

SPECULAR MARKETING & FINANCING LTD.

REG. OFFICE: HARI NIVAS, 2ND FLOOR, 26, MAMA PARMANAND MARG, OPERA HOUSE,
MUMBAI - 400004

PHONE: 23682859 EMAIL: specmkt@gmail.com
CIN NO. L51900MH1985PLC034994

Date:- 18.04.2016

To
The Listing Department
Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Fort
Mumbai - 400 001

Scrip Code No. 512153

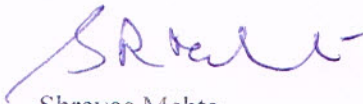
SUB: Clause 31 of the Listing Agreement

REF: Shareholding Pattern of Specular Marketing & Financing Ltd as on 31st March, 2016.

Please find the enclosed share holding pattern of the Company as on 31st March, 2016 as per the specimen given by you as per clause 31 of the Listing Agreement.

Thanking you

Yours faithfully,
For Specular Marketing and Financing Limited



Shreyas Mehta
Compliance Officer

Encl:- As above

Shareholding Pattern under Regulation 31 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

- 1 Name of Listed Entity: **Specular Marketing and Financing Limited**
- 2 Scrip Code/Name of Scrip/Class of Security: **512153 / SPECMKT / EQUITY**
- 3 Share Holding Pattern Filed under: Reg. 31(1)(a)/Reg. 31(1)(b)/Reg.31(1)(c)
 - a. If under 31(1)(b) then indicate the report for Quarter ending : **31st March , 2016**
 - b. If under 31(1)(c) then indicate date of allotment/extinguishment

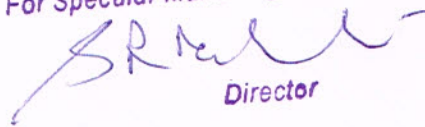
4 Declaration: The Listed entity is required to submit the following declaration to the extent of submission of information:-

Particulars	Yes*	No*
1 Whether the Listed Entity has issued any partly paid up shares?		No
2 Whether the Listed Entity has issued any Convertible Securities or Warrants?		No
3 Whether the Listed Entity has any shares against which depository receipts are issued?		No
4 Whether the Listed Entity has any shares in locked-in?		No
5 Whether any shares held by promoters are pledge or otherwise encumbered?		No

* If the Listed Entity selects the option 'No' for the questions above, the columns for the partly paid up shares, Outstanding Convertible Securities/Warrants, depository receipts, locked-in shares, No of shares pledged or otherwise encumbered by promoters, as applicable, shall not be displayed at the time of dissemination on the Stock Exchange website. Also wherever there is 'No' declared by Listed Entity in above table the values will be considered as 'Zero' by default on submission of the format of holding of specified securities.

5 The tabular format for disclosure of holding of specified securities is as follows:-

For Specular Marketing & Financing Limited


Director

Specular Marketing and Financing Limited
Table I - Summary Statement holding of specified securities

Category (I)	Category of shareholder (II)	Nos of shareholders (III)	No of fully paid-up shares held (IV)	No of Partly paid-up equity shares held (V)	No of shares underlying Depository Receipts (VI)	Total nos. shares held (VII) = (IV)+(V)+(VI)	Shareholding as a % of total no. of shares (VIII) As a % of (A+B+C2)	Number of Voting Rights held in each class of securities (IX)			No of shares Underlying Outstanding convertible securities (Including Warrants) (X)	Shareholding, as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI) = (VII)+(X) As a % of (A+B+C2)	Number of shares pledged or otherwise encumbered (XIII)		Number of equity shares held in dematerialized form (XIV)
								No of Voting Rights	Class Equity	Class Equity			Class Equity	No. (a)	
(A)	Promoter & Promoter Group	20	183250	0	0	183250	73.89	0	183250	100	0	0	0	0	0
(B)	Public	152	64750	0	0	64750	26.11	0	64750	100	0	0	0	0	0
(C)	Non Promoter - Non Public	0	0	0	0	0	0	0	0	0	0	0	0	0	0
(C1)	Shares Underlying DRs	0	0	0	0	0	0	0	0	0	0	0	0	0	0
(C2)	Shares Held By Employee Trust	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total		172	248000	0	0	248000	100	0	248000	100	0	0	0	0	0

For Specular Marketing & Financing Limited

S.R. Reddy
Director

Table II (I)(a)- Statement showing shareholding pattern of the Promoter and Promoter Group

Category & Name of the shareholders (I)	PAN (II)	Nos of share holder (III)	No of fully paid up equity shares held (IV)	Partly paid up equity shares held (V)	No of shares underlying Depository Receipts (VI)	Total nos. shares held (VII) = (IV)+(V)+(VI)	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) As a % of (A)+(B)+(C)+(VIII)	Number of Voting Rights held in each class of securities (IX)			No of shares Underlying convertible securities (including Warrants) (X)	Shareholding, as assuming full conversion of convertible securities (as a diluted share percentage of capital) (XI)=(VII)+(X) as a % of (A)+(B)+(C2)	Number of Locked in shares (XII)		Number of shares pledged or otherwise encumbered (XIII)	As a % of total shares held (b)	Number of equity shares held in dematerialized form (XIV)
								No of Voting Rights		Total			No. (a)	As a % of total shares held (b)			
								Class Equity	Class Equity								
1 Indian																	
Individuals / Hindu Undivided Family																	
(a) Shreyas R Mehta	AAACPM8602L	19	178550	0	0	178550	71.9900	178550	0	178550	0	0.0000	0	0.0000	0	0.0000	0
Ramniklal H Mehta	AAAJE0981E		24300	0	0	24300	9.8	24300	0	24300	0	0	0	0	0	0	0
Bela B Kothari	AADPK9573H		5000	0	0	5000	2.02	5000	0	5000	0	0	0	0	0	0	0
Nilima S Mehta	AAIPM2302F		12200	0	0	12200	4.92	12200	0	12200	0	0	0	0	0	0	0
Pradip R Mehta	AHXP00093R		19000	0	0	19000	7.66	19000	0	19000	0	0	0	0	0	0	0
Amit Ratilal Mehta	AABPM8733F		15650	0	0	15650	6.31	15650	0	15650	0	0	0	0	0	0	0
Satyavati R Mehta	AAHPM3650P		9000	0	0	9000	3.63	9000	0	9000	0	0	0	0	0	0	0
Hiribai Mehta	ZZZZZ9999Z		7000	0	0	7000	2.82	7000	0	7000	0	0	0	0	0	0	0
Manjula Mehta	AAAMP00092J		19450	0	0	19450	7.84	19450	0	19450	0	0	0	0	0	0	0
Santia R Mehta	AAHPM3648P		16050	0	0	16050	6.47	16050	0	16050	0	0	0	0	0	0	0
Anjali Mehta	AABPM7070R		8000	0	0	8000	3.23	8000	0	8000	0	0	0	0	0	0	0
Ashay S Mehta	AFBPM2099H		10000	0	0	10000	4.03	10000	0	10000	0	0	0	0	0	0	0
Leena S Mehta	AGNPM4926G		1050	0	0	1050	0.42	1050	0	1050	0	0	0	0	0	0	0
Nishita S Mehta	AHHPM5561E		5500	0	0	5500	2.22	5500	0	5500	0	0	0	0	0	0	0
Sannir M Mehta	AACPM1418Q		50	0	0	50	0.02	50	0	50	0	0	0	0	0	0	0
Mansi Mehta	ACMPM7853B		50	0	0	50	0.02	50	0	50	0	0	0	0	0	0	0
Neil Mehta	AFJPM8507J		500	0	0	500	0.2	500	0	500	0	0	0	0	0	0	0
Apesha Mehta	AKYPM8582F		500	0	0	500	0.2	500	0	500	0	0	0	0	0	0	0
Dilip N Dallal	AAAGPDI647L		500	0	0	500	0.2	500	0	500	0	0	0	0	0	0	0
Central Government / State Government(s)																	
(b) Government(s)																	
(c) Financial Institutions / Banks																	
(d) Any Other (Specify)																	
Bodies Corporate																	
Rasiklal Hiralal & Co Pvt Ltd	AAACR1854J	1	4700	0	0	4700	1.9000	4700	0	4700	0	0.0000	0	0.0000	0	0.0000	0
Sub Total (A)(I)		20	183250	0	0	183250	73.8900	183250	0	183250	0	0.0000	0	0.0000	0	0.0000	0
2 Foreign																	
Individuals (Non-Resident Individuals / Foreign Individuals)																	
(a) Individuals																	
(b) Government																	
(c) Institutions																	
(d) Foreign Portfolio Investor																	
(e) Any Other (Specify)																	
Sub Total (A)(2)																	
Total Shareholding Of Promoter And Promoter Group (A)=(A)(1)+(A)(2)		20	183250	0	0	183250	73.8900	183250	0	183250	0	0.0000	0	0.0000	0	0.0000	0

Details of Shares which remain unclaimed may be given here along with details such as number of shareholders, outstanding shares held in demat (unclaimed) suspense account, voting rights which are frozen etc

Note:

(1) PAN would not be displayed on website of Stock Exchange(s)

(2) The term 'Encumbrance' has the same meaning as assigned under regulation 28(3) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2009.

Director
For Specular Marketing & Financing Limited

Table III - Statement showing shareholding pattern of the Public shareholder

Category & Name of the shareholders (I)	PAN (II)	Nos of shareholder (III)	No of fully paid-up equity shares held (IV)	Partly paid-up equity shares held (V)	No of shares underlying Depository Receipts (VI)	Total nos. shares held (VII) = (IV)+(V)+(VI)	Shareholding as a % of total no. of shares calculated as per SCRR, 1957 As a % of (A+B+C2) (VIII)	Number of Voting Rights held in each class of securities (IX)		No of shares Underlying Outstanding convertible securities (including Warrants) (X)	Shareholding as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)=(VII)+(X) as a % of (A+B+C2)	Number of shares pledged or otherwise encumbered (XII)		Number of equity shares held in dematerialized form (XIV)
								Class	Equity			No. (a)	As a % of total shares held (b)	
1 Institutions														
(a) Mutual Fund		0	0	0	0	0	0	0	0	0	0	0	0	0
(b) Venture Capital Funds		0	0	0	0	0	0	0	0	0	0	0	0	0
(c) Alternate Investment Funds		0	0	0	0	0	0	0	0	0	0	0	0	0
(d) Foreign Venture Capital Investors		0	0	0	0	0	0	0	0	0	0	0	0	0
(e) Foreign Portfolio Investor		0	0	0	0	0	0	0	0	0	0	0	0	0
(f) Financial Institutions / Banks		0	0	0	0	0	0	0	0	0	0	0	0	0
(g) Insurance Companies		0	0	0	0	0	0	0	0	0	0	0	0	0
(h) Provident Funds/ Pension Funds		0	0	0	0	0	0	0	0	0	0	0	0	0
(i) Any Other (Specify)		0	0	0	0	0	0	0	0	0	0	0	0	0
Sub Total (B)(1)		0	0	0	0	0	0	0	0	0	0	0	0	0
2 Central Government/ State Government(s)/ President of India		0	0	0	0	0	0	0	0	0	0	0	0	0
Sub Total (B)(2)		0	0	0	0	0	0	0	0	0	0	0	0	0
3 Non-Institutions														
(a) Individuals														
i. Individual shareholders holding nominal share capital up to Rs. 2 lakhs.		151	61950	0	0	61950	24.98	61950	0	61950	100	0	0	0
Venu Kalikot	ACFPK4708A		7000	0	0	7000	2.82	7000	0	7000	100	0	0	0
Pradip K. Kothari	ZZZZZ9999Z		4000	0	0	4000	1.61	4000	0	4000	100	0	0	0
Jormal Mehta	ZZZZZ9999Z		4000	0	0	4000	1.61	4000	0	4000	100	0	0	0
Ajay J Mehta	AALPM0177D		4000	0	0	4000	1.61	4000	0	4000	100	0	0	0
Kalpna P. Kothari	ZZZZZ9999Z		4000	0	0	4000	1.61	4000	0	4000	100	0	0	0
Sanjay Doshi	ZZZZZ9999Z		3000	0	0	3000	1.21	3000	0	3000	100	0	0	0
A H Bhimani	ZZZZZ9999Z		10000	0	0	10000	4.03	10000	0	10000	100	0	0	0
ii. Individual shareholders holding nominal share capital in excess of Rs. 2 lakhs.		0	0	0	0	0	0	0	0	0	0	0	0	0
(b) NBFCs registered with RBI		0	0	0	0	0	0	0	0	0	0	0	0	0
(c) Employee Trusts		0	0	0	0	0	0	0	0	0	0	0	0	0
(d) Overseas Depositories (holding DRs) (balancing figure)		0	0	0	0	0	0	0	0	0	0	0	0	0
(e) Any Other (Specify)		0	0	0	0	0	0	0	0	0	0	0	0	0
Hindu Undivided Family		0	0	0	0	0	0	0	0	0	0	0	0	0
Non Resident Indians (Non Repat)		0	0	0	0	0	0	0	0	0	0	0	0	0
Non Resident Indians (Repat)		0	0	0	0	0	0	0	0	0	0	0	0	0
Clearing Member		0	0	0	0	0	0	0	0	0	0	0	0	0
Bodies Corporate		1	2800	0	0	2800	1.13	2800	0	2800	100	0	0	0

For Specular Marketing & Financing Limited

SR Kulkarni
Director

Category & Name of the shareholders (I)	PAN (II)	Nos of shareholder (III)	No of fully paid-up equity shares held (IV)	Partly paid-up equity shares held (V)	No of Depository Receipts (VI)	Total nos. shares held (VII) = (IV)+(V)+(VI)	Shareholding as a % of total no. of shares calculated as per SCRR, 1957) As a % of (A+B+C2) (VIII)	Number of Voting Rights held in each class of securities (IX)			No of shares Underlying convertible securities (including Warrants) (X)	Shareholding as a % assuming full conversion of convertible securities as a percentage of diluted share capital (XI)+(VII)-(X) as a % of (A+B+C2)	Number of shares pledged or otherwise encumbered (XII)		Number of equity shares held in dematerialized form (XIV)		
								No of Voting Rights	% of Total Voting Rights	Total			No. (a)	As a % of total shares held (b)		No. (a)	As a % of total shares held (b)
Lakshadweep Inv & Fin Ltd	ZZZZZ9999Z	1	2800	0	0	2800	1.13	2800	0	2800	100	0	0	0			
Sub Total (B)(3)		152	64750	0	0	64750	26.11	64750	0	64750	100	0	0	0			
Total (B)(1)+(B)(2)+(B)(3)		152	64750	0	0	64750	26.11	64750	0	64750	100	0	0	0			

Details of the shareholders acting as persons in Concert including their Shareholding (No. and %):

Details of Shares which remain unclaimed may be given hear along with details such as number of shareholders, outstanding shares held in demat/unclaimed suspense account, voting rights which are frozen etc.
Note:

(1) PAN would not be displayed on website of Stock Exchange(s).

(2) The above format needs to be disclosed along with the name of following persons: Institutions/Non Institutions holding more than 1% of total number of shares

(3) W.r.t. the information pertaining to Depository Receipts, the same may be disclosed in the respective columns to the extent information available and the balance to be disclosed as held by custodian.

For Specular Marketing & Financing Limited



Director

Table IV - Statement showing shareholding pattern of the Non Promoter- Non Public shareholder

Category & Name of shareholders	PAN	Nos. of shareholders	No. of fully paid up equity shares held	No. of Partly paid-up equity shares held	No. of shares underlying Depository Receipts	Total nos. underlying shares held	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957)	Number of Voting Rights held in each class of securities			No. of Shares Underlying Outstanding convertible securities (including Warrants)	Shareholding as a % assuming full conversion of convertible securities (as a percentage of diluted share capital)	Number of Locked in shares		Number of Shares pledged or otherwise encumbered		Number of equity shares held in dematerialised form
								No of Voting Rights		Total % of (A+B+C)			No. (a)	As a % of total Shares held(b)	No. (a)	As a % of total Shares held(b)	
								Class eg: X	Class eg: y								
(I)	(II)	(III)	(IV)	(V)	(VI)	(VII) = (IV)+(V) + (VI)	(VIII) As a % of (A+B+C2)	(IX)	(X)	(XI) = (VII)+(X) As a % of (A+B+C2)	(XII)	(XIII)	(XIV)				
1 Custodian/DR Holder Employee Benefit Trust (under SEBI (Share based Employee Benefit Regulations, 2014)		0	0	0	0	0	0.0000	0	0	0	0	0	0	0	0	0	0
2 Total Non-Promoter- Non Public Shareholding (C)= (C1)+(C)2		0	0	0	0	0	0.0000	0	0	0	0	0	0	0	0	0	0

Note:

- (1) PAN would not be displayed on website of Stock Exchange(s).
- (2) The above format needs to disclose name of all holders holding more than 1% of total number of shares
- (3) W.r.t. the information pertaining to Depository Receipts, the same may be disclosed in the respective columns to the extent information available

For Specular Marketing & Financing Limited



Director