



Ref: D/CTL/SE/2025-26/85

February 10, 2026

To,  
**BSE Limited**  
**P J Towers, Dalal Street,**  
**Fort, Mumbai -400001**

**Scrip Code: 538476****ISIN: INE172D01021****Scrip ID: CTL**

**SUB.: APPLICATION RECEIVED FROM PERSON FALLING UNDER PROMOTER CATEGORY FOR  
RECLASSIFICATION OF HIS STATUS TO PUBLIC CATEGORY UNDER REGULATION 31A  
OF SEBI (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS,  
2015**

**REF.: REGULATION 31A OF THE SEBI (LISTING OBLIGATION AND DISCLOSURE  
REQUIREMENTS) REGULATION, 2015**

Dear Sir/Madam,

Under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company is in receipt of an application from a Person falling under the category of Promoter Category seeking reclassification of his status from "Promoter" category to "Public" category.

The application received from the Promoter is annexed for your reference and record.

Kindly take the information on record.

Thanking you,

**For Capital Trade Links Limited**

**Mehvish**  
**Company Secretary and Compliance Officer**

Annexure – Request letter dated 9<sup>th</sup> February, 2026 from the Person falling under the Promoter Group.

To,  
**The Board of Directors**  
**Capital Trade Links Limited**  
102-103, First Floor, Surya Kiran Building  
19 K.G. Marg, Connaught Place  
New Delhi - 110001

**February 09, 2026**

**Sub- Request Letter for reclassification from Promoter group category to Public category shareholders of Capital Trade Links Limited ("Company")**

**Ref- Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015**

**Dear Sir/Madam,**

**A. Background and Current Status-**

I, **Neeraj Garg**, writing this letter to request you to reclassify me from my current categorization as "Promoter" of Capital Trade Links Limited ("the Company") to Public Shareholder. While filing certain disclosures with the stock exchange, the company classified me under the "Promoter" category as defined by SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018.

I hold an insignificant shareholding of merely 20,000 equity shares of the company, representing 0.02% of the total shareholding of the Company.

**B. Request for Reclassification-**

I have no direct or indirect association with the business or management of the company, and I do not exercise any control over the affairs or decision-making processes of the company. Therefore, I kindly request that you reclassify me from the "Promoter" category to a "Public Category" shareholder of the company.

**C. Undertaking**

In this regard, I hereby confirm and undertake that neither I nor any person related to me:

- a)** hold more than 10% of the total voting rights of the Company;
- b)** exercise control over the affairs of the Company directly or indirectly;
- c)** have any special rights in the Company through formal or informal arrangements including through any shareholder agreement;
- d)** are represented on the Board of Directors (including not having a nominee director) of the company;

- e) are acting as the key managerial personnel of the Company;
- f) are 'willful defaulter' as per the Reserve bank of India Guidelines;
- g) are fugitive economic offender
- h) have any pending regulatory action against us.

*"persons related to the promoter(s) seeking re-classification" shall mean such persons with respect to the promoter seeking re-classification who fall under sub-clauses (ii), (iii) and (iv) of clause (pp) of sub-regulation (1) of regulation 2 of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018.*

I further confirm that:

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

I, request you to take necessary steps for my re-classification from promoter group category to public category shareholder of Capital Trade Links Limited and also assure you my full cooperation in all the ways throughout the entire reclassification process.

Please do the needful, at the earliest possible.

Thanking You,



**Neeraj Garg**  
**(Promoter)**  
**Contact No- 9910086914**  
**Email- neerajgarg73@hotmail.com**