



December 11, 2024

**BSE Limited**

Listing Department  
25<sup>th</sup> Floor Phiroze Jeejeebhoy Towers  
Dalal Street, Fort  
Mumbai – 400 001

**Scrip Code: 532531**

**NSE Limited**

Listing Department  
Exchange Plaza, C-1, Block G,  
Bandra Kurla Complex,  
Bandra (East) - 400 051

**SYMBOL: STAR**

Dear Madam/ Sir,

**Ref: Scheme of Arrangement between Strides Pharma Science Limited (the 'Company' or 'Strides'), Steriscience Specialities Private Limited ('Steriscience') and Onesource Specialty Pharma Limited ('Onesource') and their respective shareholders ('Scheme') in terms of Sections 230-232 of the Companies Act, 2013**

**Sub: Apportionment of Cost of Acquisition of Equity Shares pursuant to the Scheme**

With reference to the above, please find attached guidance to shareholders of the Company relating to post demerger Cost of Acquisition (COA) of the equity shares of the Company and Onesource in terms of the provisions of the Income Tax Act, 1961.

Kindly note that this communication is merely for the general guidance of the shareholders and should not be considered as a substitute for any independent opinion that the shareholders may obtain.

Company has issued this guidance basis discussion with a senior counsel. The concerned regulatory, statutory or judicial authority, including any assessing officer/ appropriate appellate authority, could take a different view. Company takes no express or implied liability in relation to this guidance.

Please note that if there is any change including change having a retrospective effect in the statutory laws and regulations, comments expressed in this communication would necessarily have to be re-evaluated in light of the changes. Strides and Onesource do not take the responsibility of updating this communication at any time in the future.

This communication is also being uploaded on the website of the Company i.e., <https://www.strides.com/>

Request you to kindly take the same on record and oblige.

**Thanks & Regards,  
For STRIDES PHARMA SCIENCE LIMITED**

**Manjula Ramamurthy  
Company Secretary  
ICSI Membership No: A30515**



**FOR THE ATTENTION OF SHAREHOLDERS OF  
STRIDES PHARMA SCIENCE LIMITED ('THE COMPANY')**

The National Company Law Tribunal, Mumbai Bench, vide its Order dated November 14, 2024 has approved the Scheme of Arrangement between Strides Pharma Science Limited (the 'Company' or 'Strides'), Steriscience Specialities Private Limited ('Steriscience') and Onesource Specialty Pharma Limited ('Onesource') and their respective shareholders ('Scheme') in terms of Sections 230-232 of the Companies Act, 2013.

***The Scheme, inter-alia, provides for the following:***

- a) Demerger of Identified CDMO Business and Soft Gelatin Business of Strides (Demerged Undertaking 1) into Onesource ("Transferee Company" or "Resulting Company");
- b) Demerger of Identified CDMO Business of Steriscience (Demerged Undertaking 2) into Onesource ("Transferee Company" or "Resulting Company").

Strides had fixed December 06, 2024, as the Record Date to determine the eligibility of its equity shareholders who would be entitled to receive the equity shares of Onesource, pursuant to the Scheme.

In terms of the Scheme, Onesource is required to issue and allot, to each shareholder of Strides whose name appears in the Register of Members of Strides and/ or in the Depositories as Equity Shareholder of Strides as on the Record Date, One fully paid-up equity share of Rs. 1/- each of Onesource, for every Two fully paid-up equity shares of Rs. 10/- each of Strides, held by such equity shareholder in Strides.

For the purpose of determining the Cost of Acquisition (COA) of the equity shares of the Company and Onesource (post demerger), you are advised to split your COA of equity shares in the Company in the following manner:

<b>Name of the Company</b>	<b>% of Cost of Acquisition of Equity Shares</b>
Strides Pharma Science Limited	89.35%
Onesource Specialty Pharma Limited	10.65%
<b>Total</b>	<b>100.00 %</b>

**For Example:**

A shareholder holds 60 shares (having face value of Rs. 10/- each) in Strides before the Record Date i.e., December 06, 2024 at a price of Rs. 1,000/- per share. Total cost of acquisition of 60 shares is Rs. 60,000. Such shareholder will be allotted 30 fully paid-up equity shares (having face value of Rs. 1/- each) of Onesource for 60 shares held in Strides.

The proportionate COA of 30 shares of Onesource shall be INR 6,390 (i.e., INR 213 per share) and that of 60 shares of Strides shall be INR 53,610 (i.e. INR 893.50 per share).

Further, according to the provisions of Section 47 (vi) (d) of the Income Tax Act, the issue of shares of the Resulting Company i.e., Onesource to the equity shareholders of the Demerged Company 1 i.e., Strides pursuant to the Scheme is not a transfer and hence not taxable in the hands of the equity shareholders.



In respect of the equity shares to be issued by Onesource, the date of acquisition of such equity shares, for the purpose of capital gains in the hands of the shareholder, will be the date of acquisition of the original shares of Strides for each shareholder, as per clause g of Explanation 1 to section 2 (42A) of the Act.

*This communication is for the benefit of shareholders and the Company takes no express or implied liability in relation to this guidance.*

\*\*\*\*\*