



Date: 07th December, 2022

To,
General Manager,
Listing Operation,
BSE Limited,
P.J. Towers, Dalal Street,
Mumbai - 400 001

ISIN: INE904R01027

SYMBOL: HKG

Dear Sir/Ma'am

Subject: Clarification pursuant to Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Dear Sir/Ma'am,

This is with reference to your query received against the application filed under Regulation 31A (10) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 that

How the company is compliant as per the Regulation 31A(8)(c) of SEBI (LODR) Regulations, 2015 with respect to the submission of application for re-classification of status as promoter/ public by the listed entity to the stock exchange and provide the reason for non-compliance.

Our explanation under Regulation 31A (10) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, **In case of reclassification pursuant to an open offer or a scheme of arrangement, the provisions of clause (a) of sub-regulation (3) and clauses (a) and (b) of sub-regulation (8) of this regulation shall not apply if the intent of the erstwhile promoter(s) to reclassify has been disclosed in the letter of offer or scheme of arrangement:**

Provided that the provisions of clause (c) (i) of sub-regulation (3) of this regulation shall not apply in case of reclassification pursuant to an open offer.

In relation to that the erstwhile promoters has already cleared their intention of reclassification pursuant to open offer which has been duly taken on record by SEBI and issued its observation after its due verification and shareholders have already been informed about open offer and its process.



CIN No: L51909MH2010PLC340313

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It is also to be note that since the instant application is under Regulation 31A (10) of SEBI (LODR) Regulations which exempts Regulation 31A 3 (a) of SEBI (LODR) Regulations, which deals with application to stock exchanges, hence in our case, we are of the view that company do not need to submit the application for reclassification. However since as per BSE Checklist available on its portal, deals with application under Regulation 31 A (10) of SEBI (LODR) Regulations as well, hence Company has decided to file an reclassification application to Stock exchange in respect to BSE reclassification checklist

Further we would like to inform you that our company has given all the timely disclosures of all material events as per Regulation 30 of SEBI (LODR) Regulations, 2015.

So, Kindly request you to do not consider the same as non- compliance of Regulation 31A(8)(c) of SEBI (LODR) Regulations, 2015, this was inadvertently done by us.

Further request you to guide us so that we will upload the same with stock exchange if required by your good office.

Yours faithfully,

For HKG Limited



Ankita Gupta

(Company Secretary & Compliance Officer)