

Arati Naik

Anugraha, H.No. 22/199, Plot No. 20,
Sagar Co-op housing Society, Nio
Dona Paula, North Goa, Goa 403004

December 09, 2025

To,
The Manager
The Corporate Relationship Department,
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai - 400 001

To,
The Manager - Corporate Compliance
National Stock Exchange of India Limited
"Exchange Plaza", Bandra - Kurla
Complex, Bandra (E),
Mumbai - 400 051

Scrip Code: 532419

Symbol: SMARTLINK

Subject: Off-market Inter-se transfer of Equity Shares between Promoters

Reference: Disclosure under Regulation 10(5) read with 10(1)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 ('SEBI (SAST) Regulations')

In compliance with Regulation 10(5) of SEBI (SAST) Regulations, I, Arati Kamalaksha Naik., Promoter of Smartlink Holdings Limited (hereinafter referred as 'the Company') residing at Anugraha, H. No. 22/199, Plot No. 20, Sagar Co-op housing Society, Nio Dona Paula, North Goa, Goa 403004, hereby wish to inform you that, I propose to acquire by way of Gift, 62,667 Equity Shares carrying 0.63% voting rights of the Company from Mr. Kamalaksha Rama Naik, my father.

The above acquisition is through off-market inter-se transfer between members of the promoter Group (immediate relatives).

Please find enclosed herewith the disclosure under Regulation 10(5) of SEBI (SAST) Regulations in the specified format along with the annexures as required to be given for the said acquisition of Equity Shares of the Company, for your information and record.

You are requested to take the same on record and oblige.

Yours truly,



Arati Naik
(Acquirer)

CC:

The Company Secretary and Compliance Officer
Smartlink Holdings Limited
Address: L-7, Verna Industrial Estate,
Verna, Salcete Goa 403722

Annexure

Format for Disclosures under Regulation 10(5) - Intimation to Stock Exchanges in respect of acquisition under Regulation 10(1)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1.	Name of the Target Company (TC)	Smartlink Holdings Limited
2.	Name of the acquirer(s)	Arati Kamalaksha Naik
3.	Whether the acquirer(s) is/ are promoters of the TC prior to the transaction. If not, nature of relationship or association with the TC or its promoters	Yes, Acquirer belongs to the Promoter Group of the Target Company
4.	Details of the proposed acquisition	
	a. Name of the person(s) from whom shares are to be acquired	Kamalaksha Rama Naik
	b. Proposed date of acquisition	December 15, 2025 to December 30, 2025
	c. Number of shares to be acquired from each person mentioned in 4(a) above	62,667 Equity Shares
	d. Total shares to be acquired as % of share capital of TC	0.63% of the total paid-up Equity Share capital of the Target Company
	e. Price at which shares are proposed to be acquired	Not applicable/ NIL (since acquisition is by way of Gift)
	f. Rationale, if any, for the proposed transfer	Inter-se transfer of shares by way of gift amongst the promoters of the Target Company.
5.	Relevant sub-clause of regulation 10(1)(a) under which the acquirer is exempted from making open offer	Regulation 10(1)(a)(i) of the SEBI (SAST) Regulations.
6.	If, frequently traded, volume weighted average market price for a period of 60 trading days preceding the date of issuance of this notice as traded on the stock exchange where the maximum volume of trading in the shares of the TC are recorded during such period.	Not Applicable
7.	If in-frequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of regulation 8.	Not applicable
8.	Declaration by the acquirer, that the acquisition price would not be higher by more than 25% of the price computed in point 6 or point 7 as applicable.	Not applicable, since acquisition is by way of gift.



9.	<p>i. Declaration by the acquirer, that the transferor and transferee have complied (during 3 years prior to the date of proposed acquisition) / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations, 1997)</p> <p>ii. The aforesaid disclosures made during previous 3 years prior to the date of proposed acquisition to be furnished.</p>	<p>I hereby declare that the transferor and transferee have complied/ will comply with applicable disclosure requirement in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations, 1997).</p> <p>Disclosures made during previous 3 years prior to the date of proposed acquisition are attached as Annexure below.</p>			
10.	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.	It is hereby declared that all the conditions specified under Regulation 10 (1) (a) with respect to exemption has been duly complied with.			
11.	Shareholding details	Before the proposed transaction		After the proposed transaction	
		No. of shares /voting rights	% w.r.t total share capital of TC	No. of shares /voting rights	% w.r.t total share capital of TC
	a Acquirer(s) and PACs (other than sellers)(*)	9,34,833	9.37%	9,97,500	10.00%
	b Seller (s)	49,50,783	49.63%	48,88,116	49.00%

Note:

- (*) Shareholding of each entity may be shown separately and then collectively in a group.
- The above disclosure shall be signed by the acquirer mentioning date & place. In case, there is more than one acquirer, the report shall be signed either by all the persons or by a person duly authorized to do so on behalf of all the acquirers.



Arati Naik
(Acquirer)

Place: Panaji Goa
Date: 09-12-2025

K. R. NAIK

April 05, 2023

To,
The Manager
The Corporate Relationship Department,
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai - 400 001

To,
The Manager - Corporate Compliance
National Stock Exchange of India Limited
"Exchange Plaza", Bandra - Kurla
Complex, Bandra (E),
Mumbai - 400 051

To,
The Chairman – Audit Committee
Smartlink Holdings Limited
L-7, Verna Industrial Estate,
Verna Salcete, Goa – 403722

Ref: Scrip Code: BSE: 532419

NSE: SMARTLINK

Sub: Disclosures under Regulation 31 (4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 for the financial year ended March 31, 2023

Dear Sir,

In terms of Regulation 31(4) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, it is hereby declared and confirmed that I Kamalaksha Rama Naik, promoter of Smartlink Holdings Limited ('Smartlink') and on behalf of the members of the promoter and promoter group along with persons acting in concert, holding 71,15,405 (71.33%) Equity Shares of Smartlink, have not made any encumbrance over the shares held by us in the Company, directly or indirectly, during the financial year ended March 31, 2023.

Kindly take the above information on record and acknowledge the receipt of the same.

Thanking You,

Yours faithfully,


Kamalaksha Rama Naik
(For myself & on behalf of Promoter Group)

CC:
Company Secretary
Smartlink Holdings Limited
L-7, Verna Industrial Estate,
Verna Salcete, Goa – 403722.

Sumati Villa, Sagarika CHS, Juhu Tara Road,
Vile Parle (w), Mumbai, Maharashtra – 400049

K. R. NAIK

April 04, 2024

To,
The Manager
The Corporate Relationship Department,
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai - 400 001

To,
The Manager - Corporate Compliance
National Stock Exchange of India Limited
"Exchange Plaza", Bandra - Kurla
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To,
The Chairman – Audit Committee
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NSE: SMARTLINK

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Yours faithfully,


Kamalaksha Rama Naik
(For myself & on behalf of Promoter Group)

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Company Secretary
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NSE Symbol: SMARTLINK

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