

GALLOPS ENTERPRISE LIMITED

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CIN NO.L65910GJ1994PLC023470

30th March, 2019

To,
The Secretary, Listing Department
BSE Limited,
PhirozeJeejeebhoy Towers,
Dalal Street,
Mumbai – 400 001.
Maharashtra, India

Scrip Code : 531902

Dear Sir/Madam,

Sub: Intimation under Regulation 8(2) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended on 31st December 2018.

Please find enclosed herewith the revised "Code of practices and procedures for fair disclosure of unpublished price sensitive information (UPSI)" under regulation 8(1), Chapter IV, which has been amended to incorporate additional clauses mandated by the SEBI (Prohibition of Insider Trading) Amendment Regulations, 2018, as approved by the Board of Directors in its meeting held on today i.e. Saturday, 30th day of March, 2019.

The said amended Code is also available on Company's website at
<http://www.gallopsenterprises.com>.

Kindly take the above intimation on your record.

Thanking you,

Yours faithfully



Mukesh Patel
CFO

Encl.: As above

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

[As envisaged under Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]
(as amended w.e.f April 01, 2019)

Introduction:

As per Regulation (8) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("PIT Regulations"), a listed company to formulate and publish on its official website a "Code of Practices and Procedure for Fair Disclosure of Unpublished Price Sensitive Information" in adherence to the principles set out in Schedule A to the said Regulations.

Further, SEBI, on December 31, 2018 and January 21, 2019, notified various amendments to the Regulations, which will come into force on and from April 1, 2019 and January 21, 2019 respectively to make a policy/criteria for determination of "legitimate purposes" as a part of "Codes of Fair Disclosure and Conduct".

Accordingly, a code is hereby amended as under:-

Terms used in this Code (as hereinafter defined), unless specifically defined in the Code, shall have the same meaning ascribed to them in the Regulations.

The following Practices and Procedures shall follow for Fair Disclosure of Unpublished Price Sensitive Information (UPSI) :

1. Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
3. Designation of a senior officer as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.
7. Developing best practices 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.

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8. Handling of all unpublished price sensitive information on a need-to-know basis.

The company shall ENSURE the handling of all UPSI on a need-to-know basis.

1. The Company shall give due notice to the "Insider" to maintain confidentiality of such unpublished price sensitive information shared with them, in compliance with PIT regulations.
2. A structured digital database shall be maintained containing the names of Designated Persons and such persons or entities as the case may be with whom information is shared under PIT Regulations alongwith 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 purpose.
3. The Compliance Officer of the Company shall act as the Chief Investor Relations Officer (CIRO) for the purpose of dealing with dissemination of information and disclosure of UPSI as contained herein.
4. This Code is subject to review from time to time.

(Note: Pursuant to SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018, necessary amendments have been made in section of Definition and Clauses 8 & 9 which shall come into effect from 1st April, 2019)