

BEFORE THE ADJUDICATING OFFICER
THE SECURITIES AND EXCHANGE BOARD OF INDIA, MUMBAI
SETTLEMENT ORDER NO. RA/JP/ 135 /2017

SETTLEMENT ORDER

On the Application No. 3124 of 2016

Submitted by Mudit Finlease Limited

1. Securities and Exchange Board of India (hereinafter referred to as '**SEBI**') has initiated adjudicating proceeding against Mudit Finlease Limited (hereinafter referred to as '**the Applicant / Noticee**') under Section 15HB of the Securities and Exchange Board of India Act, 1992 and Section 23A (a) of Securities Contracts (Regulation) Act, 1956.
2. The undersigned was appointed as Adjudicating Officer (AO) vide order dated January 29, 2016 in the matter.
3. A Show Cause Notice Reference No. E&AO/RA/JP/14902/2016 dated May 24, 2016 (hereinafter referred to as '**SCN**') was issued to the Noticee, wherein it was alleged that the Noticee has violated Clause 3.2-1 & clause 1.2 of the code of conduct specified under Part A of the Schedule I read with regulations 12 (1) and 12(3) and Clause 2.1 of Code of Corporate Disclosure Practices for Prevention of Insider Trading as specified under regulation 12(2) of Schedule II of SEBI (Prohibition of Insider Trading) Regulations, 1992 and Section 21 of the Securities Contracts (Regulation) Act, 1956 read with clause 41(l)(c) of Listing Agreement.
4. While the adjudication proceedings were in progress, the Noticee / Applicant submitted application for settlement of the proceedings, in terms of SEBI

(Settlement of Administrative and Civil Proceedings) Regulations, 2014 (hereinafter referred to as '**Settlement Regulations**').

5. Thereafter, the Noticee had a meeting with the Internal Committee (IC) of SEBI on April 18, 2017 and proposed the settlement terms.
6. The settlement terms as proposed by the Noticee / Applicant were considered by the Internal Committee and placed the same before the High Powered Advisory Committee (HPAC) on May 29, 2017. After considering the facts / circumstance of the case, material brought before it and taking note that the Applicant is agreeable to pay the settlement amount calculated as per Settlement Regulations, the HPAC recommended that the case may be settled on payment of ` 20,40,000/- (Rupees Twenty Lakh Forty Thousand only) towards settlement terms as proposed by the Applicant in accordance with the Settlement Regulations.
7. The recommendation of HPAC were approved by a Panel of the Whole Time Members of SEBI on July 11, 2017 and the same was communicated to the Noticee vide an e-mail dated July 14, 2017. The applicant vide its letter dated July 21, 2017 had submitted a Demand Draft bearing No. 093288 dated July 18, 2017, drawn on Syndicate Bank for ` 20,40,000/- (Rupees Twenty Lakh Forty Thousand only) towards the settlement of actions in the case.
8. Now, in view of the acceptance of the settlement terms as proposed by the Noticee / Applicant and upon receipt of aforesaid Demand Draft by SEBI, the pending adjudication proceedings initiated against the Noticee under the aforesaid SCN dated May 24, 2016, is hereby disposed of in terms of Regulation 15(1) of SEBI Settlement Regulations, 2014.
9. This order is without prejudice to the right of SEBI to initiate enforcement actions including commencing / reopening of the pending proceedings against the Applicant / Noticee, if SEBI finds that:

- i. any representations made by the Applicant in the present settlement proceedings are subsequently discovered to be untrue.
- ii. the Applicant has breached any of the clauses / conditions of undertakings / waivers filed during the present settlement proceedings.

10. This settlement order passed on this 14th day of August, 2017 shall come into force with immediate effect.

11. In terms of Regulation 17 of Settlement Regulations, a copy of this order is being sent to the Applicant / Noticee and for publication on the website of SEBI.

Date: August 14, 2017

Place: Mumbai

RACHNA ANAND
ADJUDICATING OFFICER