MRUGESH TRADING LIMITED

Regd. Off.: 252,Swantraveer Savarkar Rashtriya Smarak,Veer Savarkarmarg, Next to Mayer Banglow, Shivaji Park, Mumbai Mumbai City MH 400028 IN
CIN: L74999MH1984PLC034746, PAN: AAACM2878H
TEL: (91) 2445 9204, FAX: (91) 2445 9205
Website: www.mrugeshtrading.com/ Email: roc@rajdarbarrealty.com

Date: 03.03.2021

To,
BSE Limited,
Listing Compliance Monitoring Cell,
24th Floor, P.J. Towers,
Dalal Street, Mumbai -400001

Sub: Intimation to Stock Exchange about receipt of request from the promoter for Reclassification under Listing Regulation 31A (1) & (2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 and Intimation of Board Meeting to be held on 12th March, 2021.

The Company is in receipt of a request from Mr. Sunil Y. Surve, Bhairav Enterprises Limited, Rishabh Enterprises Limited and Shri Gurudev En-Trade Limited, promoters of the Company, seeking reclassification as public under Regulation 31A (1) & (2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.

In this regard, Please find attached herewith intimation letter along with application received from the promoters of the Company.

The Board Meeting of the Company is scheduled to be held on 12th March, 2021 at 12:00 P.M wherein application will be considered and approved by the Board of Directors of the Company.

We hereby request you to kindly take this into your records.

Yours Faithfully

For Mrugesh Trading Limited

Devendra Kumar Agrawal
Director
DIN: 06752332

3rd March 2021

To, The Board of Directors
Mrugesh Trading Limited
252, Swantraveer Savarkar Rashtriya Smarak,
Veer Savarkarmarg,
Next to Mayer Banglow,
Shivaji Park,
Mumbai 400028

Subject: Request for reclassification under Regulation 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") from the 'Promoter and Promoter Group' category to 'Public' category of Mrugesh Trading Limited ("Company").

1. The shareholders listed in **Annexure A**, collectively referred to as the "**Outgoing Promoters**", hold the relevant number of equity shares of the Company as set out in **Annexure A**. While filing disclosures with BSE Limited ("**Stock Exchange**"), the Company lists the Outgoing Promoters under the category of "Promoter and Promoter Group".

2. In 12th September 2019, the Outgoing Promoters entered into share purchase agreement with Rajdarbar Capital Private Limited and further acquisition by open offer Rajdarbar Capital Private Limited became promoters of the Company in addition to the Outgoing Promoters, in compliance with applicable law.

3. Subsequently, pursuant to the communication of certain other transactions contemplated under the Transaction Documents, the Outgoing Promoters submit that as on the date of this letter, they are not associated with the business of the Company in any manner whatsoever and do not exercise any control over the Company, directly or indirectly, or have any influence over the business and policy decisions made by the Company. Further, the Outgoing Promoters are not involved in the day-to-day activities of the Company. Accordingly, the Outgoing Promoters request that they be reclassified from the 'Promoter and Promoter Group' category to the 'Public' category of shareholders of the Company.

4. It is hereby confirmed that the Outgoing Promoters are eligible for such reclassification as 'public' shareholders and satisfy the conditions set out in regulation 31A of the Listing Regulations and any other applicable law. In accordance with Regulation 31A(3)(b), of the Listing Regulations, the Outgoing Promoters confirm that they and the persons related to them (as defined by sub-clause (i), (ii)and (iii) of sub-clause (pp) of sub-regulation (1) of Regulation 2 of the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018):
    - (i) together, do not hold more than 10 (ten) percent of the total voting rights of Company;
    - (ii) do not exercise control over the affairs of the Company, whether directly or indirectly;
    - (iii) do not have any special rights with respect to the Company through formal or informal arrangements, including through any shareholders agreements.
    - (iv) are not represented any capacity on the Board of Directors of the Company (including through any nominee Directors)
    - (v) are not acting as key Managerial Personnel in the Company.
    - (vi) are not "willful defaulters' as per the Reserve bank of India guidelines; and

(vii) are not fugitive economic offenders

5. The outgoing Promoters also undertake to abide by the conditions listed in Regulation 31A(4) of the Listing Regulations after their reclassification as public shareholders of the Company pursuant to approval of such reclassification by the shareholders of the Company and the Stock Exchange, failing which, they shall automatically be reclassified as promoters /persons belonging to the promoter group, as applicable.

6. The Outgoing promoters request you to consider and approve their application for reclassification from the "Promoter and Promoter Group" category to "Public" category of the shareholders of the Company and place the same before the shareholders of the Company for approval. Further the Outgoing promoters request that the required applications be made to the Stock Exchange to give effect to the reclassification in accordance with Regulation 31A of the Listing Regulations.

Yours Sincerely,

Signed and delivered on behalf of
Sunil Y. Surve

Signed and delivered on behalf of
Shri Gurudev En-Trade Limited
through its authorized signatory

Signed and delivered on behalf of
Bhairav Enterprises Limited
through its authorized signatory

Signed and delivered on behalf of
Rishabh Enterprises Limited
through its authorized signatory

Annexure A

LIST OF OUTGOING PROMOTERS

Equity holding as on 31.12.2020

Sr no	Shareholder	No of Equity shares	Percentage of Equity share capital
1	SUNIL YASHAWANT SURVE	0	0 %
2	BHAIRAV ENTERPRISES LIMITED	0	0 %
3	RISHABH ENTERPRISES LTD	0	0 %
4	SHRI GURUDEV EN TRADE LTD	0	0 %