



KELLTON TECH SOLUTIONS LIMITED.

Date January 20, 2021

To
Ms. Charmi Dharod
Manager
National Stock Exchange of India Ltd

Dear Ms. Charmi,

Subject: Clarification letter for Quarterly submission of shareholding pattern for December 31, 2020

Ref: NSE/LIST/30139 dated January 19, 2021

With reference to the above cited subject, this is to inform that the Company had earlier intimated the Stock Exchanges by the way of filing XBRL under Regulation 7(2) of Insider Trading Regulations, regarding the sale of 10,00,000 shares by Kellton Wealth Management LLP (Promoter) on December 24, 2020. (attached Ack for your reference).

Further, as per Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011,

*"Any person, who together with persons acting in concert with him, holds shares or voting rights entitling them to **five per cent or more of the shares or voting rights** in a target company, shall disclose the number of shares or voting rights held and change in shareholding or voting rights, even if such change results in shareholding falling below five per cent, if there has been change in such holdings from the last disclosure made under sub-regulation (1) or under this sub-regulation; and **such change exceeds two per cent of total shareholding or voting rights** in the target company, in such form as may be specified."*

Since the change was of 1.03% shareholding or voting rights, disclosure with respect to above said regulation was not made (attached disclosure for your reference).

Kindly let us know, if any further information is required.

Thanking you,

SURABI JAIN
Digitally signed
by SURABI JAIN
Date: 2021.01.20
17:01:55 +05'30'

Surabi Jain
Company Secretary
M.No: A49557



compliance . <compliance@kelltontech.com>

Insider Trading for Regulation 7(2) - Submitted

1 message

neaps@nse.co.in <neaps@nse.co.in>
To: compliance@kelltontech.com

Tue, Dec 29, 2020 at 3:10 PM

Dear Sir/Madam ,
Disclosure under Regulation 7(2) of Insider Trading bearing Application no - 68082, has been successfully Submitted.

Regards,
National Stock Exchange of India Limited.

Transaction Dates

Format for disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

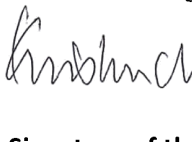
Name of the Target Company (TC)	Kellton Tech Solutions Limited		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Kellton Wealth Management LLP		
Whether the acquirer belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE and NSE		
Details of the acquisition / disposal 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/disposal under consideration, holding of :			
a) Shares carrying voting rights	11933384	12.38%	12.38%
b) Voting rights (VR) otherwise than by equity shares			
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)			
d) Total (a+b+c)	11933384	12.38%	12.38%
Details of acquisition/sale			
a) Shares carrying voting rights acquired/Sold			
b) VRs acquired otherwise than by equity shares	Sold: 1000000	1.03%	1.03%
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) acquired/sold			

Transaction Dates

d) Total (a+b+c)	1000000	1.03%	1.03%
After the acquisition/sale, holding of: a) Shares carrying voting rights b) VRs otherwise than by equity shares 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) Total (a+b+c)	10933384	11.35	11.35
Mode of acquisition/sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc.)	Open Market		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	24th December, 2020		
Equity share capital / total voting capital of the TC before the said acquisition/sale	9,63,82,468 equity shares of Rs. 5 each (Rs. 48,19,12,340/-)		
Equity share capital/ total voting capital of the TC after the said acquisition/sale	9,63,82,468 equity shares of Rs. 5 each (Rs. 48,19,12,340/-)		
Total diluted share/voting capital of the TC after the said acquisition/sale	9,63,82,468 equity shares of Rs. 5 each (Rs. 48,19,12,340/-)		

Note:

(*) 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.




Signature of the acquirer / Seller/ Authorised Signatory

Place: Hyderabad

Date: 29/12/2020

Transaction Dates

S.No	Date of Transaction	Buy/Sell	Amount	Exchange
1.	24.12.2020	Sell	70960000	NSE