Sector-20, CBD Belapur, Navi Mumbai, Thane, Maharashtra-400614

- 3. 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 Obligation and Disclosure Requirements), Regulations, 2015 at all times from the date of re-classification, failing which, I shall be reclassified as promoter/person belonging to the promoter group of the company.
- 4. I 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, failing which, I shall be reclassified as promoter/person belonging to promoter group of the company.

Your's faithfully

Narayanan Kutty Parekattil Contact No:-9820620096

Deepak Gangadhar Sonar Address:- BK No. 587 Room No 6/A OT Section Ulhasnagar-2 PIN-421002

To

Date: 26/05/2023

The Board of Directors Lancer Container Lines Limited

Mayuresh Chambers Premises Co-Operative Society Ltd, Unit No.H02-2, H02-3 & H02-4, Plot No.60, Sector-11, CBD Belapur, Navi Mumbai-400614

Dear Sir/ Madam,

SUB: Request for re-classification of Promoter Group members to "Public" category pursuant to Regulation 31A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended) ["SEBI Listing Regulations"]

I Deepak Gangadhar Sonar currently shown as the Promoter of the Company latest holding is 48 Equity Shares as per the Depository Statement and the same is also be reflected in the Beneficiary Position Report of the M/s. Lancer Container Lines Limited.

Further to the above details, I would request to kindly arrange to Reclassify my status from Promoter to Public Category in compliance with Regulation 31A of SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015

In this matter, if any details or documents required please let me know.

Rationale for request to re-classify:

You are requested to note 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. I am classified as a Promoter Group member merely because I purchased Equity Shares from an existing Promoter/Promoter Group member of the Company by virtue of provisions of Regulation 31A of SEBI Listing Regulations.

I/We confirm and undertake the following that:

- (i) I/We along with 'persons related'to me/us together 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(I)(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

Deepak Gangadhar Sonar Address:- BK No. 587 Room No 6/A OT Section Ulhasnagar-2 PIN-421002

(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/We shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of Securities and Exchange Board of India (Listing Obligations (i) and Disclosure Requirements), Regulations, 2015 at all times 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 the promoter group of the company.
- II. 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.
- III. 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
- IV. I/we am/are not in violation of the provisions of Regulation 24 of the SEBI Delisting Regulations, 2009.

Thanking You

Yours faithfully

Bohar.

Deepak Gangadhar Sonar

Deepak Gangadhar Sonar

Address:- BK No. 587 Room No 6/A OT Section Ulhasnagar-2 PIN-421002

Undertaking from promoter(s) seeking reclassification

Date: 26/05/2023

To,
The Deputy General Manager,
Listing Compliance Monitoring Cell,
24th Floor, P.J. Towers,
Dalal Street, Mumbai -400001

Sub: Application for Reclassification under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations (Listing Regulations), 2015

Dear Sir / Madam, In connection with application for reclassification, I hereby confirm and certify that:

- 1. I along with persons related to me together:
 - a) do not hold more than ten percent of the total voting rights in the company.
 - b) do not exercise control over the affairs of the company, directly or indirectly.
 - c) do not have any special rights with respect to the company through formal or
 - d) informal arrangements including through any shareholder agreements.
 - e) are not being represented on the board of directors (including not having a
 - f) nominee director) of the Company
 - g) do not act as a key managerial person of the Company
 - h) are not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines
 - i) are not fugitive economic offender
- 2. There is no pending regulatory action against me.
- 3. 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 Obligation and Disclosure



Deepak Gangadhar Sonar

Address:- BK No. 587 Room No 6/A OT Section Ulhasnagar-2 PIN-421002

Requirements), Regulations, 2015 at all times from the date of re-classification, failing which, I shall be reclassified as promoter/person belonging to the promoter group of the company.

4. I 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, failing which, I shall be reclassified as promoter/person belonging to promoter group of the company.

Your's faithfully



DEEPAK GANGADHAR SONAR Email ddusane@yahoo.com Contact No:-8652578555