

BEFORE THE SECURITIES AND EXCHANGE BOARD OF INDIA

SETTLEMENT ORDER

in Settlement Application No.

4109 of 2020 filed by Mr. Chainroop Dugar [PAN: AAFCS9843R]

in the matter of Pearl Polymers Limited

1. Mr. Chainroop Dugar (hereinafter referred to as the 'applicant'), without admitting or denying the findings of fact and conclusions of law, filed a *suo motu* settlement application in terms of the SEBI (Settlement Proceedings) Regulations, 2018 (hereinafter referred to as the 'Settlement Regulations') proposing to settle, through a settlement order, the probable enforcement proceedings for the alleged violation of Regulation 29(1) read with Regulation 29(3) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (hereinafter referred to as the 'SAST Regulations') in respect of the acquisition of shares in Pearl Polymers Limited (hereinafter referred to as the 'Company').
2. On December 05, 2016, the applicant had acquired 7,000 (0.04%) equity shares of the Company, thereby increasing his shareholding from 4.98% to 5.02%, which was required to be disclosed to the Stock Exchanges within 2 working days under Regulation 29(1) read with 29(3) of the SAST Regulations. The same was disclosed only on February 07, 2019, i.e. with a delay of 792 days.
3. Pursuant to the application, the authorized representatives of the applicant had a meeting with the Internal Committee of SEBI on August 18, 2020 and deliberated on the settlement terms. Thereafter, the applicant vide his e-mail dated September 04, 2020, proposed the revised settlement terms to settle the default mentioned above.

4. The High Powered Advisory Committee (hereinafter referred to as the “HPAC”) in its meeting held on September 22, 2020 considered the proposed settlement terms made by the applicant and recommended the case for settlement upon payment of Rs. 3,00,000 /- (Rupees Three Lakh only) towards the settlement terms.
5. The applicant vide UTR No. BKID0000122SRCB0000044 dated September 30, 2020 remitted Rs. 3,00,000/- (Rupees Three Lakh only) towards the settlement terms as proposed by him for the settlement of the proceedings that could have been initiated against him and intimated SEBI vide e-mail dated October 27, 2020. Upon verification, receipt of the above payment was confirmed.
6. In view of the above, in exercise of the powers conferred under Section 15JB 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 have been initiated for the default as mentioned in paragraph 1 be settled *qua* the applicant and as per the following terms:
 - i. SEBI shall not initiate enforcement action against the applicant for the said default;
 - ii. passing of this Order is without prejudice to the right of SEBI to take enforcement actions including commencing proceedings 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.

7. This settlement order is passed on this 20th day of November, 2020 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 also be published on the website of SEBI.

Sd/-

S.K. MOHANTY
WHOLE TIME MEMBER

Sd/-

ANANTA BARUA
WHOLE TIME MEMBER