

REGISTERED OFFICE :
6TH FLOOR, ARIA TOWERS, J. W. MARRIOTT,
NEW DELHI AEROCITY, ASSET AREA 4,
HOSPITALITY DISTRICT, NEAR IGI AIRPORT
NEW DELHI 110 037
TEL: 011 46101210 FAX: 011 46101202/41597321
CIN NO: L55101DL2007PLC157518
WEBSITE: www.asianhotelswest.com

ASIAN HOTELS (WEST) LIMITED

Date: 27.08.2016

General Manager
Corporate Finance Department
Division of Issues and Listing
Securities and Exchange Board of India
SEBI Bhavan, Plot No. C-4A,
G Block BKC, Mumbai 400051

Dear Sir/ Madam,

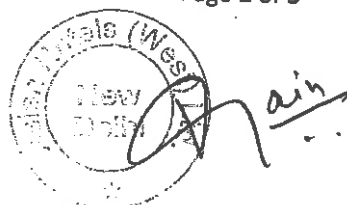
Sub: Request for an Interpretive Letter under Securities and Exchange Board of India (Informal Guidance) Scheme, 2003.

1. BRIEF FACTS:

1.1 Asian Hotels (West) Limited is a Company duly incorporated under the provisions of the Companies Act, 1956. The shares of the Company are listed on BSE and NSE. The Company is engaged in the business of construction, maintenance and running of hotels. The paid up capital of the Company as on date is Rs. 11,45,83,030 consisting of 1,14,58,303 Equity Shares of Rs. 10 each.

1.2 The present shareholding structure of the Company is as under:

Category	Names	No. of shares held	%
Promoters	M/s DSO Limited	53,36,880	46.58
	Chaman Lal Gupta & Sons, HUF	5,00,287	4.37
	Sh. Sushil Kumar Gupta	4,13,612	3.61
	Smt. Vinita Gupta	4,08,926	3.57
	Sh. Sandeep Gupta	2,68,975	2.35
	Sh. Sudhir Gupta	2,14,290	1.87
	Sh. Pankaj Gupta	78,900	0.69
	Smt. Gunjan Jain	77,700	0.68
	Smt. Renu Aggarwal	49,500	0.43
	Smt. Jyotsana Karl	4,200	0.04
	Smt. Sonal Sharma	3,000	0.03
	Smt. Madhu Jain	500	0.00
	Total Promoters holding	73,56,770	64.20
Total Public holding		41,01,533	35.80
TOTAL		1,14,58,303	100.00



1.3 The Company is in need of funds and the promoters are planning to infuse the requisite funds, by way of subscribing to company's securities, to be issued on preferential basis.

1.4 In the month of July, 2016, Smt. Madhu Jain, a person belonging to promoter group, out of her total holding of 49,500 equity shares, gifted 49,000 of them to her husband. The details of the same are as follows:

DONOR	DONEE	NO OF SHARES GIFTED	DATE	PURPOSE	CONSIDERATION
Smt. Madhu Jain	Sh. Dinesh Jain (Husband of Smt. Madhu Jain, not part of promoter group)	49,000 (0.42%)	13.07.16	Gift	NIL

2. **GUIDANCE SOUGHT:**

Based on the above facts, we seek your guidance as to whether the Gift of shares as stated above, will be considered as "sale" as envisaged in the Explanation to Regulation 72 (2) of SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2009 ("the Regulations), thereby making the promoters ineligible to subscribe to preferential allotment of specified Securities.

The relevant text of the Explanation to Reg 72(2) is reiterated below:

72. Explanation.—where any person belonging to promoter(s) or the promoter group has sold his equity shares in the issuer during the six months preceding the relevant date, the promoter(s) and promoter group shall be ineligible for allotment of specified securities on preferential basis.

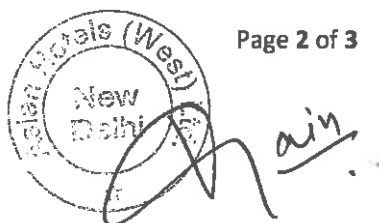
3. **OUR UNDERSTANDING:**

In view of the fact that the term used in the Regulations is "Sale", which involves a consideration and in our case, the concerned Promoter Group person has "Gifted" the shares, which is without any consideration, so, we are of the view that the above mentioned gift should not be construed as a "sale", as envisaged in the Regulations.

Nevertheless our view point, we request your good office to kindly enlighten us on proposed Preferential Allotment eligibility.

Further, as the issue of shares on preferential basis is price sensitive information and is not in public domain as of now, it is requested to give our case a confidential treatment, for a period of 90 days from the date of response from your good office.

Details of Payment of Prescribed Fee: The Prescribed fee of Rs. 25,000/- vide Demand Draft No. 827922 dated 23.08.2016 in favour of "Securities and Exchange Board of India" is enclosed.



We would appreciate if the clarification is provided to us at the earliest

Thanking You,
Yours Truly
For Asian Hotels (West) Limited


Vivek Jain

Company Secretary & Compliance Officer
Encl: Demand Draft towards fees