SO/KV/PSD/2026-27/8749-8750

SECURITIES AND EXCHANGE BOARD OF INDIA

SETTLEMENT ORDER

In respect of:

Settlement Application No.	Name of the Applicant	PAN
8749/2025	I3E Trust	AAATI7545J
8750/2025	CIIE Initiatives	AADCC5039P

*(The aforementioned entities are hereinafter collectively referred to as "**Applicants**")*

IN THE MATTER OF I3E TRUST

1. I3E Trust (hereinafter referred to as the "**Fund**) and CIIE Initiatives (hereinafter referred to as the "**Investment Manager**) filed *suo-motu* settlement applications with the Securities and Exchange Board of India (hereinafter referred to as "**SEBI**") under the Securities and Exchange Board of India (Settlement Proceedings) Regulations, 2018 (hereinafter referred to as the "**Settlement Regulations**") proposing to settle by neither admitting nor denying the findings of facts and conclusions of law, the enforcement proceedings that may be initiated against them for the violation of regulation 23(1)(a) read with regulations 23(3) and 24(2) of the Securities and Exchange Board of India (Venture Capital Funds) Regulations, 1996 (hereinafter referred to as "**VCF Regulations**").

2. Brief facts of the case are as follows:

   2.1. I3E Trust had launched a scheme – Infuse Capital (hereinafter referred to as the "**Scheme**"), constituted with an initial tenure of eight years commencing on May 21, 2013 and a provision for extending the tenure by two years.

2.2. The end date of the extended tenure was May 21, 2023. However, it was noted that the process of liquidation of assets and distribution of proceeds was completed only on March 31, 2025 *i.e.* with a delay of about 2 years.

2.3. Thus, there was a delay in winding up of the Scheme and liquidation of assets and distribution of proceeds, which is in non-compliance with regulation 23(1)(a) read with regulations 23(3) and 24(2) of the VCF Regulations.

3. The Applicants filed the present applications for the purpose of settling the proceedings that may be initiated against them for the aforesaid violations. Pursuant to the receipt of the settlement applications, the Internal Committee of SEBI (hereinafter referred to as the "**IC**") held a meeting with the authorized representatives of the Applicants on March 11, 2026 wherein, the details of the matter were deliberated along with the terms of settlement.

4. The IC recommended an amount of ₹10,87,500/- (Rupees Ten lakh Eighty-Seven Thousand Five Hundred only) as the settlement amount computed in terms of Schedule II read with regulation 10 of the Settlement Regulations, payable jointly and severally by the Applicants.

5. The Applicants *vide* their letter dated March 16, 2026 filed revised settlement terms proposing to pay an amount of ₹10,87,500/- (Rupees Ten lakh Eighty-Seven Thousand Five Hundred only) jointly, as the settlement amount.

6. Pursuant thereto, the High Powered Advisory Committee (hereinafter referred to as the "**HPAC**") in its meeting held on May 06, 2026 considered the proposed settlement terms and recommended that the case may be settled on the aforesaid terms.

7. The recommendations of the HPAC were placed before the Panel of Whole Time Members and the same were approved by the Panel of Whole Time Members on June 01, 2026 in terms of regulation 15 of the Settlement Regulations. Subsequently, a Notice of Demand was issued to the Applicants. The Applicants, *vide* email dated June 11, 2026, have informed about the remittance of the aforesaid settlement amount. SEBI has confirmed credit of the said settlement amount.

8. On the basis of the facts stated above, in exercise of the powers conferred under section 15JB read with section 19 of the Securities and Exchange Board of India 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 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 regulations 28 and 31 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) the Applicants have failed to pay the difference due to any discrepancy while arriving at the settlement terms.

9. This Settlement Order shall come into force with immediate effect.

10. 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.

Kompella Venkata Ramana Murty — Digitally signed by Kompella Venkata Ramana Murty Date: 2026.07.14 10:19:40 +05'30'

KAMLESH CHANDRA VARSHNEY — Digitally signed by KAMLESH CHANDRA VARSHNEY Date: 2026.07.14 11:33:02 +05'30'

K.V.R. MURTY	**KAMLESH C. VARSHNEY**
WHOLE TIME MEMBER	**WHOLE TIME MEMBER**