UNITED STATES OF AMERICA BEFORE THE SECURITIES AND EXCHANGE COMMISSION

December 20, 2019

ORDER GRANTING EXEMPTION FROM EXCHANGE ACT RULE 14E-5

Ballie Gifford European Growth Trust plc submitted a letter dated December 19, 2019, requesting that the Securities and Exchange Commission ("Commission") grant an exemption from Exchange Act Rule 14e-5 for the transaction described in its letter ("Request").

Based on the representations and the facts presented in the Request, and subject to the terms and conditions described in the letter from the Division of Corporation Finance dated December 20, 2019, it is ORDERED that the request for an exemption from Exchange Act Rule 14e-5 is hereby granted.

For the Commission, by the Division of Corporation Finance, pursuant to delegated authority.

Vanessa A. Countryman Secretary

Action as set forth or recommended herein APPROVED pursuant to authority delegated by the Commission under Public Law 87-592.

For: Division of Corporation Finance

By: /s/ Ted Yu

Date: December 20, 2019