

BEFORE THE ADJUDICATING OFFICER
SECURITIES AND EXCHANGE BOARD OF INDIA
ADJUDICATION ORDER NO. EAD/AO/BJD/VS/379/2018-19

**UNDER SECTION 15-I OF SECURITIES AND EXCHANGE BOARD OF INDIA ACT, 1992
READ WITH RULE 5 OF SEBI (PROCEDURE FOR HOLDING INQUIRY AND IMPOSING
PENALTIES BY ADJUDICATING OFFICER) RULES, 1995**

In respect of:

**Nadupalli Sridhar
(PAN: ABNPN2619N)
C/o SANKHYA INFOTECH LTD
Plot No. 8-2-686/DB/19,
Mount View Enclave,
Road No 12, Banjara Hills
Hyderabad – 500 034.**

In the matter of Sankhya Infotech Ltd.

BACKGROUND

1. An examination was conducted into the alleged irregularities in the scrip of Sankhya Infotech Ltd (hereinafter referred to as 'SIL') and the possible violation of the provisions of the Securities and Exchange Board of India Act, 1992 (hereinafter referred to as "SEBI Act, 1992") and various Rules and Regulations made thereunder during the period from August 1, 2014 to January 31, 2015.
2. Upon perusal of the holding and transaction statement of the promoters of the company, it was observed that during the period Aug 2013- Dec 2014 Nadupalli Sridhar (hereinafter referred to as 'Noticee') had inter alia created the pledge of securities and the same was invoked. The details of the aforesaid are as under :

Date	Client Name	Transaction Type	Counterparty Name	No. of shares
8/10/2010	Nadupalli Sridhar	Pledge	Merlin Holdings Pvt Ltd	2,50,000

21/8/2013	Nadupalli Sridhar	Pledge	IDBI Bank Ltd	3,51,300
22/12/2014	Nadupalli Sridhar	Pledge Invoke	IDBI Bank Ltd	3,51,300

3. In view of the creation of pledge on 8/10/2010 as mentioned above, the Noticee was required to make disclosures in terms of Regulation 8A (2) of the SEBI(Substantial Acquisition of Shares and Takeover) Regulations, 2011 (hereinafter referred to as "SAST Regulations, 1997").
4. Further the aforesaid invocation of pledge on December 22, 2014 also required the Noticee to make disclosures under Regulation 29(2), 31(1) & 31(2) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011 (hereinafter referred to as "SAST Regulations, 2011") and Regulations 13(3) & 13(4A) of SEBI (Prohibition of Insider Trading) Act, 1992 (hereinafter referred to as "PIT Regulations, 1992").
5. In view of the above, information was sought from BSE to verify whether necessary disclosures were made by the entities. It was noted that BSE in their reply dated October 1, 2018 *inter alia* submitted the following:

First Holder Name	Date	Description	Quantity	Specify all regulation/s and Sub-regulation/s under which disclosure were received from the entity/company	Date on which disclosure was received by the Exchange (DD/MM/YYYY)
SRIDHAR NADUPALLI (ABNPN2619N)	08/10/2010	Pledge Request	250,000.000	Regulation 8(4) of SEBI (SAST) Regulation 2011	27/9/2018
NADUPALLI SRIDHAR (ABNPN2619N)	27/1/2011	Pledge Closure	351,300.000	Regulation 8(4) of SEBI (SAST) Regulation 2011	27/9/2018
NADUPALLI SRIDHAR	27/8/2013	Pledge, IDBI BANK LIMITE	351,300.000	31(1) and (2) of SEBI (SAST) Regulation 2011	18/10/2016

		D / 137883 30			
NADUPALLI SRIDHAR	22/12/2014	Pledge invocati on, IDBI BANK LIMITE D / 137883 30	351,300.000	31(1) and (2) of SEBI (SAST) Regulation 2011 and 13(4), 13(4A) and 13(6) of SEBI (PIT) Regulation 1992	18/10/2016 & 27/9/2018

6. Further, the company i.e SIL vide its email dated September 27, 2018 submitted the details of Disclosure submitted by the Noticee, from which it was noted that the Noticee has submitted the disclosures with respect to the aforesaid transaction on September 24, 2018.
7. From all of the above, it is alleged that the Noticee has made delayed disclosures under regulation 29(2), 31(1) and regulation 31(2) of SAST Regulations, 2011 and Regulation 8A(2) of SAST Regulations, 1997 and Regulation 13(3) & 13(4A) of PIT Regulations, 1992 and therefore has violated the provisions of regulation 29(2), 31(1) and regulation 31(2) of SAST Regulations, 2011 and Regulation 8A(2) of SAST Regulations, 1997 and Regulation 13(3) & 13(4A) of PIT Regulations, 1992.

APPOINTMENT OF ADJUDICATING OFFICER

8. The undersigned has been appointed as the Adjudicating Officer vide order dated May 16, 2017 under section 15 I of SEBI Act, 1992 to inquire into and adjudge the alleged violation of Regulations 29(2), 31(1) & 31(2) SAST Regulations, 2011, Regulation 8A(2) of SAST Regulations, 1997 and Regulations 13(3) & 13(4A) of PIT Regulations, 1992 by the Noticee in the scrip of SIL.

SHOW CAUSE NOTICE, REPLY AND PERSONAL HEARING

9. A Show Cause Notice dated February 1, 2019 bearing number EAD/BJD/VS/3214/2019 (hereinafter referred to as 'SCN') was issued to the Noticee *inter alia* with respect to the aforesaid allegations mentioned at para above. In response to the same, the Noticee vide his undated letter received on February 28, 2019 acknowledged the receipt of the Notice and sought further time to submit his reply.

10. Further, considering that no reply was received from the Noticee within the time provided as per the SCN and in view of the facts and circumstances of the case, vide Notice dated February 28, 2019, the Noticee was provided with an opportunity of hearing on March 18, 2019 along with another opportunity to submit his reply. In response to the same, the Noticee vide letter dated March 12, 2019 submitted his reply which are dealt in the later part of this Order.

11. Further, Mr. Sarveswar Reddy Sanivarapu along with Mr. Sridhar Krishna (hereinafter referred to as 'ARs') appeared *inter alia* on behalf of the Noticee. During the hearing the ARs reiterated the submissions dated March 12, 2019 and further sought 2 days time to submit documents with respect to Disclosures filed to the Company by the Noticees under SAST Regulations, 2011. The hearing proceedings were concluded therewith. Further, vide email dated March 19, 2019, SIL submitted the disclosures received by SIL under SAST Regulations, 2011 by the Noticee.

CONSIDERATION OF ISSUES AND FINDINGS

12. After perusal of the material available on record, I have the following issues for consideration, viz.,

- I. Whether the Noticee has violated the provisions of regulation 29(2), 31(1) and regulation 31(2) of SAST Regulations, 2011 and Regulation 8A(2) of SAST Regulations, 1997 and Regulation 13(3) & 13(4A) of PIT Regulations, 1992?
- II. Whether the Noticee is liable for monetary penalty under section 15A (b) of the SEBI Act, 1992?
- III. If so, what quantum of monetary penalty should be imposed on the Noticee?

FINDINGS

13. On perusal of the material available on record and giving regard to the facts and circumstances of the case, I record my findings hereunder.

Issue I: Whether the Noticee has violated the provisions of regulation 29(2), 31(1) and regulation 31(2) of SAST Regulations, 2011 and Regulation 8A(2) of SAST Regulations, 1997 and Regulation 13(3) & 13(4A) of PIT Regulations, 1992?

14. From the holding and transaction statement of SIL that is available on record, I note the following transactions involving pledge creation and invocation pertaining to the Noticee:

Date	Client Name	Transaction Type	Counterparty Name	No. of shares
8/10/2010	Nadupalli Sridhar	Pledge	Merlin Holdings Pvt Ltd	2,50,000
21/8/2013	Nadupalli Sridhar	Pledge	IDBI Bank Ltd	3,51,300
22/12/2014	Nadupalli Sridhar	Pledge Invoke	IDBI Bank Ltd	3,51,300

15. From the above, I firstly note that a pledge of 2,50, 000 shares was created on October 8, 2010 by the Noticee in favour of Merlin Holdings Pvt. Ltd. In this regard, it is observed that the Noticee was required to make disclosure under Regulation 8A (2) of the SAST Regulations, 1997. I refer to the provisions of the said regulation which is reproduced hereunder:

Disclosure of Pledged shares

8A. (1)....

(2) A promoter or every person forming part of the promoter group of any company shall, within 7 working days from the date of creation of pledge on shares of that company held by him, inform the details of such pledge of shares to that company

16. I note that it is not in dispute that the Noticee was one of the promoters of SIL at the time of creation of pledge in favour of Merlin Holdings Pvt Ltd on October 8, 2010. Further, I note that in terms of the aforesaid Regulation 8A (2) of SAST Regulations, 1997, the Noticee, on creation of abovementioned pledge was required to inform the details of the pledge within 7 working days. In this regard, I note from the record that SIL vide its email dated September 27, 2018 has submitted the details of disclosures received by it from the Noticee. On perusal of the same, I note that the Noticee has submitted the disclosure to SIL with respect to the aforesaid creation of pledge dated October 8, 2010 on September 24, 2018 under Regulation 8A (2) of SAST Regulations, 1997. From the same, I note that there has been a delayed disclosure with respect to the aforesaid transaction involving pledge creation.
17. Further, I note that the Noticee had created a pledge of 3,51,300 shares in favour of IDBI Bank Limited on August 21, 2013. In this regard, it is observed that the Noticee was required to make disclosure under Regulation 31(1) of the SAST Regulations, 2011. I refer to the provisions of the said regulation which is reproduced hereunder:

Disclosure of encumbered shares

31. (1) *The promoter of every target company shall disclose details of shares in such target company encumbered by him or by persons acting in concert with him in such form as may be specified.*

....

(3) The disclosures required under sub-regulation (1) and sub-regulation (2) shall be made within seven working days from the creation or invocation or release of encumbrance, as the case may be to,-

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

18. While it is not in dispute that the Noticee was one of the promoters of SIL at the time of creation of aforesaid pledge in favour of IDBI Bank Ltd on August 21, 2013, I note that in terms of the aforesaid Regulation 31(1) of SAST Regulations, 2011, the Noticee, on creation of abovementioned pledge was required to submit disclosures with respect to encumbered shares within 7 working days. Further, I refer to email dated March 19, 2019 by SIL, whereby it has *inter alia* submitted the copies of the disclosures under Regulation 31(1) of SAST Regulations, 2011 received from the entity with respect to the invocation of pledge by IDBI Bank Ltd on December 22, 2014. From the same, I note that

the Noticee has submitted the said disclosures to the company on September 28, 2016 with a considerable delay. Further from the email dated October 1, 2018 by BSE, I note that the disclosures are made by the Noticee to BSE as under:

First Holder Name	Date	Description	Quantity	Specify all regulation/s and Sub-regulation/s under which disclosure were received from the entity/company	Date on which disclosure was received by the Exchange (DD/MM/YYYY)
NADUPALLI SRIDHAR	27/8/2013	Pledge, IDBI BANK LIMITED / 137883 30	351,300.000	31(1) and (2) of SEBI (SAST) Regulation 2011	18/10/2016

19. From the same, I conclude that the disclosures under Regulation 31(1) of SAST Regulations, 2011 has been made to exchange with a delay on October 18, 2016.

20. Further I note that 3,51,300 shares pledged by the Noticee in favour of IDBI Bank Limited on August 21, 2013 were later invoked by IDBI Bank on December 22, 2014. With respect to the same, it has been alleged that the Noticee has made delayed disclosure under Regulation 29(2) & 31(2) of SAST Regulations, 2011 and Regulations 13(3) & 13(4A) of PIT Regulations, 1992. I refer to the provisions of the said Regulations which on the date of invocation of pledge by IDBI Bank. Ltd read as under:

SAST Regulations, 2011

Disclosure of acquisition and disposal.

29(2) *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."*

Disclosure of encumbered shares

- 31.** (2) *The promoter of every target company shall disclose details of any invocation of such encumbrance or release of such encumbrance of shares in such form as may be specified*
- (3) *The disclosures required under sub-regulation (1) and sub-regulation (2) shall be made within seven working days from the creation or invocation or release of encumbrance, as the case may be to,-*
- (a) *every stock exchange where the shares of the target company are listed; and*
 - (b) *the target company at its registered office.*

PIT Regulations, 1992

Initial Disclosure

13. (1)...

(3) Any person who holds more than 5% shares or voting rights in any listed company shall disclose to the company in Form C the number of shares or voting rights held and change in shareholding or voting rights, even if such change results in shareholding falling below 5%, 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 2% of total shareholding or voting rights in the company

....

(4A) Any person who is a promoter or part of promoter group of a listed company, shall disclose to the company and the stock exchange where the securities are listed in Form D, the total number of shares or voting rights held and change in shareholding or voting rights, if there has been a change in such holdings of such person from the last disclosure made under Listing Agreement or under sub-regulation (2A) or under this sub-regulation, and the change exceeds Rs. 5 lakh in value or 25,000 shares or 1% of total shareholding or voting rights, whichever is lower.

(5) The disclosure mentioned in sub-regulations (3), (4) and (4A) shall be made within two working days of:

- (a) the receipts of intimation of allotment of shares, or*
- (b) the acquisition or sale of shares or voting rights, as the case may be.*

21. I note that the Regulation 29 of SAST Regulations, 2011 deals with the disclosure requirement in case of acquisition and disposal of shares as arises with respect to the conditions specified in the sub-regulations. Accordingly, Regulation 29(2) stipulates the disclosure requirement on 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 where there has been change exceeding two per cent in his shareholding of his total shareholding or voting rights in the target company

subsequent to the previous disclosure. I note that Regulation 13(3) of PIT Regulations, 1992 also stipulates disclosure requirement in the similar case, the provisions of which has been reproduced above. Further, I note that Regulation 13(4A) of the PIT Regulations, 1992 *inter alia* stipulates disclosure requirement on a promoter where there has been change exceeding Rs. 5 lakh in value or 25,000 shares or 1% in his shareholding of his total shareholding or voting rights in the target company subsequent to the previous disclosure. Further, I also note that Regulation 31(2) of the SAST Regulations, 2011 stipulates requirement to disclose details of any invocation of encumbrance or release of encumbrance of shares to the company and exchange within 7 working days.

22. In the instant case, from the document available on record more particularly on perusal of the Noticee's letter dated September 28, 2016 to SIL which is brought on record before me by the Noticee himself vide his reply dated March 12, 2019, I note that the shareholding of the Noticee in SIL prior to the invocation of pledge by IDBI Bank was 7,62,152 shares amounting to 6.78% and the same came down to 4,10,852 shares amounting to 3.65% pursuant to the invocation of pledge by IDBI. In light of the same, I note that Noticee held more than 5% of shares and there has been a change in Noticee's shareholding in SIL amounting to more than 2% as well as a change amounting to more than 25000 shares pursuant to invocation of pledge. Further, I also take due note of the fact that the Noticee has admitted the alleged pledge creation and subsequent invocation which triggered the disclosure requirement under Regulation 29(2) & 31(2) of SAST Regulations, 2011 and Regulations 13(3) & 13(4A) of PIT Regulations, 1992. Further from the email dated October 1, 2018 by BSE, I note that the aforesaid disclosures are made by the Noticee to BSE as under:

First Holder Name	Date	Description	Quantity	Specify all regulation/s and Sub-regulation/s under which disclosure were received from the entity/company	Date on which disclosure was received by the Exchange (DD/MM/YYYY)
NADUPALLI SRIDHAR	22/12/2014	Pledge invocation, IDBI BANK LIMITED / 13788330	351,300.000	31(1) and (2) of SEBI (SAST) Regulation 2011 and 13(4), 13(4A) and 13(6) of SEBI (PIT) Regulation 1992	18/10/2016 & 27/9/2018

23. In this regard, I also note the submission dated March 12, 2019 of the Noticee with respect to the disclosure filed with the exchange, whereby it has been stated that, "*BSE has taken on record the disclosures filed under SEBI (SAST) Regulations on 18.10.2016. However, the said disclosures were found later removed from its website citing that the same were submitted in the new format as against the required old format. Again, the promoters filed the disclosures in the format as advised by the BSE on 24.09.2018 (N. Sridhar)...The screenshot from BSE website acknowledging the receipt of the disclosures as per SEBI (SAST) Regulations is enclosed...*" Considering the same along with the email dated October 1, 2018 by BSE, I am inclined to opine that the disclosures under PIT Regulations, 1992 to the Exchange was made on October 18, 2016 and the disclosures under Regulation 31(2) of SAST Regulations to the exchange with respect to the pledge invocation was made only on September 24, 2018 both of which amounts to a considerable delay in disclosure.

24. Further, I refer to the email dated September 27, 2018 by SIL whereby it has submitted the disclosures received by it from the Noticee. From the same, I note that the Noticee has submitted disclosures to SIL with respect to the Pledge invocation of pledge and subsequent change in his shareholding under Regulation 13(4) and 13(4A) of the PIT Regulations, 1992 on September 24, 2018 i.e with a considerable delay. Further, I refer to email dated March 19, 2019 by SIL, whereby it has *inter alia* submitted the copies of the disclosures under Regulation 29(2) and 31(2) of SAST Regulations, 2011 received from the entity with respect to the invocation of pledge by IDBI Bank Ltd on December 22, 2014. From the same, I note that the Noticee has submitted the said disclosures to the company on September 28, 2016 with a considerable delay.

25. Further, I note that the Notice in relation to the pledge has submitted, "*The entire amount of loan taken by the promoters was kept utilized towards execution of the identified project but not for personal use.*"

.....

However, the above contract failed to start due to reasons beyond and outside the control of the company and as a result the company suffered a huge cash loss of over f 10 crores. Due to this, our cash flows were stressed and we had a small overdue in servicing our interest. Due to RBI's aggressive pursuit of overdue amounts in banks IDBI has taken unwarranted and drastic steps with regard to our account even though the overdue amount was small

and it was the first time that the company's account has become overdue. Despite IDBI being aware of the reasons for our cash flow problems (as they gave a bank guarantee towards the Govt, project) they have taken coercive steps of transferring our shares on their name. This action was taken by IDBI without any intimation and without any fair and just opportunity for us to defend our case."

26. I note that aforesaid submission does not merit any consideration in favour of the Noticee as the Noticee has admitted the creation of pledge on 2 occasions as mentioned in pre-paras and subsequent invocation of one of the pledges by IDBI. The Noticee was obligated to submit the disclosures as per the requirements of the Regulations he is bound by. In this regard, it is also pertinent to the note the following observation made by Hon'ble Securities Appellate Tribunal (hereinafter referred to as 'SAT') in the matter of Premchand Shah and Others V. SEBI (Appeal no. 108 of 2010 decided on February 21, 2011):

"..... When law prescribes a manner in which a thing is to be done, it must be done only in that manner or not at all."

27. Further, with respect to its default in submitting timely disclosures, the Noticee has submitted, *"we agree that it is an unintentional lapse and was neither deliberate nor willful on our part to comply with the requirement and that there was no malafide intention at any point of time in the failure of disclosure. Also, we have not caused any loss or harm to any investor or society at large. We have not made any undue gain out of the above non-disclosures."* In this regard, I refer to the observation of Hon'ble SAT in the case of Mrs. Komal Nahata vs. SEBI (Appeal No. 5 of 2014 decided on January 27, 2014) *"...Argument that no investor has suffered on account of non disclosure and that the AO has not considered the mitigating factors set out under Section 15J of SEBI Act, 1992 is without any merit because firstly penalty for non compliance of SAST Regulations, 1997 and PIT Regulations, 1992 is not dependent upon the investors actually suffering on account of such non-disclosure. "* Therefore the contention of the Noticee that no loss or harm is caused to any investor due to his default is not tenable.

28. Further, with respect to the submission of the Noticee that the said non-disclosure was unintentional and that no gain was made by her on account of the default, I note the

following observation Made by Hon'ble Securities Appellate Tribunal (SAT) in the matter of Akriti Global Traders Ltd. Vs. SEBI (Appeal No. 78 of 2014 decided on September 30, 2014):

"...Argument of appellant that the delay was unintentional and that the appellant has not gained from such delay and therefore penalty ought not to have been imposed is without any merit, because, firstly, penal liability arises as soon as provisions under the regulations are violated and that penal liability is neither dependent upon intention of parties nor gains accrued from such delay.."

29. Therefore in the facts and circumstances of the instant case, I note that the disclosure requirements were failed to be complied by the Noticee and I am not also inclined to accept the submission of the Noticee with respect to such failure on his part to comply with the provisions of the SAST Regulations and PIT Regulations for the reasons mentioned as above. In view of the foregoing, I conclude that the Noticee has violated the provisions of Regulation 29(2), 31(1) and Regulation 31(2) of SAST Regulations, 2011 and Regulation 8A(2) of SAST Regulations, 1997 and Regulation 13(3) & 13(4A) of PIT Regulations, 1992.

ISSUE II. Whether the Noticee is liable for monetary penalty under Section 15A (b) of the SEBI Act?

30. From the conclusions arrived at para 29 above, I further conclude that the Noticee is liable for monetary penalty under section 15A (b) of the SEBI Act. The text of the said provision is as follows:

Penalty for failure to furnish information, return, etc.-

15A. If any person, who is required under this Act or any rules or regulations made thereunder,-

(a)

(b) to file any return or furnish any information, books or other documents within the time specified therefor in the regulations, fails to file return or furnish the same within the time specified therefor in the regulations, he shall be liable to a penalty *[which shall not be less than one lakh rupees but which may extend to

one lakh rupees for each day during which such failure continues subject to a maximum of one crore rupees];

**Substituted for “of one lakh rupees for each day during which such failure continues or one crore rupees, whichever is less” by the Securities Laws (Amendment) Act, 2014 w.e.f. September 08, 2014.*

ISSUE III: If so, what quantum of monetary penalty should be imposed on the Noticee?

31. While determining the quantum of monetary penalty, it is important to consider the factors stipulated in Section 15 J of the SEBI Act, which reads as under :

SEBI Act

Factors to be taken into account by the adjudicating officer

15J. *While adjudging quantum of penalty under Section 15 I, the adjudicating officer shall have due regard to the following factors, namely:*

- a) the amount of disproportionate gain or unfair advantage, wherever quantifiable, made as a result of the default;*
- b) the amount of loss caused to an investor or a group of investors as a result of the default ;*
- c) the repetitive nature of the default*

32. The material available on record has not quantified the amount of disproportionate gain or unfair advantage, if any, made by the Noticee and the loss, if any, suffered by the investors as a result of the Noticee’s failures. From the documents available on record, it is noted that no prior default is on record.

33. With respect to the conclusion arrived at para 29 above, I also note that Hon’ble SAT in the matter of Vitro Commodities Private Limited Vs. SEBI (Appeal No. 118 of 2013 decided on September 04, 2013) has *inter alia* observed, “It may be noticed that provisions of Regulations 7(1) of Takeover Regulations, 1997 and Regulation 13(1) of PIT Regulations, 1992 are not substantially different, since violation of first automatically triggers violation of second and hence there is no justification for imposition of penalty for second violation when penalty for first violation has been imposed. It may be seen that Regulation 7(1) of Takeover Regulations, 1997 and Regulation 13(1) of PIT Regulations, 1992 are not stand alone Regulations and one is corollary of other”. In light of the

aforesaid Order by Hon'ble SAT, the said ratio is applicable to the facts and circumstances of the instant case with respect to the violation of regulation 29(2) read with regulation 29(3) of SAST Regulations, 2011 and regulation 13(3) of PIT Regulations, 1992 by the Noticee.

ORDER

34. In exercise of the powers conferred under Section 15 I of the Securities and Exchange Board of India Act, 1992, and Rule 5 of Securities and Exchange Board of India (Procedure for Holding Inquiry and Imposing Penalties by Adjudicating Officer) Rules, 1995, I hereby impose a consolidated penalty of ₹3,00,000/- (Rupees Three Lakhs only) on Nadupalli Sridhar in terms of the provisions of Section 15A(b) of the Securities and Exchange Board of India Act, 1992 for the violation of Regulation 29(2), 31(1) and Regulation 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and Regulation 8A(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 1997 and Regulation 13(3) & 13(4A) of SEBI (Prohibition of Insider Trading) Regulations, 1992 by him.
35. Nadupalli Sridhar shall remit / pay the said amount of penalty within 45 days of receipt of this order either through e-payment facility into the Bank Account, the details of which are given below:

Bank Name	State Bank of India
Branch	Bandra-Kurla Complex
RTGS Code	SBIN0004380
Beneficiary Name	SEBI – Penalties Remittable To Government of India
Beneficiary A/c No.	31465271959

or by way of Demand Draft in favour of “SEBI - Penalties Remittable to Government of India”, payable at Mumbai.

36. Nadupalli Sridhar shall forward the following details / confirmation of penalty so paid to the Chief General Manager, Enforcement Department, SEBI Mumbai :

1. Case Name :	
2. Name of Payee:	
3. Date of payment:	
4. Amount Paid:	
5. Transaction No:	
6. Bank Details in which payment is made:	
7.Payment is made for:	Penalty

37. In terms of the provisions of Rule 6 of the Securities and Exchange Board of India (Procedure for Holding Inquiry and Imposing Penalties by Adjudicating Officer) Rules 1995, a copy each of this order is being sent to Nadupalli Sridhar and also to the Securities and Exchange Board of India, Mumbai.

Mumbai
March 20, 2019

B J Dilip
Adjudicating Officer