**CERTIFICATE No. 6364 of 2023**

**Certificate under Section 28A of Securities and Exchange Board of India Act, 1992 read with section 222 of the Income-tax Act, 1961**

| | |
|---|---|
| **Dolphin Universal Rural Development Limited**<br><br>**(PAN: AAECD1060C)**<br><br>**Address 1**: Udaygiri Apartment, Ground Floor, Dainik Bhaskar Lane, P S Jayenendraganj, Gwalior, Madhya Pradesh – 474002<br><br>**Address 2**: 46/31/1 Garihat Road, 4th Floor, Ballygunge C Market, Kolkata, West Bengal – 700029<br><br>**Address 3:** C/o Arvind Singh Gurjer Vill and PO Itawal, Morena, Madhya Pradesh – 476221<br><br>**Address 4**: Baradeeh Chowk, Mukhtiyar Gang, Rana Krishna Ashram, Satna, Madhya Pradesh - 485001 | **Shri Subham Bose**<br><br>**(PAN: AFUPB9577J)**<br><br>**Address 1:** S/o Deboasad Bose, 47/1, Selimpur, Lanedakhuria Kasba, Kolkata, West Bengal – 700031<br><br>**Address 2**: 22A, Gora Chand Road, Kolkata – 700014<br><br>**Address 3**: Flat 19F, South City Tower, 375 Prince Anwar Shah Road, Kolkata - 700068 |
| **Shri Anindyo Paul**<br><br>**(PAN: BYZPP3573J)**<br><br>**Address 1**: S/o Radharam Paul, 162/A, Motilal Nehru Road, Kolkata, West Bengal – 700029<br><br>**Address 2**: 8/6 Kasundi, 2nd Bylane, Anjali Apartment, Horah – 711104<br><br>**Address 3**: 46/31/1 Leela Roy Sarani, 4th Floor, Kolkata - 700029 | **Shri Koshik Dutta**<br><br>**(PAN: NA)**<br><br>**Address**: S/o Ashish Dutta, B/135, Sonali Park, Bansdroni, Kolkata, West Bengal – 700070 |
| **Shri Debraj Mitra**<br><br>**(PAN: NA)**<br><br>**Address**: S/o Prabir Kumar Mitra, Part No. 154, North 24 Parganas, Barackpur, WB - 700085 | **Shri Saugata Basu**<br><br>**(PAN: AFUPB7369C)**<br><br>**Address:** S/o Sanat Kumar Basu, 44A, Kabi Sukanta Sarani, Kolkata, WB-700085 |
| **Shri Rana Sikadar (PAN:NA)**<br><br>**Address:** S/o Dulal Sikdar, 23/9 Anjan Garh, Bishar Para, Birati, North 24 Parganas, WB-700051 | |

**NOTICE OF DEMAND UNDER RULE 2 OF THE SECOND SCHEDULE TO THE INCOME-TAX ACT, 1961 READ WITH SECTION 28A OF THE SECURITIES AND EXCHANGE BOARD OF INDIA ACT, 1992.**

1. A Notice of Demand dated 28.03.2023 was issued to you for the recovery of an amount of Rs. 2,31,53,440/- (Two Crore Thirty-One Lakh Fifty-Three Thousand and Four Hundred Forty only) wherein the interest calculated was incorrect..

2. This is to certify that a sum of **Rs. 2,99,46,456.71/- (Rupees Two Crore Ninety-Nine Lakhs Forty-Six Thousand Four Hundred Fifty-Six and Paise Seventy-one only)** along with further interest, all costs, charges and expenses incurred in respect of all the proceedings taken for recovery of the said sum as detailed below is due to SEBI from you:

| **Description of Dues** | **Amount (Rs.)** |
|---|---|
| Amount directed to be refunded by WTM vide Order No. WTM/RKA/EFD/164/2016 dated 27.10.2016 in the matter of Dolphin Universal Rural Development | 99,79,500/- (79,11,500+20,68,000) |
| Interest on Rs. 79,11,500/- from 01.04.2012 to 14.10.2025 @ 15% p.a. | 1,60,74,433/- |
| Interest on Rs. 20,68,000/- from 01.04.2013 to 14.10.2025 @ 15% p.a. | 38,91,522.74/- |
| Recovery Cost | 1,000/- |
| **Total** | 2,99,46,456.71/- |

3. You are hereby directed to pay the total amount as mentioned above within 15 (Fifteen) days of the receipt of this Notice by way of direct credit through **EFT/NEFT/RTGS to A/c No. SEBIRNCIS6364 of Bank of India, IFSC code – BKID00VAN04) (OR) online payment facility available on the "Recovery Payment" module on the website: https://siportal.sebi.gov.in (OR) payment link available on the following path: SEBI Website → Enforcement → Recovery Proceedings → Pay Now)** failing which the Recovery Officer shall proceed to recover the amount due in accordance with the provisions of **Section 28A of Securities and Exchange Board of India Act, 1992 ("SEBI Act")** read with sections 220 to 227, 228A, 229 and 232 of the Income-tax Act, 1961 and the Second Schedule to the said Act and the rules made thereunder.

***Contd …2…***

4. In the event of non-payment of the dues as above, SEBI shall recover the money by one or more of the following modes, namely:-
    a) attachment and sale of your movable property;
    b) attachment of your bank accounts;
    c) attachment and sale of your immovable property;
    d) arrest and detention in prison;
    e) appointing a receiver for the management of your movable and immovable properties.

5. Further, as per Explanation 1 to Section 28A of the SEBI Act, any direct or indirect transfer of your property or monies held in bank accounts to your spouse or minor child or son's wife or son's minor child, otherwise than for adequate consideration, on or after October 27, 2016, shall be deemed to be your property or money for the purpose of recovery.

6. You are also advised to take note that upon service of this notice, you are not competent to mortgage, charge, lease or otherwise deal with any property belonging to you except with the permission of the Recovery Officer and any such transfer shall be deemed void as per Rule 16 of the Second Schedule to the Income-tax Act, 1961 read with Section 28A of SEBI Act, 1992.

7. Any confirmation of e-payment(s) made (in the format as given in table below) should be forwarded to "The Recovery Officer, Recovery Division III, Securities and Exchange Board of India, SEBI Bhavan II, Plot No. C – 7, "G" Block, Bandra Kurla Complex, Bandra (E), Mumbai – 400 051" or sent by email to tanmayag@sebi.gov.in & recoveryho1@sebi.gov.in

| | |
|---|---|
| Case Name and Recovery Certificate Number : | |
| Name of Payer : | |
| Date of Payment: | |
| Amount Paid : | |
| Transaction No. : | |
| Bank Details (Bank Name, Branch Name, IFSC Code and Account No.) from which payment is made : | |

*Note: In the absence of confirmation of e-payment as per the above format, the credits made will not be accounted towards your dues.*

8. In addition to the aforesaid dues, you will also be liable for further interest, all costs, charges and expenses incurred in respect of recovery proceedings against you.

DEEPU ANANDAN
Digitally signed by DEEPU ANANDAN
Date: 2025.10.14 14:00:53 +05'30'

**Dated: 14.10.2025** **RECOVERY OFFICER**

***Contd…3…***

[***Copy to***: Depositories and All MutualFunds in India (by e-mail) with a request to provide the holding details of **Dolphin Universal Rural Development Limited [PAN: AAECD1060C], Shri Anindyo Paul [PAN: BYZPP3573J], Shri Debraj Mitra [PAN: NA], Shri Koushik Dutta [PAN: NA], Shri Rana Sikdar [PAN: NA], Shri Saugata Basu [PAN: AFUPB7369C], Shri Subham Bose [PAN: AFUPB9577J]** immediately by return e-mail and intimate to the Recovery Officer in case any sale or redemption request is received from the defaulter after the date of this Notice of Demand.]