

BEFORE THE SECURITIES AND EXCHANGE BOARD OF INDIA

SETTLEMENT ORDER
IN SETTLEMENT APPLICATION NO. 6963 OF 2022
FILED BY PENMETSA SRINIVASA RAJU [PAN: AEHPP6768B]
IN THE MATTER OF ANJANI FOODS LIMITED

1. Mr. Penmetsa Srinivasa Raju (“**Applicant**”) filed a *suo motu* settlement application (“**Application**”) in terms of the SEBI (Settlement Proceedings) Regulations, 2018 (“**Settlement Regulations**”) proposing to settle by neither admitting nor denying the findings of fact and conclusions of law, the enforcement proceedings that may be initiated against him, for the violation of Regulation 7(2)(a) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“**PIT Regulations**”).
2. The Applicant is an independent director of M/s Anjani Foods Limited (“Target Company”). A total of 38,352 equity shares of the Target Company were sold by the Applicant between October 30, 2020 and May 14, 2021. On December 07, 2020, February 16, 2021 and March 16, 2021, the aggregate value of the securities traded by the Applicant were ₹10,04,384.90 (Rupees Ten lakh Four Thousand Three Hundred Eighty Four only), ₹11,22,714.90 (Rupees Eleven Lakh Twenty Two Thousand Seven Hundred and Fourteen only) and ₹21,56,943.85 (Rupees Twenty One Lakh Fifty Six Thousand Nine Hundred and Forty Three only) respectively.
3. As the aggregate value of the securities traded were in excess of ten lakh rupees on December 07, 2020, February 16, 2021 and March 16, 2021, the said transactions were required to be disclosed by the Applicant, to the Company, within two trading days from date of such transaction in accordance with Regulation 7(2)(a) of the PIT Regulations. However, the above stated three transactions were disclosed by the Applicant only on March 01, 2022 with a delay of 447, 376 and 348 days respectively.
4. Pursuant to the receipt of the application, the authorized representatives of the Applicant had a meeting with the Internal Committee of SEBI on December 22, 2022. The Internal Committee deliberated on the aspect of the delayed disclosures and their implications thereof and suggested the terms of the settlement. Thereafter, the Applicant proposed

revised settlement terms dated January 02, 2023 to settle any enforcement proceedings that may be initiated against him.

5. The High Powered Advisory Committee (“**HPAC**”) in its meeting held on January 11, 2023, considered the revised settlement terms proposed by the Applicant and recommended the case for settlement upon payment of ₹3,00,000/- (Rupees Three Lakh only). The Applicant informed about the remittance of the aforesaid settlement amount on February 27, 2023 and SEBI has confirmed credit of the same.
6. On the basis of the facts stated above, in exercise of the powers conferred under Section 15JB read with Section 19 of the Securities and Exchange Board of India Act, 1992 and in terms of Regulations 23 read with Regulation 28 of the Settlement Regulations, it is hereby ordered that the proceedings that may be initiated for the violations as mentioned at paragraph 1 above are settled *qua* the Applicant as per the following terms:
 - i. this Order disposes of the proceedings that may be initiated for the said violations as mentioned above, in respect of the Applicant;
 - ii. SEBI shall not initiate any enforcement action against the Applicant for the said violations, and
 - iii. passing of this Order is however without prejudice to the right of SEBI under Regulation 28 of the Settlement Regulations to initiate appropriate actions against the Applicant, if SEBI finds that:
 - (a) any representation made by the Applicant in the present settlement proceedings is subsequently found to be untrue;
 - (b) the Applicant has breached any of the clauses/ conditions of undertakings/ waivers filed during the present settlement proceedings; and
 - (c) there was a discrepancy while arriving at the settlement terms.
7. This Settlement Order is passed on this 10th day of March, 2023 and shall come into force with immediate effect.
8. In terms of Regulation 25 of the Settlement Regulations, a copy of this Order shall be sent to the Applicant and shall also be published on the website of SEBI.

-Sd/-

ASHWANI BHATIA
WHOLE TIME MEMBER

-Sd/-

ANANTH NARAYAN G.
WHOLE TIME MEMBER

