

SECURITIES AND EXCHANGE BOARD OF INDIA**SETTLEMENT ORDER****IN RESPECT OF**

SETTLEMENT APPLICATION NO.	APPLICANT	PAN NO.
7385/2023	Moneyboxx Capitals Private Limited	AALCM5805B

IN THE MATTER OF MONEYBOXX FINANCE LIMITED

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1. Moneyboxx Capitals Private Limited (hereinafter referred to as “Applicant”) filed a *suo motu* settlement application in terms of the SEBI (Settlement Proceedings) Regulations, 2018 (hereinafter referred to as “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 it for the violation of Clause 2.1 of Code of Conduct of Insider Trading of Moneyboxx Finance Limited (hereinafter referred to as “the Company”) read with the applicable provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“PIT Regulations”), i.e. Clause 4 of the Minimum Standards for Code of Conduct to Regulate, Monitor and Report Trading by Insiders specified in Schedule B read with Regulation 9 of the PIT Regulations.
 2. Brief facts of the case are as follows:
 - 2.1 The Applicant is a promoter of the Company. Vide announcement dated December 30, 2022, the trading window for dealing in securities of the Company was closed from January 01, 2023 till 48 hours after the declaration of the financial results for the quarter ended on December 31, 2022. The unaudited financial results of the Company for quarter ended December 31, 2022 were announced vide announcement dated February 13, 2023.
 - 2.2 During the trading window closure period, i.e. between January 01, 2023 and February 15, 2023, the Applicant had sold 1,91,608 shares of the

Company. The Applicant is stated to have utilized the funds generated from the sale of the shares for redemption of preference shares issued by it and the payment of dividend.

3. In view of the aforesaid facts, the Applicant filed the present application for the purpose of settling the proceedings that may be initiated against it for the aforesaid violations.
4. Pursuant to the receipt of the application, the authorized representatives of the Applicant had a meeting with the Internal Committee of SEBI on October 19, 2023 and November 22, 2023, wherein the issues detailed above were deliberated along with the terms of the settlement. Thereafter, vide email dated November 24, 2023, the Applicant proposed revised settlement terms to settle any enforcement proceedings that may be initiated against it for the violations as stated above at paragraph 1.
5. The High Powered Advisory Committee (hereinafter referred to as “HPAC”) in its meeting held on December 21, 2023 considered the revised settlement terms proposed by the Applicant and recommended the case for settlement upon payment of ₹6,20,000/- (Rupees Six Lakhs Twenty Thousand only). The recommendation of the HPAC was accepted by the Panel of Whole Time Members of SEBI on June 03, 2024. Subsequently, a Notice of Demand for the said amount was issued to the Applicant on June 05, 2024. The Applicant informed about the remittance of the aforesaid settlement amount on June 10, 2024 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 SEBI Act, 1992 and in terms of Regulation 23 of the Settlement Regulations, it is hereby ordered that any proceedings that may be initiated for the violations as mentioned at paragraph 1 above, are settled in respect of the Applicant on the following terms:
 - i. SEBI shall not initiate any enforcement action against the Applicant for the said violations, and

ii. passing of this Order is without prejudice to the right of SEBI under Regulation 28 of the Settlement Regulations to initiate appropriate action 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 19th day of July, 2024 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/-

ANANTH NARAYAN G.
WHOLE TIME MEMBER

Sd/-

AMARJEET SINGH
WHOLE TIME MEMBER