

18th October, 2019

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

To,
Mr. Hari K- Asst. Vice President
National Stock Exchange of India Ltd
"Exchange Plaza", Bandra - Kurla
Complex, Bandra (E),
Mumbai - 400 051

Scrip Code: BSE: 532419

NSE: SMARTLINK

Sub: Certificate of Compliance under Regulation 40(9) of Securities and Exchange Board of India (LODR) Regulation, 2015

Dear Sir,

Pursuant to Regulation 40(9) of Securities and Exchange Board of India (LODR) Regulation, 2015 (Listing Regulations) enclosed herewith is the Certificate of Compliance for the Company signed by the Practicing Company Secretary for the half year ended 30th September, 2019.

Kindly take note of the same and acknowledge the receipt.

Thanking You

Yours Faithfully,

For SMARTLINK HOLDINGS LIMITED



**URJITA DAMLE
COMPANY SECRETARY**

SMARTLINK HOLDINGS LIMITED

(Formerly known as Smartlink Network Systems Limited)

Registered Office : L-7, Verna Industrial Estate, Verna, Salcete, GA, 403722, IN | Land Phone : +91 832 2885400 | Fax: +91 832 2783395

Corporate Office : 215 Atrium, 2nd Floor, B-Wing, Courtyard Marriott Compound, Andheri-Kurla Road, Andheri (E), Mumbai - 400 093, INDIA

Land Phone : +91 22 3061 6666 / 2652 6696

www.smartlinkholdings.com

**CERTIFICATE UNDER REGULATION 40(9) OF
SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS AND
DISCLOSURE REQUIREMENTS) REGULATIONS, 2015 ('LISTING REGULATIONS')
FOR THE HALF YEAR ENDED SEPTEMBER, 2019.**

I have examined all Share Transfer forms, Memorandum of Transfers, Registers, files and other documents relating to **SMARTLINK HOLDINGS LIMITED** [formerly Smartlink Network Systems Limited] (Company) maintained by Karvy Fintech Private Limited (formerly Karvy Computershare Private Limited) (RTA) pertaining to transfer of equity shares of the company for the period from April 01, 2019 to September 30, 2019 for the purpose of issuing Certificate as per Regulation 40(9) of the SEBI (LODR) Regulations, 2015, by **SMARTLINK HOLDINGS LIMITED** and based on the information provided by the Company, hereby certify that the Company has delivered during the half year ended on September 30, 2019:

- A. Share Certificate(s) relating to the Share Transfer form(s) received during the period from April 01, 2019 to September 30, 2019 as entered in the Memorandum of Transfers have been issued within one month from the respective date of lodgement of each form excepting those rejected on technical grounds [It may be noted that the Listing Regulations was amended vide notification dated 08th June, 2018 to the effect that the transfer of securities would be carried out in dematerialized form only w.e.f. April 01, 2019. Further vide press release dated 27th March, 2019 it was clarified that the transfer deeds lodged prior to deadline and returned due to deficiency in the document may be re-lodged even after the deadline of April 01 2019.]; and
- B. the Company has delivered during half year ended on 30th September, 2019 share certificates in respect of requests relating to issue of duplicate received during the period from April 01, 2019 to September 30, 2019, within thirty days, from the respective date of lodgement excepting those rejected on technical grounds. As per the records made available to us there were no requests for sub-division (split), consolidation and exchange or endorsement of calls/allotment monies during the said period

Place : Panaji, Goa.
Date: October 18, 2019



SHIVARAM BHAT
Practising Company Secretary
CP No. 7853
UDIN : A010454A0001153 28