

March 04, 2023

To,  
The Manager  
The Corporate Relationship Department,  
Bombay Stock Exchange 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

**Sub: Disclosure under regulation 7(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015**

Dear Sir/Madam

Pursuant to Regulation 7(2) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, please find enclosed herewith the disclosure received by the Company in Form 'C'.

Kindly take the same on record.

Thanking You,

Yours faithfully,

For **SMARTLINK HOLDINGS LIMITED**

**URJITA DAMLE**  
**COMPANY SECRETARY**  
**ACS 24654**

Enclosure: Form C

**SMARTLINK HOLDINGS LIMITED**

Registered Office : L-7, Verna Industrial Estate, Verna, Salcete, GA, 403722, IN | Land Phone : +91 832 2885400 | Fax : +91 832 2783395  
investors@smartlinkholdings.com | www.smartlinkholdings.com

Corporate Office : CITIPOINT, 7th Floor, Unit No. B-702, Andheri-Kurla Road, J. B. Nagar, Andheri (East), Mumbai - 400059, INDIA  
Land Phone : +91 22 4961 7068

**FORM C**

**SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7(2) read with Regulation 6(2) – Continual disclosure]**

Name of the Company: SMARTLINK HOLDINGS LIMITED  
ISIN of the Company: INE178C01020

**Details of change in holding of Securities of Promoter, Member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).**

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoter/member of the promoter group/designated person/Directors/immediate relative to/others etc.)	Securities held prior to acquisition/ disposal		Securities acquired/ Disposed			Securities held post-acquisition/ disposal		Date of allotment advice/acquisition of shares/disposal of shares specify		Date of intimation to company (DD/MM/YYYY)	Mode of acquisition /Disposal (on market/ public/ rights/ preferential offer/ off market/ Inter-se transfer, ESOPs, etc.)	Exchange on which the trade was executed	
		Type of Securities (For eg.- Shares, Warrants, Convertible Debentures, Rights entitlements etc.)	No. and % of shareholding	Type of Securities (For eg.- Shares, Warrants, Convertible Debentures, Rights entitlements etc.)	No.	value	Transaction type (Purchase/sale/ Pledge/ Revocation/ Others please specify)	Type of Securities (For eg.- Shares, Warrants, Convertible Debentures, Rights entitlements etc.)	No. and % of shareholding	From (DD/MM/YYYY)				To (DD/MM/YYYY)
Kamalaksha Rama Naik AAAPN9922E Dona Paula Panaji 403004	Promoter & Director	EQUITY SHARES	4690642 - 47.02	EQUITY SHARES	3359	471498.75	Purchase	EQUITY SHARES	4694001 - 47.06	02-03-2023	02-03-2023	04-03-2023	Open Market	NSE


Note:

(I). "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015. (II). Value of transaction excludes taxes/brokerage/any other charges

Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc.)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts* lot size)	Notional Value	Number of units (contracts* lot size)	

Note: In case of Options, notional value shall be calculated based on Premium plus "strike" price of options.

Signature: 

Name : Kamalaksha Rama Naik  
Designation : Promoter & Director  
Date : 04-03-2023  
Place : Mumbai

**FORM C**

**SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]**

Name of the Company: SMARTLINK HOLDINGS LIMITED  
ISIN of the Company: INE178C01020

**Details of change in holding of Securities of Promoter, Member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).**

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoter/member of the promoter group/designated person/Directors/immediate relative to/others etc.)	Securities held prior to acquisition/ disposal		Securities acquired/ Disposed			Securities held post-acquisition/ disposal		Date of allotment advice/acquisition of shares/disposal of shares specify		Date of intimation to company (DD/MM/YYYY)	Mode of acquisition /Disposal (on market/public/ rights/ preferential offer/ off market/ Inter-se transfer, ESOPs, etc.)	Exchange on which the trade was executed	
		Type of Securities (For eg.- Shares, Warrants, Convertible Debentures, Rights entitlements etc.)	No. and % of shareholding	Type of Securities (For eg.- Shares, Warrants, Convertible Debentures, Rights entitlements etc.)	No.	value	Transaction type (Purchase/sale/ Pledge/ Revocation/Invocation/Others please specify)	Type of Securities (For eg.- Shares, Warrants, Convertible Debentures, Rights entitlements etc.)	No. and % of shareholding	From (DD/MM/YYYY)				To (DD/MM/YYYY)
Kamalaksha Rama Naik AAAPN9922E Dona Paula Panaji 403004	Promoter & Director	EQUITY SHARES	4694001 - 47.06	EQUITY SHARES	30149	4427063.40	Purchase	EQUITY SHARES	4724150 - 47.36	03-03-2023	03-03-2023	04-03-2023	Open Market	NSE

Note:

(I). "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015. (II). Value of transaction excludes taxes/brokerage/any other charges

Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc.)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts* lot size)	Notional Value	Number of units (contracts* lot size)	

Note: In case of Options, notional value shall be calculated based on Premium plus "strike" price of options.

Signature: 

Name : Kamalaksha Rama Naik  
Designation : Promoter & Director  
Date : 04-03-2023  
Place : Mumbai