

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

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PREAMBLE

The Board of Directors (the "Board") of Strides Arcolab Limited (the "Company" or "Strides"), has adopted the following Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information in their meeting held on May 22, 2015.

This Code is in compliance with Regulation 8(1) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("Regulations") read with Schedule A of the Regulations.

DEFINITIONS

"Board' means Board of Directors of the Company.

"Company" means Strides Arcolab Limited.

"Compliance Officer" means Company Secretary of the Company.

"Unpublished Price Sensitive Information" (UPSI) means any information, relating to a company or its securities, directly or indirectly, that is not generally available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:

- financial results;
- dividends;
- change in capital structure;
- mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
- change in key managerial personnel; and
- material events in accordance with the listing agreement.

The Board has appointed Mr. Badree Komandur, Company Secretary (Compliance Officer) as the Chief Investor Relations Officer, who shall report to the Board, for the purpose of this Code.

CODE

1. The Company shall make prompt public disclosure of Unpublished Price Sensitive Information that would impact price discovery relating to the Company or its Securities no sooner than credible and concrete information comes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. The Company shall ensure uniform and universal dissemination of unpublished price sensitive information in relation to the Company or its Securities through Stock Exchanges where the securities of the Company are listed and Company's website and in order avoid selective disclosure.

3. The Chief Investor Relations Officer of the Company shall deal with dissemination of information and disclosure of unpublished price sensitive in relation to the Company.

4. The Company shall make efforts to promptly disseminate any unpublished price sensitive information in relation to the Company that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

5. The Company shall endeavour to provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.

6. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information in relation to the Company.

7. The Company shall develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the Company's website to ensure official confirmation and documentation of disclosures made.

8. The Company shall develop best practices to handle all unpublished price sensitive information in relation to the Company on a need-to-know basis.

POWERS OF THE BOARD

The Board of Directors of the Company may amend, abrogate, modify or revise any or all clauses of this Code in accordance with the applicable provisions of the Regulations, listing agreement entered into by the Company with the Stock Exchanges and guidance note issued by such Stock Exchanges, from time to time.

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