

BEFORE THE APPELLATE AUTHORITY
(Under the Right to Information Act, 2005)
SECURITIES AND EXCHANGE BOARD OF INDIA

Appeal No. 6535 of 2025

Rajat Galav : Appellant

Vs

CPIO, SEBI, Mumbai : Respondent

ORDER

1. The appellant had filed an application dated August 13, 2025 (received by the respondent through RTI MIS Portal) under the Right to Information Act, 2005 (“**RTI Act**”). The respondent, by a letter dated August 25, 2025, responded to the application filed by the appellant. The appellant filed an appeal (Reg. No. SEBIH/A/E/25/00227) dated August 26, 2025. I have carefully considered the application, the response and the appeal and find that the matter can be decided based on the material available on record.
2. The appellant has filed appeal only against the response of the respondent to query nos. 1 and 4 in the application.
3. **Query nos. 1 & 4 in the application** - The appellant, vide query nos. 1 & 4, sought the following information:

“On 9 April 2025, SEBI formed a six member high level committee on conflict of interest and related matters in respect of SEBI board members. As per RTI act 2005, kindly furnish the following information via email only :

1) Kindly mention the remuneration being given to each of the 6 members of this expert committee for the purpose of preparing and submitting their report to SEBI.

4) Kindly mention the revised date, on which this expert committee plans to submit its report to SEBI.

RTI act 2005 mandates CPIOs to furnish information within 30 days, thus I am expecting SEBI to give me an emailed reply on or before 13.09.2025”

4. **Reply of the Respondent** –The respondent, in response to query no. 1 in the application, informed that SEBI is not paying any remuneration to the members of the High Level Committee constituted to look in to matters relating to conflict of interest disclosures and other related matters in respect of members and officials of the Board. However, respondent has also informed that token amount is paid to the members as honorarium for attending committee meetings.

The respondent, in response to query no. 4, informed that the query is in the nature of seeking clarification/opinion/justification. Accordingly, the same cannot be construed as "information", as defined u/s 2(f) of the RTI Act.

5. **Ground of appeal** – The appellant has filed the appeal on the ground that he was refused access to information requested.
6. I have perused the application and the response provided thereto. With regard to query no. 1, the appellant, in his appeal, has requested information on the exact token amount given per meeting and total expenditure on the Committee till date. I note that this request is in the nature of seeking further clarification based on the respondent's reply. Hence, I find that the appellant is seeking additional information pertaining to his query. As held by the Hon'ble Central Information Commission in *Harish Prasad Divedi vs. Bharat Petroleum Corporation Ltd.* (decided on January 28, 2014), an information seeker cannot be allowed to expand the scope of his RTI enquiry at appeal stage. Therefore, I find that the said submissions do not warrant consideration at this stage.
7. With regard to query no. 2, I concur with the response of the respondent that the same are in the nature of seeking clarification/opinion/justification from the respondent. I find that the said query cannot be construed as seeking 'information' as defined under section 2(f) of the RTI Act. Consequently, the respondent did not have an obligation to provide such clarification or opinion or justification under the RTI Act. In this context, reliance is placed on matter of *Azad Singh vs. CPIO, Oriental Insurance Company Limited* (order dated March 23, 2021) wherein Hon'ble Central Information Commission(CIC) observed that “7. The Commission, after hearing the submissions of both the parties and after perusal of records, observed that some queries of the appellant are in the nature of seeking explanation/ opinion/ advice/ confirmation/ clarification from the CPIO and he has expected that the CPIO firstly should analyze the documents and then provide information to the appellant. But the CPIO is not supposed to create information; or to interpret information; or to compile information as per the desire of the appellant under the ambit of the RTI Act. As per Section 2(f) of the RTI Act, the reasons/ opinions/ advices can only be provided to the applicants if it is available on record of the public authority. The CPIO cannot create information in the

manner as sought by the appellant. The CPIO is only a communicator of information based on the records held in the office and hence, he cannot be expected to do research work to deduce anything from the material therein and then supply it to him.”

Accordingly, I do not find any deficiency in the response of the respondent.

8. In view of the above observations, I find that there is no need to interfere with the decision of the respondent. The appeal is accordingly dismissed

Place: Mumbai

Date: September 23, 2025

RUCHI CHOJER

**APPELLATE AUTHORITY UNDER THE RTI ACT
SECURITIES AND EXCHANGE BOARD OF INDIA**