

# **TAJGVK HOTELS & RESORTS LIMITED**

## **Insider Trading Policy**

The Amended Code of Practice on  
SEBI (Prohibition of Insider Trading)(Amendment) Regulations, 2018

(As approved by the Board of Directors on 15<sup>th</sup> March, 2019)

**TAJGVK HOTELS & RESORTS LIMITED**  
**Code of Practices and Procedures**  
**For Fair Disclosure of Unpublished Price Sensitive Information**  
(Originally approved by the Board on 11-05-2015 and as amended on 15-03-2019)

**Pursuant to Regulation 8(1) of Chapter IV of the**  
**SEBI (Prohibition of Insider trading)**  
**(Amendment) Regulations, 2018**

In adherence to the principles of fair disclosures as enumerated under Schedule-A to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and as amended by the SEBI (Prohibition of the Insider Trading) (Amendment) Regulations, 2018 (hereinafter referred to as "SEBI PIT Regulations"), the Board of Directors of the Company viz. TAJGVK Hotels & Resorts Limited, would follow the following practices and procedures for the fair disclosure of unpublished price sensitive information:

1. Any material event / information that could have a bearing on the price discovery of the shares / securities of the Company shall be promptly disclosed.
2. The Company shall always endeavour to follow utmost standards of disclosures ensuring uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Head of Investors Relations Department shall act as the as a chief investor relations officer to deal with the dissemination of information and disclosure of unpublished price sensitive information.
4. In the unlikely event of any unpublished price sensitive information getting disclosed selectively, inadvertently or otherwise, the same shall be made generally available.
5. The Company shall always endeavour to provide appropriate and fair response to queries on news reports and requests for verification of market rumors by Regulatory Authorities.
6. The Company shall ensure that the information shared with analysts and research personnel is not unpublished price sensitive information.

7. Best practices shall be followed to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
8. All unpublished price sensitive information shall be handled on a need-to-know basis.
9. Sharing of information with directors, partners, collaborators, lenders, customers, suppliers / service providers, merchant bankers, legal advisors, auditors, insolvency professionals, other advisors or consultants and the Senior Management as defined under the Regulation 16(1)(d) of SEBI (Listing Obligations and Disclosure Requirements) (Amendment) Regulations, 2018 shall be considered as "legitimate purposes" for the purpose of sharing unpublished price sensitive information in the ordinary course of business by an insider, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the PIT Regulations.
10. A structured digital database shall be maintained containing the names of such persons or entities as the case may be with whom information is shared for legitimate purposes along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Adequate and effective system of internal controls will also be laid out to ensure the compliance of maintenance of a digital database for sharing the information for said legitimate purposes.
11. Any person in receipt of Unpublished Price Sensitive Information pursuant to a "legitimate purpose" shall be considered an "insider" for purposes of SEBI PIT regulations and such persons are also required to ensure the confidentiality of unpublished price sensitive information shared with them, in compliance with SEBI PIT Regulations.

Note:

Clauses 9 to 11 of the above were incorporated pursuant to the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 which shall come into force effective from 1st April, 2019.