

B-32, Kirti Nagar,  
Ramesh Nagar H.O  
Delhi-110015

The Chief General Manager  
Listing Operation  
BSE Limited  
P J Tower  
Dalal Street  
Mumbai-400001  
Scrip Code: **SMARTFIN | 539494**

Date: 20<sup>th</sup> April, 2023

**Subject: Submission of disclosures under Regulation 10(5) of SEBI (SAST) Regulations, 2011 with respect to proposed inter-se transfer of shares of Smart Finsec Limited.**

Dear sir

This is with reference to the captioned subject, we undersigned being acquirers are enclosing herewith copy of disclosures as required to be filed in terms of Regulation 10(5) of SEBI (SAST) Regulations, 2011 with respect to proposed transfer of shares by way of inter-se transfer in terms of Regulation 10(1)(a)(ii) of SEBI (SAST) Regulations, 2011.

Kindly take the same on your record.

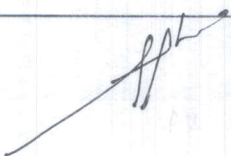
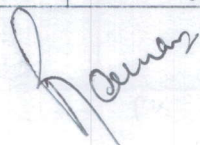
Thanking you

  
(ARUN KHERA)

  
(RAMAN KHERA)

**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**

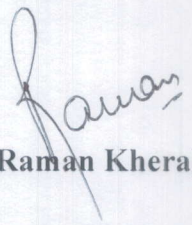
1.	Name of the Target Company (TC)	<b>SMART FINSEC LIMITED</b>	
2.	Name of the acquirer(s)	Mr. Arun Khera and Mr. Raman Khera	
3.	Whether the acquirer(s) is/ are promoters of the TC prior to the transaction. If not, nature of relationship or association with the TC or its promoters	The Acquirers and Sellers have shown as Promoters and Promoter Group of Target Company for last three years prior to the proposed Transactions.	
4.	Details of the proposed acquisition		
	a. Name of the person(s) from whom shares are to be acquired	Mr. Sachit Khera, Ms. Sunaina Khera and Mrs. Upasana Khera	
	b. Proposed date of acquisition	28.04.2023	
	c. Number of shares to be acquired from each person mentioned in 4(a) above	Mr. Sachit Khera Ms. Sunaina Khera Mrs. Upasana Khera <b>Total</b>	4747540 3200000 1283000 <b>9230540</b>
	d. Total shares to be acquired as % of share capital of TC	30.78%	
	e. Price at which shares are proposed to be acquired	Transactions is to be made by way of Gift Deed without any cash consideration.	
	f. Rationale, if any, for the proposed transfer	Inter se transfer among the Promoter and Promoter Group.	
5.	Relevant sub-clause of regulation 10(1)(a) under which the acquirer is exempted from making open offer	10(1)(a)(ii)	
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.	Shares of the company are frequently traded and the price comes to Rs 6.68 per share on the basis of 60 Trading Days Volume Weighted Average Price.	
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(s), that the acquisition price would not be higher by more than 25% of the price computed in point 6 or point 7 as applicable.	Yes The Acquirers hereby declare that the acquisition price would not be higher by more than 25% of the price as determined in terms of clause (b) (c) & (d) of sub regulations (2) of the regulation 8 of the SEBI (SAST) Regulations, 2011 as per point (6) above.	

		Also the acquisition is made by way of gift, hence there shall be no consideration.			
9.	Declaration by the acquirer(s), that the transferor(s) and transferee(s) have complied / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations 1997)	Yes The Acquirers hereby declare that both Transferor(s) and Transferee(s) have complied with the applicable disclosure requirements in Chapter V of the SEBI (SAST) Regulations, 2011.			
10.	Declaration by the acquirer(s) that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.	Yes The Acquirers hereby declare that all the conditions specified under regulation 10 (1) (a) with respect to exemptions 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)(*)				
	1. Mr. Arun Khera	3770000	12.57	8385270	27.95
	2. Mr. Raman Khera	3938000	13.13	8553270	28.51
	<b>Total</b>	<b>7708000</b>	<b>27.57</b>	<b>16938540</b>	<b>56.46</b>
b.	Seller(s)				
	1. Mr. Sachit Khera	5647540	18.83	900000	3.00
	2. Ms. Sunaina Khera	3276020	10.92	76020	0.25
	3. Ms. Upasana Khera	1283000	4.28	Nil	N.A
	<b>Total</b>	<b>10206560</b>	<b>34.03</b>	<b>976020</b>	<b>3.25</b>

**Signatures of the Acquirer(s)**

  
(Arun Khera)

  
(Raman Khera)

Date: 20.04.2023

Place: New Delhi