



March 5, 2020

National Stock Exchange of India Ltd.,
Exchange Plaza, C-1, Block G,
Bandra Kurla Complex,
Bandra (E), Mumbai - 400 051

Dear Sir/Madam,

Re: Disclosure under regulation 29(1) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Background of the Company:

CLS Investments, LLC (the "Company") is an investment adviser registered with the United States Securities and Exchange Commission and located at 17605 Wright St, Omaha, Nebraska 68130. Currently, the Company is providing Discretion and Advisory Services to its clients. The Company manages the portfolio of the clients and invests into the companies on behalf of the clients.

SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011:

29.(1) "Any acquirer who acquires shares or voting rights in a target company which taken together with shares or voting rights, if any, held by him and by persons acting in concert with him in such target company, aggregating to five per cent or more of the shares of such target company, shall disclose their aggregate shareholding and voting rights in such target company in such form as may be specified."

29(3) "The disclosures required under sub regulation (1) and sub regulation (2) shall be made within two working days of the receipt of intimation of allotment of shares, or the acquisition of shares or voting rights in the target company to,

- (a) every stock exchange where the shares of the target company are listed; and*
- (b) the target company at its registered office."*

"Definition of persons acting in concert: (Enclosed separately as Annexure 2)"

In view of the above, we hereby submit disclosure in the form required under regulation 29(1) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Kindly take the same on your record and acknowledge receipt of the same.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Forker".

Mike Forker
Chief Compliance Officer
CLS Investments, LLC

Encl: Annexure 1: (Disclosure under regulation 29(1) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.
Annexure 2: Definition of Person Acting in Concert

17605 Wright Street

Omaha, NE 68130

Disclosures under Regulation 29(1) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Part-A- Details of the Acquisition

Name of the Target Company (TC)	Accuracy Shipping Limited		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Acquirer – Massachusetts Institute of Technology PAC - CLS Investments, LLC		
Whether the acquirer belongs to Promoter/Promoter group	No		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	NSE Emerge		
Details of the acquisition as follows	Number	% w.r.t. total share/voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC (**)
Before the acquisition under consideration, holding of acquirer along with PACs of:	a) 1,179,200	7.83%	
a) Shares carrying voting rights	b) 0		
b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	c) 0		NA
c) Voting rights (VR) otherwise than by equity shares	d) 0		NA
d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category)	e) 1,179,200		NA
e) Total (a+b+c+d)			NA
Details of acquisition	a) 214,400		
a) Shares carrying voting rights acquired	b) 0		
b) VRs acquired otherwise than by equity shares	c) 0	1.42%	NA
c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each	d) 0		
	e) 214,400		

category) acquired			
d) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)			NA
e) Total (a+b+c+/-d)			
After the acquisition, holding of acquirer along with PACs of:	a) 1,393,600	9.26%	
a) Shares carrying voting rights	b) 0		NA
b) VRs otherwise than by equity shares	c) 0		NA
c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) after acquisition	d) 0		NA
d) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	e) 1,393,600		NA
e) Total (a+b+c+d)			NA
Mode of acquisition (e.g. open market / public issue / rights issue / preferential allotment / inter-se transfer/encumbrance, etc.)	Open Market		
Salient features of the securities acquired including time till redemption, ratio at which it can be converted into equity shares, etc.	Not applicable.		
Date of acquisition of/ date of receipt of intimation of allotment of shares / VR/ warrants/convertible securities/any other instrument that entitles the acquirer to receive shares in the TC.	3/3/20 – 72,000 shares 3/4/20 – 72,000 shares 3/5/20 – 70,400 shares		
Equity share capital / total voting capital of the TC before the said acquisition	7.83%		
Equity share capital/ total voting capital of the TC after the said acquisition	9.26%		
Total diluted share/voting capital of the TC after the said acquisition	N/A		

Part-B***

Name of the Target Company: Accuracy Shipping Limited

Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Whether the acquirer belongs to Promoter/ Promoter group	PAN of the acquirer and/ or PACs
Acquirer – Massachusetts Institute of Technology	No	N/A
PAC - CLS Investments, LLC	No	N/A

**National Stock Exchange of India Ltd.,
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Bandra (E), Mumbai - 400 051**

Mike Forker
Chief Compliance Officer
CLS Investments, LLC
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Note:

(*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under Clause 35 of the listing Agreement.

(**) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

(***) Part-B shall be disclosed to the Stock Exchanges but shall not be disseminated.