

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OF UNPUBLISHED PRICE SENSITIVE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

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PREAMBLE

The Board of Directors of the Company has adopted the following Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI) as required under Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

DEFINITIONS

- 1) “Board” means the Board of Directors of the Company.
- 2) “Company” means Strides Pharma Science Limited.
- 3) “Compliance Officer” means Company Secretary of the Company.
- 4) “Legitimate Purpose” shall include sharing of UPSI in the ordinary course of business on a need-to-know basis for performing their duties or discharge of legal obligations by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants.
- 5) “Unpublished Price Sensitive Information” (UPSI) means any information, relating to the Company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following:
 - a) financial results;
 - b) dividends;
 - c) change in capital structure;
 - d) mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
 - e) change in key managerial personnel; and
 - f) such other information as communicated by the Compliance Officer.

Words and expressions used and not defined in this Code but defined in the SEBI (Prohibition of Insider Trading) Regulations, 2015 and Strides’ Code of Conduct for Prohibition of Insider Trading shall have the meanings respectively assigned to them in those regulations/ code.

For the purpose of this Code, Company Secretary of the Company shall be the Chief Investor Relations Officer (CIRO).

CODE

1. The Company shall make prompt public disclosure of UPSI that would impact price discovery relating to the Company or its Securities no sooner than credible and concrete information comes into being in order to make such information generally available.

2. Uniform and Universal dissemination of UPSI

All the UPSI that has a reasonable impact on the securities of the Company shall be promptly disclosed to all the stock exchanges where the securities of the Company are listed and on Company's website in order avoid selective disclosure.

Prompt public disclose of UPSI shall be done no sooner than credible and concrete information comes into being in order to make such information generally available.

3. The Chief Investor Relations Officer of the Company shall deal with the dissemination of information and disclosure of unpublished price sensitive concerning the Company.
4. The Company shall make efforts to **promptly disseminate any UPSI** about the Company that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall endeavour to provide an **appropriate and fair response to queries on news reports and requests** for verification of market rumours by regulatory authorities.

On the receipt of requests from any of the stock exchanges for verification of market rumours, the CIRO shall ascertain the factual position and after that appropriately and reasonably respond to such queries or requests.

At the time of making such a response, the CIRO may decide as to whether a public announcement is necessary for verifying or denying rumours and then make the disclosure.

6. The Company shall ensure that **information shared with analysts and research personnel** is not UPSI about the Company.
7. The Company shall develop best practices to make transcripts or records of earnings call conducted for investors/ analysts on the Company's website to ensure official confirmation and documentation of disclosures made.

8. Handling of UPSI

UPSI shall be shared only in furtherance of Legitimate Purpose which shall include the following:

- a) Sharing of UPSI in the ordinary course of business by any Insider or Designated Person with existing or proposed Partners, Collaborators, Lenders, Customers, Suppliers, Merchant Bankers, Legal Advisors, Auditors, Insolvency Professional or other Advisors or Consultants.
- b) Sharing of UPSI where such communication is in furtherance of the performance of duty (ies).
- c) Sharing of UPSI for the discharge of legal obligations or as may be prescribed under Securities Regulations or Company Law or any other law for the time being in force, in this behalf.
- d) Sharing of UPSI for any other genuine or reasonable purpose as may be determined by the Executive Directors of the Company.

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

Issue of Notice to the recipient of UPSI

Any person in receipt of UPSI pursuant to a “legitimate purpose” shall be considered an insider for purposes of this Code and due notice shall be given to such persons:

- a) to make aware such person that the information shared is or would be UPSI.
- b) to make aware to such person the duties and responsibilities attached to the receipt of such UPSI and the liability attached to misuse.
- c) to instruct such person to maintain the confidentiality of such UPSI in compliance with these regulations.

AMENDMENT TO THIS CODE

This Code shall be subject to review and be amended from time to time, as may be deemed necessary and in accordance with any regulatory amendments.
