SO/EFD-2/2024-25/5-6

SECURITIES AND EXCHANGE BOARD OF INDIA

SETTLEMENT ORDER
IN RESPECT OF SUMMARY SETTLEMENT APPLICATIONS

Summary Settlement Application Number	Name of the Applicant	PAN
SS-5/2024	Ravi Dalmia	AEAPD9821J
SS-6/2024	Shashi Dalmia	AACPD7648F

IN THE MATTER OF ECO HOTELS AND RESORTS LIMITED (FORMERLY KNOWN AS SHARAD FIBRES AND YARN PROCESSORS LIMITED)

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1. Securities and Exchange Board of India ("**SEBI**") has prima facie, observed that the erstwhile promoters of Eco Hotels and Resorts Limited ("**Target Company**"), viz. Mr. Ravi Dalmia and Mr. Shashi Dalmia, [hereinafter collectively referred to as "**the Applicants**"] have violated the provisions of Regulation 29(2) read with Regulation 29(3) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 ("**Takeover Regulations**").

2. It was observed that on July 4, 2017 pursuant to acquisition of 1,67,650 equity shares by Mr. Ravi Dalmia , his total shareholding increased from 15.53% to 19.72%. Further, on July 4, 2017 pursuant to acquisition of 1,67,650 equity shares by Mr. Shashi Dalmia, his total shareholding increased from 15.53% to 19.72%. It was noted that the above transactions triggered disclosure requirement under Regulation 29(2) read with Regulation 29(3) of the

Takeover Regulations. It was observed that the said disclosures were made to the stock exchange only on December 16, 2023 with a delay of 2,719 days.

3. In terms of Regulation 16 of the Securities and Exchange Board of India (Settlement Proceedings) Regulations, 2018 (hereinafter referred to as "**Settlement Regulations**"), SEBI issued a 'Notice of Summary Settlement' dated February 20, 2024 (hereinafter referred to as the "**Notice**") to the Applicants intimating them that proceedings under Section 15A(b) of SEBI Act, 1992, may be initiated for the aforesaid violations, and that in case the Applicants wished to settle the aforesaid proceedings to be initiated they would be required to file an application under the Settlement Regulations along with remittance of the settlement amount of ₹8,44,625/-/- (Rupees Eight lakh forty-four thousand six hundred and twenty-five only), in terms of Regulation 16(3)(b) of the Settlement Regulations, within 30 calendar days from the date of receipt of the Notice in terms of Chapter VII of the Settlement Regulations.

4. In response to the same, the Applicants filed settlement applications on March 18, 2024 proposing to settle the enforcement proceedings that may be initiated against them for the violation of the provisions of the Takeover Regulations, mentioned in paragraph 1 above, through a settlement order and remitted the settlement amount of ₹8,44,625/-/- (Rupees Eight lakh forty-four thousand six hundred and twenty-five only) on April 5, 2024. SEBI has confirmed credit of the said amount.

5. 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 Regulations 23 of the Settlement Regulations, the specified proceedings, in

respect of which the Notice was issued, are hereby settled in respect of the Applicants on the following terms:

i. SEBI shall not initiate any enforcement action against the Applicants for the said violations, and

ii. passing of this Settlement Order is without prejudice to the right of SEBI under Regulation 28 of the Settlement Regulations to initiate appropriate action against the Applicants, if SEBI finds that:

(a) any representation made by the Applicants in the present settlement proceedings is subsequently found to be untrue;

(b) the Applicants have breached any of the clauses/ conditions of undertakings/ waivers filed during the present settlement proceedings; and

(c) there is a discrepancy while arriving at the settlement terms.

6. This Settlement Order is passed on this 18th day of June, 2024 and shall come into force with immediate effect.

7. In terms of Regulation 25 of the Settlement Regulations, a copy of this Order shall be sent to the Applicants and shall also be published on the website of SEBI.

KAMLESH C. VARSHNEY
WHOLE TIME MEMBER

AMARJEET SINGH
WHOLE TIME MEMBER