

Date: February 10, 2021

To,
The Secretary,
Listing Department
BSE Limited
P.J Towers, Dalal Street, Fort,
Mumbai - 400 001

Scrip Code: 531723 / 570005

To,
The Manager,
Listing Department,
National Stock Exchange of India Limited
Exchange Plaza, 5th Floor, Plot No. C/1, G
Block Bandra - Kurla Complex, Bandra (E),
Mumbai-400051, Maharashtra.

Symbol: STAMPEDE / SCAPDVR

Subject: Intimation under Regulation 8(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Dear Sir/Madam,

In compliance with the provisions of the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018, the Company has revised its Code of Conduct Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information. The revisions to the Code and Policies are effective from February 10, 2021.

This disclosure and code of Conduct Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information of will also be made available on the website of the Company and can be accessed at: http://www.stampedecap.com/investor_relations.html

We request you to take the above on your record.

Thanking you.

Yours truly,

For and on behalf of Stampede Capital Limited



Srinivas Maya
Whole Time Director
DIN: 08679514
Date: 10.02.2021
Place: Hyderabad



Jonna Venkata Tirupati Rao
Managing Director
DIN: 07125471
Date: 10.02.2021
Place: Hyderabad

Enclosed as aforesaid:

Stampede Capital Ltd

402 to 404, 4 Floor, Saptagiri Towers, Begumpet, above Pantaloons, Hyderabad-500016, Telangana, India. Tel: +91 040-48578444/26, Email: cs@stampedecap.com, www.stampedecap.com
CIN: L67120TG1995PLC020170

CODE OF FAIR DISCLOSURE

Sr. No.	<u>Index</u>
1.	Objective
2.	Definition
3.	Disclosure of Price Sensitive Information
4.	Procedure for responding to any queries/requests for verification of market rumours by Stock Exchanges
5.	Sharing of UPSI for Legitimate Purpose
6.	Issue of Notice to the recipient of Unpublished Price Sensitive Information
7.	responsibility of the Recipient of UPSI

1. OBJECTIVE:

The Board of Directors of Stampede Capital Limited (“the Company”) has laid down this policy for Fair Disclosure and Conduct.

2. DEFINITION:

Words and expressions used and not defined herein but defined in Code of Conduct for regulating, monitoring and reporting of trading by Designated Persons and immediate relatives of Designated Persons in the securities of Stampede Capital Limited, as amended from time to time shall have the meanings respectively assigned to them in those legislation.

3. DISCLOSURE OF PRICE SENSITIVE INFORMATION:

- a. Disclosure / dissemination of any Unpublished Price Sensitive Information (“UPSI”) shall be done promptly by Compliance Officer, by intimating to the Stock Exchanges and posting of the said information on the website of the Company and/ or otherwise making it Generally Available.
- b. The Compliance Officer shall ensure uniform dissemination / disclosure of UPSI, so as to avoid selective disclosure (except legitimate purpose).
- c. No UPSI shall be shared with any person except for legitimate purpose unless the information is made Generally Available i.e. only public information can be shared.

Stampede Capital Ltd

402 to 404, 4 Floor, Saptagiri Towers, Begumpet, above Pantaloons, Hyderabad-500016,
 Telangana, India. Tel: +91 40 234 05683/84, Email: cs@stampedecap.com, www.stampedecap.com
 CIN: L67120TG1995PLC020170

4. PROCEDURE FOR RESPONDING TO ANY QUERIES/REQUESTS FOR VERIFICATION OF MARKET RUMOURS BY STOCK EXCHANGES:

The Compliance Officer shall give an appropriate, fair and prompt response to the queries, rumours or requests by regulatory authorities.

As and when necessary, the Compliance Officer shall make appropriate public announcement with respect to market rumours.

The Compliance Officer shall make a prompt dissemination of UPSI that gets disclosed selectively, in advertently or otherwise, to make such information Generally Available.

5. SHARING OF UPSI FOR LEGITIMATE PURPOSE:

- a. Notwithstanding anything contained in this Code, the UPSI may be shared by Compliance Officer or any appropriate authority of the Company in this behalf, only for legitimate purpose(s) which shall include the following:
 - i. Sharing of UPSI in the ordinary course of business by an Insider, Designated Person, Nodal Officer or by any Authorised Person with existing or proposed partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants.
 - Sharing of UPSI where such communication is for performance of duties.
 - Sharing of UPSI towards discharge of legal obligations.
 - Sharing of UPSI for any other purpose as may be prescribed under the applicable law for the time being in force.

Provided that such sharing should not be carried out to evade or circumvent the prohibition of SEBI (Prohibition of Insider Trading) Regulations, 2015.

- b. What shall constitute “**legitimate purpose**” and what shall not constitute “legitimate purpose” will be based on the business related needs of the Company. In general, Legitimate purpose shall, inter-alia, include the following purposes:

Stampede Capital Ltd

402 to 404, 4 Floor, Saptagiri Towers, Begumpet, above Pantaloons, Hyderabad-500016,
Telangana, India. Tel: +91 40 234 05683/84, Email: cs@stampedecap.com, www.stampedecap.com
CIN: L67120TG1995PLC020170

- i. Contractual Obligation
- ii. Business Strategy and Corporate Action
- iii. Operational efficiency
- iv. Regulatory Obligation
- v. Need based specific purposes

6. ISSUE OF NOTICE TO THE RECIPIENT OF UNPUBLISHED PRICE SENSITIVE INFORMATION:

- a. The recipient of UPSI which is communicated for any “legitimate purpose” shall be considered as an “insider” under the “Code of Conduct for Prevention of Inside Trading” adopted by the Company and such notice shall be given to the recipient of UPSI by the person making communication of UPSI in order;
 - i. To make aware recipient that the information shared is or would be UPSI.
 - ii. To make aware to recipient the duties and responsibility attached to the receipt of such UPSI and the liability attached to misuse or unwarranted.
 - iii. To instruct recipient to maintain confidentiality of such UPSI in compliance with the Code of Conduct for Prevention of Insider Trading and the other applicable laws.
 - iv. To advise recipient to be in compliance with applicable provisions of PIT Regulations.

7. RESPONSIBILITY OF THE RECIPIENT OF UPSI:

- a. To maintain and keep secret and confidential the information received.
- b. To use the confidential information only for the legitimate purpose.
- c. To disclose the confidential information to any other person strictly on a need to know basis; and
- d. To safeguard the UPSI with the same degree of care to avoid unauthorised disclosure as the receiving party uses to protect its own confidential information, but in no case less than reasonable care.
- e. To ensure compliance with applicable provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Stampede Capital Ltd

402 to 404, 4 Floor, Saptagiri Towers, Begumpet, above Pantaloons, Hyderabad-500016,
Telangana, India. Tel: +91 40 234 05683/84, Email: cs@stampedecap.com, www.stampedecap.com
CIN: L67120TG1995PLC020170