

**UNITED STATES SECURITIES AND EXCHANGE COMMISSION**

Washington, D.C. 20549

OMB APPROVAL	
OMB Number:	3235-0104
Estimated average burden hours per response:	0.5

**INITIAL STATEMENT OF BENEFICIAL OWNERSHIP OF SECURITIES**

Filed pursuant to Section 16(a) of the Securities Exchange Act of 1934 or Section 30(h) of the Investment Company Act of 1940

1. Name and Address of Reporting Person* <u>Schroeter Martin J</u> <hr/> (Last) (First) (Middle) <u>ONE VANDERBILT AVENUE, 15TH FLOOR</u> <hr/> (Street) <u>NEW YORK NY 10017</u> <hr/> (City) (State) (Zip)	2. Date of Event Requiring Statement (Month/Day/Year) <u>11/03/2021</u>	3. Issuer Name and Ticker or Trading Symbol <u>Kyndryl Holdings, Inc. [ KD ]</u>	
		4. Relationship of Reporting Person(s) to Issuer (Check all applicable) <input checked="" type="checkbox"/> Director 10% Owner <input checked="" type="checkbox"/> Officer (give title below) Other (specify below) <u>Chief Executive Officer</u>	5. If Amendment, Date of Original Filed (Month/Day/Year)  6. Individual or Joint/Group Filing (Check Applicable Line) <input checked="" type="checkbox"/> Form filed by One Reporting Person <input type="checkbox"/> Form filed by More than One Reporting Person

**Table I - Non-Derivative Securities Beneficially Owned**

1. Title of Security (Instr. 4)	2. Amount of Securities Beneficially Owned (Instr. 4)	3. Ownership Form: Direct (D) or Indirect (I) (Instr. 5)	4. Nature of Indirect Beneficial Ownership (Instr. 5)
---------------------------------	---	--	---

**Table II - Derivative Securities Beneficially Owned (e.g., puts, calls, warrants, options, convertible securities)**

1. Title of Derivative Security (Instr. 4)	2. Date Exercisable and Expiration Date (Month/Day/Year)		3. Title and Amount of Securities Underlying Derivative Security (Instr. 4)	4. Conversion or Exercise Price of Derivative Security	5. Ownership Form: Direct (D) or Indirect (I) (Instr. 5)	6. Nature of Indirect Beneficial Ownership (Instr. 5)
	Date Exercisable	Expiration Date				

Explanation of Responses:

**Remarks:**

[Exhibit 24.1 - Power of Attorney](#)

No securities are beneficially owned.

/s/ Beth Seliga, as attorney-in-fact

11/04/2021

\*\* Signature of Reporting Person

Date

Reminder: Report on a separate line for each class of securities beneficially owned directly or indirectly.

\* If the form is filed by more than one reporting person, see Instruction 5 (b)(v).

\*\* Intentional misstatements or omissions of facts constitute Federal Criminal Violations See 18 U.S.C. 1001 and 15 U.S.C. 78ff(a).

Note: File three copies of this Form, one of which must be manually signed. If space is insufficient, see Instruction 6 for procedure.

Persons who respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB Number.

**Kyndryl Holdings, Inc.**  
One Vanderbilt Avenue 15th Floor  
New York, NY 10017-3852

November 4, 2021

Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549

I hereby authorize each of the following individuals, whose signatures appear below, as well as each of the Kyndryl employees holding the titles of Corporate Secretary; Director, Corporate Compensation; Vice President, Total Rewards; Executive Compensation Leader, Equity & Officer Services; and any employee of Kyndryl designated in writing by the Corporate Secretary of Kyndryl, to sign and file on behalf of Martin Schroeter, executive officer and director of Kyndryl, any Securities and Exchange Commission forms or documents in connection with any transactions by me in Kyndryl securities, including without limitation Form 3, Form 4, and Form 5 under the Securities Exchange Act of 1934 and Form 144 under the Securities Act of 1933. The specimen signatures provided below may be signed on separate documents, and such documents taken together shall constitute a single document.

E. Barth	<u>/s/ E. Barth</u>
C. Buckley	<u>/s/ C. Buckley</u>
M. Westlund	<u>/s/ M. Westlund</u>
B. Seliga	<u>/s/ B. Seliga</u>

This authorization shall remain in effect for as long as I remain an executive officer or director of Kyndryl.

Very truly yours,

Martin Schroeter

/s/ Martin Schroeter

---