

Code of Conduct & Ethics
For Directors and Employees
(including Senior Management Personnel)





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INTRODUCTION

It is vital to the business success of Strides Pharma Science Limited and its Subsidiaries ("Strides" or the "Company") that we conduct our business with honesty and integrity and in compliance with all applicable legal and regulatory requirements. This Code of Conduct ("Code") sets out the fundamental standards to be followed by all directors and employees in their everyday actions on behalf of Strides.

Affiliate Companies of Strides are also encouraged to conduct their business in line with the Code.

At Strides, we are guided by our values in everything we do. Our values **ICE** stands for **Integrity, Collaboration and Efficiency**.

- **Integrity** – *We will follow the right practices and do the right thing*
- **Collaboration** – *We will work together, understanding and supporting each other*
- **Efficiency** – *We will do everything to deliver quicker, better results*

This Code is drafted in accordance with the Values of the Company so that the Company conducts its business with honesty and integrity and in compliance with all applicable legal and regulatory requirements.

SCOPE

This Code applies to all Directors (including Independent Directors), Employees (including Senior Management Personnel (SMP)) part time employee, temporary employee, contractual employee, trainees, consultants, customers, suppliers, volunteers of the Company, and its Subsidiaries.

Subsidiaries of the Company which is outside India would be required to comply with the requirements of the local laws. In case there is a contradiction between the Code and the local law, the local law shall prevail. In case the local is silent about any specific provision, then the code shall prevail.

This Code does not attempt to describe all potential problem areas that could develop. However, some of the more common problems are described.

Wherein it is not specifically mentioned, the term "employee/s" would also include the Executive Directors and SMPs of the Company. The code shall also apply to the Non-Executive Directors, including the Independent Directors of the Company as per the relevant provisions of the Companies Act 2013 and the SEBI Listing Regulations.

INTRODUCTION

This Code is a guide to the ethical practices that we share as we work for Strides within the legal and regulatory laws that are applicable from time to time. The standards in the Code pave way for actions to be taken. This Code is not exhaustive to address every situation that may be encountered and is not a substitute for an individual's exercise of thoughtful judgement and common sense.

Strides has a long-standing commitment to compliance with applicable laws and regulations, in whichever country we have presence, and we operate in accordance with the highest standards of business conduct. In many instances, our Code guidelines and standards go beyond the requirements of applicable law.

We should honor the Code and conduct our business with high levels of integrity. We are judged by our actions and have to ensure that our employees are aware of the ethical standards at Strides.

This Code captures the core values that every employee associated with Strides needs to inculcate in him/ her so that they can demonstrate Strides' commitment towards values and ethics.

This Code has also been adopted by the Board of Directors (collectively referred to as the "Board" and individually referred to as "Director") and the Senior Management Personnel (hereinafter referred to as

"SMP") in compliance with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") to assist the Board and SMP in fulfilling their duties to the Company.

While the Board is entrusted with responsibility to oversee management of the business and affairs of the Company, SMPs are entrusted with the management of the business and affairs of the Company under the direction and supervision of the Board of the Company. The duties of the Directors (including Independent Directors) as per the Companies Act, 2013 is explained in **Annexure 1**.

As the Company's policy-makers, the Board sets the standard of conduct for all the officers and employees of the Company.

The Company has a continued commitment to compliance with applicable laws and regulations and to operating in accordance with the highest standards of business conduct.

Your Human Resource Manager or Compliance Officer will provide you with access to company's policies manuals and other procedures related to your job.

How to use this Code:

1. Read and become familiar with this Code and its purpose.
2. Understand your duties and responsibilities.
3. Practice highest level of standards and ethics in your daily work.
4. Raise concerns if you know any person from Strides compromising on these aspects.

PURPOSE AND PERSONAL RESPONSIBILITY

Respect our Code

The Code sets out the fundamental standards to be followed by all employees in their everyday actions, be familiar with the Code. You play a critical role in ensuring that Strides is a great work environment and in protecting our culture, our reputation and our brand

Encourage Employees to follow the Code

Help us spread the awareness and encourage employees follow our Code

Seek Guidance

If you are unsure of what to do in a situation, you have resources available to you. It is your responsibility to ask questions and raise concerns when compliance issues arise

Promote

Each of us, especially leaders and managers, must act with integrity and inspire trust and lead by example

Express and Report

When you believe something isn't right, you can speak up and share your concerns. You can contact Human Resource Manager or Business Unit Head

Comply

All of your work must comply with our Code, our policies, and the laws and regulations of the land.

Train

You will have to take an online test and ensure all your team members are trained on our Code.

The Employees should seek to observe due care in the performance of his/ her duties, be loyal to the Company and act in good faith and in a manner, that he/ she reasonably believes to be in and not opposed to the best interests of the Company.

Non-retaliation

The Company has a whistle-blower policy. For more information please refer to the company website at www.strides.com

Inclusive Guidelines for conduct applicable specifically to the Board:

Board of Directors shall:

- a) use reasonable efforts to attend Board and Committee meetings regularly;

- b) dedicate sufficient time, energy and attention to the Company to ensure diligent performance of his/ her duties, including preparing for meetings and decision-making by reviewing in advance any materials distributed and making reasonable inquiries;
- c) be aware of and seek to fulfill his/ her duties and responsibilities as set forth in the Company's Memorandum of Association, Articles of Association and this Code
- d) seek to comply with all applicable laws, regulations, confidentiality obligations and corporate policies.

Inclusive Guidelines for conduct specifically applicable to SMP

SMPs shall

- a) dedicate sufficient time, energy and attention to the Company to ensure diligent performance of his/ her duties, including decision-making by reviewing in advance any materials distributed and making reasonable inquiries;
- b) be aware of and seek to fulfill his or her duties and responsibilities as may be stipulated by the Company from time to time; and
- c) seek to comply with all applicable laws, regulations, confidentiality obligations and Corporate Policies.

BUSINESS ETHICS AND PRACTICES

PROTECTING ASSETS AND RESOURCES

Strides mandates that all employees should protect its assets/resources and ensure that it is efficiently used. Any form of theft, pilferage and wastage of assets and resources belonging to Strides and that has a direct impact on its success and growth will constitute a breach of the Code and may constitute an offence under the applicable law. The assets and resources belonging to Strides are highly valuable and will be used only for legitimate business purposes.

All assets and resources of Strides are essential tools for our existence and success and should never be used for illegal or unethical activities. As an exception, employees are allowed to use communication systems for reasonable personal use for exigencies alone without impacting their performance or being a nuisance to fellow colleagues.

Protecting assets of Strides is a key responsibility of every employee. Care should be taken to ensure that the assets are not misused, misappropriated, loaned to others, sold, donated or mortgaged, without appropriate authorization.

Every employee is personally responsible for all Strides funds over which he or she exercises control. Strides' funds must be used only for business purposes. Every employee must take reasonable steps to ensure that Strides receives proper service and fair value for funds spent and should also maintain accurate and timely records of all expenses.

Removing any or all of Strides' assets from office premises without permission is regarded as theft or pilferage. Violation of Intellectual Property

rights belonging to Strides and confidentiality obligations will constitute a breach of the Code and an offence under the law.

Upon termination of employment with Strides, every employee is duty bound to return all assets (belonging to Strides) in his or her control/possession to Strides.

USE OF COMMUNICATION SYSTEMS

Strides makes communication systems easily available, but employees must use all communication systems appropriately and responsibly within the framework of the Information Technology Policy as available in the portal.

Communication systems should not be used:

1. for unlawful activities
2. for unethical activities
3. to visit internet sites for personal pleasure and profit
4. for intentional mischief to compromise security controls
5. to forward internal communications and confidential information
6. to download or redistribute or duplicate copyrighted material.

Unlawful act is an act that is contrary to or violates a law that exists.

Unethical act means an act not conforming to a high moral standard or those acts which are morally unacceptable.

Strides reserves the right to access and monitor all messages and files on its system, including information regarding employee internet use, as and when deemed necessary and appropriate.

The electronic resources should be used in an effective, ethical and lawful manner.

Users who receive or notice obscene or inappropriate messages are needed to report the same immediately to their immediate superior or the Human Resources Department. Strides will not be responsible for actions of employees deemed illegal with respect to the usage of electronic resources.

Employees should ensure that they use only licensed software and take back-up of all important data. Uses that threaten the integrity of the system, the privacy of others, or that are otherwise illegal, are hence forbidden.

CONFLICTS OF INTEREST AND CORPORATE BUSINESS OPPORTUNITIES

Conflict of Interest:

Conflict of interest will occur when there is a prospect of direct or indirect gain which may influence your actions while conducting business.

Avoid actual and potential conflict of interests and do not advance personal interests at the expense of Strides.

A conflict of interest occurs when one's private interests interfere in any way, or even appear to interfere, with the interests of the Company. A conflict situation can arise when a Director or SMP takes actions or has interests that make it difficult to perform his/her duties for the Company objectively and effectively.

All Employees/ Directors are expected to dedicate their best efforts in advancing the Company's interests and to make decisions that affect the Company based on the Company's best interests and independent of outside influences.

Obligation to conduct the Company's business in an honest and ethical manner includes the ethical handling of actual or apparent conflicts of interest between personal and business relationships.

Possible conflict of interest can arise when an employee or his/ her family has ownership, profit or employment interest with a competing firm. Some of the common conflicts you should avoid are:

1. No Director/ Employee will be involved in any arrangement or circumstances, including family or other personal relationships, which might discourage him/ her from acting in the best interest of Strides.
2. No Employees who are related to each other (spouse, sibling, children) shall be in a direct working relationship or involved in the hiring process for such relatives.
3. No Director/ Employee or his/ her family member will act as a broker or on behalf of a third party in transactions involving or potentially involving his/ her company with Strides.
4. Directors/ Employees should not be the final decision maker for any business contract or arrangement with any organization wherein his/her relatives/ close friends are employed in key positions.
5. No Employees/ Directors shall own an interest in a company that competes with or does business with the Company, without disclosing to the Board of the Company;
6. No Employees/ Directors shall participate in a joint venture, partnership or other business arrangement in competition with the Company, without disclosing to the Board of the Company;

7. No Employees/ Directors shall be in employment with or serving as a director of a competitor, customer or supplier of the Company, without disclosing to the Board of the Company;
8. No Employees shall be in employment with or serving as a director of a competitor, customer or supplier of the Company, without disclosing to the Board of the Company;

A Director or Employee, who has an actual or potential conflict of interest, including any of the situations described above, must disclose to the Board:

- i) the existence and nature of the actual or potential conflict of interest; and
- ii) all facts known to him/ her regarding the transaction that may be material to a judgment about whether or not to proceed with the transaction.

While Non-Executive Directors, including the Independent Directors may proceed with the above listed transactions and inform the Board, the Employees of the Company, including the Executive Directors and the SMPs shall seek approval from either the Board or the Managing Director of the Company.

The Director/ SMP, before conducting business of the Company with a related party or a relative, and/or with a business in which a relative is associated in any significant role, shall promptly disclose his/her interest to the Board of Directors.

For the sake of clarity, the term "related party" and "relative" shall have the same meanings as defined respectively under Sections 2(76) and 2(77) of the Companies Act, 2013.

The Company has formulated a Related Party Transaction Policy, in accordance to which all the related party transactions are dealt with at Strides, with necessary disclosure and approval to/ from the Audit Committee and the Board.

For more details, you may please refer the Company's policy on Related Party Transactions available at the website of the Company:

Corporate Business Opportunity:

A corporate business opportunity is:

- i. an opportunity in the Company's line of business or proposed expansion or diversification,
- ii. which the Company is financially able to undertake and
- iii. which may be of interest to the Company.

For Board:

Except as described elsewhere herein, any member of the Board may engage in business so long as he/ she does not pre-empt or seize a corporate business opportunity.

A director who learns of a corporate business opportunity and who wishes to participate in it should disclose the opportunity to the Board.

If the Board determines that the Company does not have an actual or expected interest in the opportunity, then, and only then, may the director participate in it, provided that the director has not wrongfully utilized the Company's resources in order to acquire the opportunity.

For Employee and SMP:

Except as described elsewhere herein, an Employee and SMP shall not engage in business so long as he/ she is in the employment of the Company nor pre-empt or seize a corporate business opportunity.

OUTSIDE EMPLOYMENT

All Employees including Executive Directors and SMPs are expected to devote their full time and attention to the business interests of the Company and are prohibited from engaging in any activity prejudicial to the interests of the Company. Any simultaneous employment with competitors of the Company, or any engagement in any activity with competitors could be against the business interests of the Company.

Any outside activity must be strictly separated from the Company's employment and should not adversely affect the Executive Directors' and SMPs' job performance at the Company. All the Employees, Executive Directors and SMPs' shall devote themselves exclusively to the business of the Company and shall not accept any other work or assignment (part-time or otherwise) to acquire the opportunity.

OTHER DIRECTORSHIPS

Any Non-Executive or Independent Directors, may serve on the Board of another entity provided that they disclose their Directorship in any such entity as and when it arises, in prescribed format and within stipulated timeline as per the Companies Act, 2013.

If such entity wherein he intends to be a Director is directly or indirectly a competitor of the Company, prior consent of the Board of Directors would be required, in addition to the formalities to be fulfilled as per the Companies Act, 2013.

A whole-time KMP shall not hold office in more than one company except in its subsidiary company at the same time.

However, any Executive Directors or KMP can be appointed as a Director (non-executive) in any other company as per the relevant provisions of the Companies Act, 2013, provided that such entity is not directly or indirectly a competitor of the Company.

Any Employee including SMP may, with the prior consent of the Board of Directors, serve on the Board of another entity provided that such entity is not directly or indirectly a competitor of the Company.

Nothing in this clause shall apply if such Directorship is held in any wholly owned subsidiaries of Strides. Further, such Directorship will be treated as part of their employment contract with Strides, and they will not be paid any remuneration for such Directorships, unless agreed otherwise prior to joining.

GIFTS AND ENTERTAINMENT

Directors and Employees are restricted from accepting or giving gifts on behalf of the Company, except those which are permitted under the Code.

The Company recognizes that constructive business relationships may include occasional, incidental provision of gifts. It is customary in many cultures to give gifts to anyone who have a business relationship with the Company. However, gifts which are or may be seen as exceptional, lavish or disproportionate or given to certain individuals who have the ability to make decisions affecting the Company, shall be regarded as improper or unlawful.

The Company does not encourage accepting and giving gifts with mala-fide intention and shall not be responsible in case any employees accepts or gives gifts with a mala-fide intention.

While a gift is being made to anyone on behalf of the Company, the following should be considered:

- It should not be given to obtain or retain business or gain any improper advantage;
- It is lawful under the laws of the country where the gift is being given and is also permitted under the policies of the client;

- It constitutes goodwill expenditure and is not in the form of cash;
- The gift is of nominal value on an individual and aggregate basis.

The same principle must also be applied when gifts are received by Employees & Directors on behalf of the Company. If any employee receives any gift which is perishable in nature, it is encouraged that such gifts are distributed amongst the team.

Nominal Value of the Gift to be given/ accepted shall not cross INR 5,000 (Rupees Five Thousand only) or its equivalent in any foreign currency.

Any gift received by any employee of the Company beyond the said amount, would mandate prior approval from the Compliance Officer.

Any gift received by any Director or KMPs or SMPs beyond the said amount, would mandate prior approval from the Managing Director.

Business entertainment

Business entertainment of non-government employees occurring in connection with business discussions or the development of business relationships is generally deemed appropriate in the conduct of official business. This may include business-related meals and trips, refreshments before or after a business meeting, and occasional sports, theatrical or cultural events.

Entertainment in any form that would likely result in a feeling or expectation of personal obligation should not be extended or accepted. This applies equally to both giving and receiving entertainment. Appropriate entertainment may be offered to customers by persons authorized to do so, subject to the business expense reimbursement requirements applicable.

BRIBES AND IMPROPER PAYMENTS

Strides' policy is not to make any contribution of company funds, property or services to a political party, religious organization or holder of any Government office in order to advance its business interest or to induce or influence government decisions. This means avoiding corruption of all kinds. Strides is committed to abide by all applicable anti-bribery laws governing its operation in India and globally.

Employees shall not directly or indirectly make any unauthorized payments to government representatives.

Employees are prohibited from receiving, offering, promising, authorizing, directing, or making any improper payments, kickbacks, or payments of money or anything of value to improperly obtain business or any other advantage for Strides or for self.

Improper payments can be of many forms including:

Improper payments can be of many forms including:

- Direct cash payments
- Kickbacks
- Unreasonable rebates or discounts
- Invoices for some disguised expenses
- Excessive goods and services for personal use

Should the employee be aware of any close relative directly or indirectly involved with suppliers or customers of Strides, then such employee shall take special care to disclose and work always in collaboration with another colleague or superior. Further, such conflict of interest should be brought to the attention of the Secretarial Department to ensure adherence to law.

POLITICAL CONTRIBUTIONS AND ACTIVITIES

Section 182 of the Companies act, 2013 which has been notified with effect from 12th September 2013 provides for prohibitions and restrictions regarding political contributions.

Prior approval of the Board to be sought by way of resolution passed at its Board meeting.

In general, Directors/ Employees may make political contributions in their personal capacity to candidates, parties and other such entities in their name but not on behalf of or in the name of Strides.

Strides will not reimburse any such contribution/s. Under no circumstance must a Director/ Employee coerce or pressurize other Directors/ Employees to make any political contributions.

Personal Political Activity

Strides encourages employees to participate personally in civic affairs and the political process. However, employees must:

- Make all political contributions with their own money
- Conduct any personal political activities in their own personal time;

- Conduct all personal political activities in accordance with applicable laws;

The following guidelines include but is not limited to and shall be adhered to for all personal political activity:

- Your personal contributions to a candidate or a political party must not appear to be made on behalf of Strides;
- You will not be paid for any time spent pursuing personal political activities in public offices, serving as an elected official, campaigning for a political candidate, or attending political fundraisers;
- You shall not use or permit any campaign, candidate, or political party to use any company facility or property;
- You shall not pressurize any co-employee or co-worker to attend such political activity;

WORK ENVIRONMENT

EQUAL EMPLOYMENT OPPORTUNITIES

Strides respects the rights and dignity of all employees and expect its business partners to comply with applicable laws, acceptable industry standards and practices such as protection of human rights, safe working environment, prohibition of child labour, Forced Labour etc.

Strides seeks to create a challenging environment of empowerment and continuous learning, to recognize individual and team contributions, and to reward competitively, relative to performance. It is expected that all employees of Strides treat the people they interact with, both within and outside the Company, with respect and in a manner that their self-esteem and dignity are maintained at all times.

Strides is committed to provide a work environment free of unlawful harassment and committed to provide equal employment for all persons regardless of:

- Race
- Colour
- Religion
- Sex/Gender, including Pregnancy
- Age
- Marital status
- National origin
- Disability
- Sexual orientation
- Family and career responsibilities
- Gender identity and intersex status
- HIV status

Sexual harassment and harassment based on age, race, religion, caste, ethnic origin, disability, marital status, sexual orientation, pregnancy/ childbirth, family/ career responsibilities, gender identity/ intersex status, HIV status or any other

is prohibited. Strides is also committed towards abiding with all such acts and regulations as launched and effected in this regard, from time to time.

Strides is dedicated towards ensuring the fulfilment of this policy with respect to hiring, compensation, promotion, training, or others terms, conditions and privileges of employment.

Strides complies with the applicable laws and the regulations governing non- discrimination wherever Strides operates.

Employees shall freely share required information with each other, learn from each other, and help one another to develop and grow, and contribute towards making the experience of working for Strides an enjoyable one for every member of the Strides family.

Strides recognize and abide by all the Human Rights enshrined and recognized Nationally/Internationally.

DISCRIMINATION AND HARASSMENT

Strides believes in a work environment that is free of Discrimination, Harassment and Improper conduct.

Employee policies and practices shall be administered in a manner that would ensure that in all matters equal opportunity is provided to those eligible and the decisions are merit-based.

Principles:

Strides maintains appropriate levels of employee awareness of what constitutes unacceptable behaviour in the work place.

Every employee shall be/are aware of their rights and responsibilities relating to harassment and workplace discrimination.

Workplace discrimination is denying any person equality of treatment in employment matters.

Discrimination can occur directly or indirectly.

Direct Discrimination: Person or group treated unfair because of attributes such as age, gender, religion, marital status, disability etc.

Indirect Discrimination: Indirect discrimination occurs by openly displayed pictures, postures or written materials imposing rules or policies which are alike for most but has a disproportionate effect on group or groups including but not limited to women/LGBTQ.

Strides practices and promotes such policies in all locations as appropriate under law. We affirm this principle of freedom from discrimination in all aspects of the employment relationship, from recruitment and hiring, through performance evaluations, compensation, and promotions, to the end of your employment relationship.

The actions undertaken by Strides are strictly on individual ability, performance, experience and the company needs. Strides avoids taking any action which is influenced by personal

SEXUAL HARASSMENT

At Strides, we have zero-tolerance for Sexual Harassment. We value every Employee working at Strides and wish to protect their dignity. Strides has adopted a gender-neutral policy, which covers every Employee across the Group, as defined in more detail in this Policy. The Policy encourages every Employee who has been sexually harassed to use the Redressal System that is laid down under this Policy.

In compliance with The Convention on the Elimination of all Forms of Discrimination against Women (CEDAW) and as per the requirements of the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 (the 'Act') read with the Sexual Harassment of

relationships and discriminatory practices of any kind. Strides is committed to adhering to wage, hour and minimum age guidelines provided by applicable laws in whichever place Strides has its presence.

Strides endeavors to structure the content of the jobs in a manner that the work provides personal satisfaction and the employees take up the work as a challenge.

Harassment

Harassment is a kind of behavior that is likely to offend, humiliate or intimidate. It spoils the positive work environment. It includes verbal, visual and physical conduct. Some examples of work place harassment might include:

- Derogatory language
- Insults and teasing
- Offensive physical contact
- Intimidating actions
- Openly displayed pictures, postures or written materials which might be offensive to some
- Phone calls, messages or mails which are threatening abusive or offensive.

Women at Workplace (Prevention, Prohibition & Redressal) Rules, 2013 (the 'Rules') as amended time to time, Strides has adopted Policy For Prevention, Prohibition & Redressal Of Sexual Harassment at Workplace (POSH Policy) to provide a safe, respectful and dignified working environment to its Employees and condemns all forms of harassment.

Any distinction, exclusion or restriction made on the basis of sex which has the effect or purpose of impairing or nullifying the recognition, enjoyment or exercise by women, irrespective of their marital status, on a basis of equality of men and women, of human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field.

Sexual harassment is any unwanted, unwelcome or uninvited behavior of a sexual nature that is likely to offend, humiliate or intimidate.

Sexual harassment may include any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely but not limited to the following:

1. physical contact and advances; or
2. a demand or request for sexual favours; or
3. making sexual coloured remarks; or
4. showing pornography; or
5. any other unwelcome physical, verbal or non-verbal conduct of sexual nature

Strides encourages the employees to share relevant information about actions that may violate this code of the policy on Sexual Harassment that Strides has put in place. Employees may reach out to the member of the PoSH Committee or their Department Heads to report any such incidents.

For more details, you may please refer the Company's policy on Prevention of Sexual Harassment available at Strides Portal.

SAFETY HEALTH AND ENVIRONMENT

At Strides we are committed to provide a safe and healthy working environment. We are conscious of the environmental impact and hence we are committed to the long term goal of developing a sustainable business.

Strides conducts its operations in a manner that complies with the prevailing laws, regulations and public policies to protect the health and safety of its employees.

Strides ensures health and safety of all employees by providing:

- Information, instruction, training and supervision for all employees. Training for the employees on safety, health and environment awareness to conserve the resources and prevent pollution.
- Processes for identifying hazards, assessing risks and elimination or control of risks.
- Processes for regular review of risk control measures.
- Complying with laws and public policies.

PRODUCT QUALITY AND SAFETY

Strides has implemented as required the best practices, necessary guidelines, applicable compliance requirements under national and international requirements for its manufacturing and operational processes.

DRUGS AND ALCOHOL

Employee should not be in possession of or under the influence of alcohol or illegal drugs while working at Strides . Alcohol and drugs can impair your ability to work effectively and also intoxication may jeopardize your well- being and safety of those around you.

Employee should not report to work impaired by alcohol. Involvement with certain drugs without prescription is illegal. Abuse of alcohol or other drugs may damage physical and mental health.

LEGAL AND COMPLIANCE

SECURITIES LAW

It is Strides' policy to make full, fair, timely and understandable disclosure in compliance with all applicable laws and regulations in all reports and documents that the Company files with, or submits to all relevant regulators and in all other public communications made by the Company. All employees must abide by Company policies and procedures designed to promote compliance with this policy.

DATA INTEGRITY

The Company has a data integrity policy that is followed across the organization.

INTELLECTUAL PROPERTY

Intellectual Property is an important asset of the Company and it includes:

- Copyrights
- Patents
- Trademarks; and
- Trade secrets

Every employee is responsible to protect the organization's intellectual property by complying with Strides' policies and procedures for their protection. Maintaining the confidentiality of Strides' trade secrets and proprietary information is an important element of each employee's duty.

DATA PRIVACY

The Company respects your privacy and is committed to protecting your personal data. The Company has put in place a Data Privacy Policy which shall familiarize you with the manner in

which the Company collects and administers personal data collected from various stakeholders in accordance with the provisions of applicable laws. The said policy is available at the intranet portal of the Company.

INSIDER TRADING

Employees should use information received in the course of their business dealings only for the purpose it is intended or normally used and should never be used for personal gain or for a third party's gain. They should also not release confidential data or information to others without proper authorization.

Employees should not deal with securities of the company on their own account or on the account of person of immediate family if they are in possession of material non-public information. If an Employee is in possession of such unpublished price sensitive information, such employee shall not communicate directly or indirectly to those who trade on such information.

Insider Trading invokes severe civil and criminal penalties not only on the Insider but also on the Company in certain circumstances under regulations issued under the Securities and Exchange Board of various countries.

Directors/SMPs/ designated employees (which also includes SMPs) are prohibited by Company policy and the law from buying or selling securities of the Company when in possession of material unpublished price-sensitive information. Passing such information on to someone who may buy or sell securities (commonly termed as “tipping”) is also illegal. The prohibition applies to the Company’s securities and to securities of other companies if the Director/SMP learns of material unpublished price sensitive information relating to other companies, such as the Company’s customers or suppliers, in the course of duties for the Company.

Directors/ SMPs are subject to additional requirements enumerated under the SEBI (Prohibition of Insider Trading) Regulations, 2015.

For more details, you may please refer the Company’s policy on Prevention of Insider Trading.

MATERIAL NON-PUBLIC INFORMATION

Q. What is material non-public information?

A. Any information should be considered as material if an investor considers such information as important for making an investment decision and the same information was not available in the public domain.

Examples:

Earnings or financial performance that has not yet been disclosed to public

- A Change in operations, projections
- A potential merger or acquisition or restructuring
- A potential sale of significant assets or Subsidiaries
- Change in dividend policies
- A significant pricing change
- Major changes in accounting methods
- Significant lawsuit or regulatory investigation

COMPETITION LAWS

While the Company competes vigorously and creatively in its business activities, its efforts in the marketplace must be conducted in accordance with all applicable Competition Act and Regulations. Directors/SMPs should not engage in any activity in violation of applicable Competition Act.

ANTI CORRUPTION LAWS

The Company conducts its business activities in compliance with the Prevention of Corruption Act, 1988 of India and applicable anti-corruption laws of all other countries in which the Company conducts businesses. Under the Prevention of Corruption Act, it is an offence to offer to a ‘public servant’ a gratification or a valuable thing as a motive or reward for doing or forbearing to do any official act. Directors/ SMPs should not, directly or indirectly, engage in any activity that could be construed as the Company being in breach of the Prevention of Corruption Act or any other applicable anti-corruption law.

Further, we also conduct all our import and export activities legally and ethically, adhering to all relevant and applicable trade sanction laws and license requirements. As international laws and regulations are complicated and changes frequently, we strive to remain informed of the latest legal requirements, including current trade sanctions and embargoes.

INTERACTING WITH THE GOVERNMENT

The various branches and levels of government have differing laws that restrict gifts, including meals, entertainment, transportation and lodging that may be provided to a public servant. Directors/ SMPs should not offer to or pay for meals, travel, lodging or any other expenses for public servants in connection with the Company or Company’s business without first consulting with the Legal Counsel of the Company.

FAIR DEALING

Strides competes vigorously but fairly. We comply with all antitrust, monopoly, competition and cartel laws in the places where we conduct business. No bribes, kickbacks or other corrupt payments in any form shall be made directly or indirectly to anyone for the purposes of obtaining or retaining business or for obtaining any other favorable action.

Further, Directors/ SMPs should endeavor to deal fairly with the Company's customers, suppliers, competitors and employees and should never take unfair advantage of others through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice.

Interacting with competitors

Antitrust or competition laws prohibit making agreements with competitors or customers that would restrict competition.

Gathering information about competitors

Strides will obtain information about competitors which is required for conducting business and to decide on strategies only through legitimate sources. You shouldn't obtain information about competitors through unlawful or unethical practices. You shouldn't misinterpret your identity or the business you operate in order to get access to competitors' product/s or service/s.

ANTI MONEY LAUNDERING LAWS

Strides remains committed to comply with all laws that prohibit money laundering or financing for illegal or illegitimate purposes.

Employees at Strides should always ensure to conduct business with reputable vendors and customers, for legitimate business purposes, with legitimate funds and check for 'red flags' such as requests from a potential customers or suppliers for cash payments or other unusual payment terms. If any suspicion for money laundering activities arise, Employees must report it in

accordance with this Code to the Compliance Officer.

CONFIDENTIAL INFORMATION

As part of an employee's position you may have exclusive information or non-public information relating to Strides. If such information is not in public domain you should treat it as confidential information and should not disclose it to anyone unless you are authorized to do so.

Confidential Information means any and all information and material, including without limitation any trade secret, technique, strategy, component, concept, program, report, study, memorandum, correspondence, documentation, information, manual, record, data, technology, product, plan, design, procedure, method, invention, sample, notes, summaries, analyses, compilations and other writings, cell lines and procedures and formulations for producing any such sample, medium, and / or cell line, process, formula or test data relating to any research project, work in progress, future development, engineering, manufacturing, marketing, pricing, billing, servicing, financing, personnel matter, its present or future products, sales, suppliers, clients, customers, employees, investors, or any other information which is generally not available in public domain whether in written, graphic or electronic form and whether or not such information is identified as such by an appropriate stamp or marking.

Every Employee should comply with confidentiality obligations, data protection and privacy laws.

Strides respects confidential information regarding other organization or people, including our customers, business partners and suppliers. If you learn of any confidential information about third party as a result of your position, you should protect it the same way that you would about the confidential information of Strides. Misuse or improper disclosure of confidential information can be harmful for Strides and could be the basis

for legal proceedings against Strides or the person responsible for disclosure.

Collect, use, retain and transfer information of third parties in accordance with the prevailing and all applicable data protection laws, privacy laws and regulations.

MEDIA, PUBLIC AND GOVERNMENTAL INQUIRIES

In order to state our positions and views in a consistent manner, we have official spokespersons at Strides who are trained and qualified to release information to the public. When members of the media, shareholders, financial analysts or government authorities contact Strides to request information, the response can have far-reaching implications, including effects on the Strides stock price and Strides' ability to compete.

When we provide information on our products, operational strategies or financial results, we must ensure both that the information is accurate, and that Strides is ready to "go public" with that information.

In addition, we must comply with the requirements of securities regulatory authorities and stock exchanges about how and when we disclose information. For these reasons, it is critical that only authorized persons should speak on behalf of Strides.

External requests for information

If you receive a request for information from outside Strides (even if it seems like a simple request or innocent question), you must forward it to the corporate communications department.

Public speaking and publications

Before publishing, making a speech or giving an interview in your capacity as a Strides employee or executive - or if a publication, speech or interview might in any way be connected to your position at Strides - you should obtain an

approval from the Corporate Communication Department/ Investor Relations Department / Secretarial Department.

Contact Person

Mr. Sandeep Baid

Chief Investor Relations Officer

Email: Sandeep.baid@strides.com

Phone: +91 80 6784 0791

Ms. Pallavi Panchmatia

Corporate Communications

Email: pallavi.panchmatia@strides.com

Phone: +91 80 6784 0193

Ms. Manjula Ramamurthy

Company Secretary and Compliance Officer

Email: Manjula.R@strides.com

Phone: +91 80 6784 0734

NON-COMPLIANCE

Suspected violations of this Code must be reported to the Chairman of the Board or the Chairman of the Audit Committee. All reported violations will be appropriately investigated.

A Director charged with a violation of this Code should not participate in a vote of the Committee or the Board concerning his/her alleged violation but may be present at a meeting of the Board or Committee convened for that purpose. Directors who violate this Code may be subject to sanctions, up to and including a request to resign as Director or the Board's seeking removal of the Director, where permitted by applicable law.

An SMP charged with violation of this code may be at a meeting of the Board or Committee convened for that purpose of enquiring into the alleged contravention. SMPs who violate this code may be subject to sanctions, up to and including a request to resign from the employment of the Company.

Any waiver of this Code must be approved by the Board of Directors in case of Directors and Managing Director, in case of any other Employees, and publicly disclosed as required by law or regulation.

Raise your voice and report violations and integrity concerns because that protects your Company and stakeholders of the Company. Non-compliance and other integrity issues must be reported immediately. Strides encourage open reporting and non-retaliation.

Refer to the next section to know more on how to report concerns and violations.

DISCIPLINARY ACTIONS AGAINST CODE VIOLATIONS

At Strides, we strive to abide by the Code and any violations will be viewed seriously and disciplinary action / penalty shall be imposed based on the nature and extent of the violation. The disciplinary action may even go to the extent of termination of employment and if warranted, legal proceedings.

How to question and report concerns and violations

If you are uncertain about any situation, you should ask for guidance. Promptly report any unethical or illegal conduct and ask questions when in doubt.

This Code is intended to serve as a guide for your own actions and decisions and for those of your co-workers. If you believe that you or someone you know is in violation of the policies stated in this Code, you have an obligation to report your concerns in a timely manner.

You may use various method of communication with which you feel most comfortable e.g. written or verbal complaint, e-mail etc. The important thing is that you get the guidance that you need, report what you know and get your questions answered.

You may contact us by e-mail at ethics@strides.com

Self-Reporting – You are encouraged to identify yourself to assist us in addressing your concern or reporting an actual or potential violation. In many instances, your immediate resource is your direct manager or supervisor and your Human Resources Business Partner who supports your business. These people may have the information that you need or may be able to refer the matter to an appropriate source.

For work environment-related complaints, such as harassment and discrimination, we encourage you to contact your manager or the Human Resources Business Partner who supports your business.

Confidential and anonymous reporting – We have also established another communication channel that you can use when you have specific concerns or when you want to report an actual or potential violation confidentially and/or anonymously.

For example, there may be times when you prefer not to go to your manager or supervisor, or you may want to report a concern about your manager's or supervisor's conduct. Strides employees may report violations and submit complaints and obtain information, advice and suggestions confidentially and anonymously by e-mail. Confidentiality will be maintained to the fullest extent possible and information will only be shared on a "need-to-know" basis, consistent with the need to conduct an adequate review.

Although e-mail from your office or home computer is not anonymous, you can request that your identity be kept confidential.

Retention of reports and complaints and investigations – The Corporate Compliance and Audit department will maintain a log of all reports and complaints related to accounting, internal accounting controls and fraud related matters, tracking their receipt, investigation and resolution and will prepare a periodic summary of reports and complaints for the Audit Committee.

Information regarding other reports and complaints are maintained by Human Resources and Legal/Compliance as appropriate. Retaliation is prohibited – We will not discharge, demote or suspend you if you provide information or assist in an investigation regarding conduct that you reasonably believe is unethical or that constitutes a violation of law, this Code or our other policies. This commitment includes you giving information in connection with an authorized investigation. However, we reserve the right to take a disciplinary action against you if you make an accusation without a reasonable, good faith belief in the truth and accuracy of the information or if you knowingly provide or make false information or accusations. "Good faith" does not mean that you have to be right — but it does mean that you believe you are providing truthful information. If you believe that you have been unfairly or unlawfully retaliated against, you should immediately notify your Human Resources Business Partner who supports your business, or the Compliance Officer of the Company.

Presumption of innocence – If someone makes a report or complaint against you, you will be presumed innocent unless the investigation reveals a violation has occurred.

Disciplinary process – As noted previously, a violation of law and regulation, this Code or our other policies may result in disciplinary action up to, and including, termination and/or legal proceedings.

Cooperation with an investigation – Employees who are subject to, or interviewed in connection with, an investigation are obligated to cooperate. Failure to cooperate with an investigation includes, but is not limited to: knowingly providing false or misleading information, refusing to be available for contact during the investigation and knowingly withholding or deleting information pertinent to the investigation. Failure to cooperate may result in disciplinary action up to, and including, termination and/or legal proceedings.

Social media interactions - Employees should not participate in any inappropriate use of social media and should not tolerate disrespectful or unprofessional usage of social media such as posting content that is abusive, malicious, obscene, threatening or intimidating, or contains ethnic, religious, gender or other derogatory statements in any message or post that relates to Strides or its group entities, its business, its clients, its business partners, or personnel.

In any such case you can write to: corpcomm@strides.com

The Company shall not be responsible for any comment made by any employee of the Company in any place, including social media, if the information in such comment is not otherwise publicly available.

ISSUANCE AND AMENDMENTS

Our company's Board of Directors is responsible for approving and issuing the Code. The effective date of this Code with revisions is May 18, 2018. Our Code is reviewed periodically to determine whether revisions may be required due to changes in our business or the business environment. The Board of Directors must approve any changes to our Code.

PLACEMENT OF THE CODE ON WEBSITE

Pursuant to the SEBI Listing Regulations, this Code and amendments thereto shall be hosted on the website of the Company.

ACKNOWLEDGEMENT

I acknowledge that I have received the Strides Code of Conduct. I have read the Code of conduct and I acknowledge that as a Strides Employee/ Director, I am required to comply with the guidelines described therein and failure to do so may subject me to action as per my employment/ directorship terms and relevant company policies.

If I have a concern about a violation, or a potential violation of the Code of conduct, I understand that there are channels available to me in my company to report such concerns. By making use of these channels when necessary, I will play my part in upholding the values of the organization to which we hold ourselves.

Signature: _____

Date: _____

Name: _____

Department: _____

(*Please submit this declaration to your HRBPs)

The Director/ SMP should confirm compliance on an annual basis in the format prescribed in **Annexure 1** of the Code and also acknowledge receipt of this Code in the format prescribed in **Annexure 2**.

DUTIES OF DIRECTORS:

In compliance with Section 166 of the Companies Act, 2013, the duties of Directors of the Company are:

- a) A Director shall act in accordance with the Articles of the Company;
- b) A Director shall act in good faith in order to promote the objects of the Company for the benefit of its members as a whole, and in the best interests of the company, its employees, the shareholders, the community and for the protection of environment;
- c) A Director shall exercise his/her duties with due and reasonable care, skill and diligence and shall exercise independent judgment;
- d) A Director shall not involve in a situation in which he/she may have a direct or indirect interest that conflicts, or possibly may conflict, with the interest of the company;
- e) Director shall not achieve or attempt to achieve any undue gain or advantage either to himself or to his relatives, partners, or associates and if such director is found guilty of making any undue gain, he shall be liable to pay an amount equal to that gain to the company;
- f) A Director shall not assign his office and any assignment so done shall be void

CODE AND DUTIES OF INDEPENDENT DIRECTORS:

In compliance with Section 149(8) of the Companies Act, 2013, independent Directors shall:

- a) Uphold ethical standards of integrity and probity;
- b) Act objectively and constructively while exercising his duties;
- c) Exercise his responsibilities in a bona fide manner in the interest of the company;
- d) Devote sufficient time and attention to his professional obligations for informed and balanced decision making;
- e) Not allow any extraneous considerations that will vitiate his exercise of objective independent judgment in the paramount interest of the company as a whole, while concurring in or dissenting from the collective judgment of the Board in its decision making;
- f) Not abuse his position to the detriment of the company or its shareholders or for the purpose of gaining direct or indirect personal advantage or advantage for any associated person;
- g) Refrain from any action that would lead to loss of his independence;
- h) Where circumstances arise which make an independent director lose his independence, the independent director must immediately inform the Board accordingly;
- i) Assist the company in implementing the best corporate governance practices;
- j) Undertake appropriate induction programmes and regularly update and refresh their skills, knowledge and familiarity with the Company;

- k) Seek appropriate clarification or amplification of information and, where necessary, take and follow appropriate professional advice and opinion of outside experts at the expense of the Company;
- l) Strive to attend all meetings of the Board of Directors and of the Board committees of which he/she is a member;
- m) Participate constructively and actively in the committees of the Board in which they are chairpersons or members;
- n) Strive to attend the general meetings of the company;
- o) Where they have concerns about the running of the Company or a proposed action, ensure that these are addressed by the Board and, to the extent that they are not resolved, insist that their concerns are recorded in the minutes of the Board meeting;
- p) Keep themselves well informed about the Company and the external environment in which it operates;
- q) Not to unfairly obstruct the functioning of an otherwise proper Board or committee of the Board;
- r) Pay sufficient attention and ensure that adequate deliberations are held before approving related-party transactions and assure themselves that the same are in the interest of the company;
- s) Ascertain and ensure that the company has an adequate and functional vigil mechanism and to ensure that the interests of a person who uses such mechanism are not prejudicially affected on account of such use;
- t) Report concerns about unethical behavior, actual or suspected fraud or violation of the company's code of conduct or ethics policy;
- u) Acting within his/her authority, assist in protecting the legitimate interests of the Company, shareholders and its employees;
- v) Not disclose confidential information, including commercial secrets, technologies, advertising and sales promotion plans, unpublished price-sensitive information, unless the Board expressly approves such disclosure or is required by law

ANNUAL DECLARATION BY BOARD MEMBERS

To
Strides Pharma Science Limited
Corporate Office: 'Strides House',
Bilekahalli, Bannerghatta Road,
Bangalore – 560 076.

Dear Madam/ Sir,

The undersigned, being a Director of Strides Pharma Science Limited, do hereby affirm my compliance with the Code of Conduct as laid down by the Company in compliance with all such acts and regulations, including Regulation 17 (5) and Regulation 26(3) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, for the financial year ended (*)

I further confirm that I have read and understood the contents of the aforesaid Code of Conduct and shall abide by the same.

Signature : _____

Name : _____

Designation : _____

Place :

Date :

ANNUAL DECLARATION BY SENIOR MANAGEMENT PERSONNEL

To
Strides Pharma Science Limited
Corporate Office: 'Strides House',
Bilekahalli, Bannerghatta Road,
Bangalore – 560 076.

Dear Madam/ Sir,

The undersigned, being a Senior Management Personnel of Strides Pharma Science Limited, do hereby affirm my compliance with the Code of Conduct as laid down by the Company in compliance with all such acts and regulations, including Regulation 17 (5) and Regulation 26(3) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, for the financial year ended (*)

I further confirm that I have read and understood the contents of the aforesaid Code of Conduct and shall abide by the same.

Signature : _____

Name : _____

Designation : _____

Place :

Date :

Frequently Asked Questions:

1. Why should an employee follow the code of conduct?

An employee should follow the Code for reasons stated above and to demonstrate that Strides' conducts its business with honesty, integrity and in a professional manner and to ensure Strides' reputation is intact and employees contribute in protecting values that are dear to Strides.

2. We have a closet full of office supplies like pens, glue sticks and note pads. Can I take some home with me? Will all these items be part of assets?

Taking home any of Strides' assets for non-official work will constitute a deliberate pilferage. However, all office supplies that help in working from home is allowed to be carried with knowledge of your immediate superior. For clarity, assets would be defined as all property that is used by you daily, directly or indirectly for office work. Few common examples would be laptops, computers, iPads, mobile phone, telephone, glass, water bottles, and office stationary items. Should anyone have any doubts on what constitutes assets of the Company, they must immediately seek clarification from the local HR.

3. Can I use Strides e-mail system to send personal messages to friends and family members?

This is Ok, if you are sending limited e-mails and you're primarily using the computer network for business purposes. However, we recommend that you avoid sending highly personal messages from your workplace computer networks.

4. Can I install P2P software like Dropbox or Bit torrent on my work computer in order to share my music, movie files with my friends and colleagues?

No. Strides respects the intellectual property of others as we would expect for our own. Also, certain unapproved software or websites could, compromise the security and integrity of Strides networks.

5. Can I use my personal phone (iPhone, Blackberry, Android, etc.) to access my company e-mail and intranet?

This is allowed provided you understand and follow the guidelines for use of company e-mail and intranet including obtaining manager's approval wherever required.

6. What does close relationship mean for the purposes of this policy?

Contact Secretarial department for clarification under relevant local laws. However, in layman terms, all direct relative, father mother, brother, son, daughter and relationship through marriage shall be deemed as relatives. It is advisable to seek a technical clarification from the Secretarial department.

7. A supplier has invited me for dinner and drinks party at a restaurant. Can I accept his offer?

Yes, you can accept his offer if his invitation is a common business courtesy and is intended to strengthen the relationship.

8. What would constitute personal benefits/gifts?

Any form of gift, favor or entertainment that is beyond routine and for a value above Rs. 3500/- or USD 50 will constitute personal benefits. To further clarify, gifts that you can usually accept or give: Promotional items with company name or brand logo, Prizes received for contests at

conferences, Tickets to local sporting or cultural events, Meals and entertainment of reasonable value when business is being conducted, Gifts acknowledging personal events, such as weddings and births, Small gifts of nominal value customarily given on certain holidays or festivities.

9. What constitutes Bribery?

Bribery means offering, giving, promising, authorizing, attempting to give any gratification to a public servant, directly or indirectly, and includes receiving or soliciting such gratification.

10. A Vendor offers me a percentage of the vendor's margin in exchange for encouraging purchase of the vendor's services and products. Can I accept such a payment?

No. This is a kickback, which is prohibited by Strides Code of Conduct and Anti-Corruption Policy.

11. What are the restrictions that an employee should follow?

No employee will offer any gifts, favors or entertainment to others that are

- a) contrary to our customary business practice,
- b) excessive in value to be construed as a bribe or pay-off in violation of ethical standards, and,
- c) any public disclosure of such payment could harm the image and reputation of Strides.

12. What does close relationship mean for the purposes of this policy?

It means your immediate family or household. In addition your partner, cousin or friend who could influence your objectivity, can be assumed to have close relationship with that person. Also refer the definition of close relationship as answered in Q6.

13. Can I volunteer some of my time for local charity?

Yes, we encourage employees to volunteer for charity and social causes, time can be taken out during working hours with prior permission.

14. Can I volunteer some of my working time for a local political campaign?

No, you can't volunteer for political activities during working hours. You can volunteer for the same outside office working hours.

15. I would like to make a charitable contribution on behalf of Strides that my client supports, will I be reimbursed?

No, all charitable contributions are made after due deliberation by Strides and as per CSR mandate. No employees will be reimbursed for any contribution made without the proper approval process.

16. I am planning to promote one of the employees in my team. There are two prospective employees one man, and the other is woman, who has been talking that she will get married soon and start a family. Can I promote the man if I think that woman is likely to have children soon and might leave Strides?

No. All promotions should be on merit and for work done by the employee and as per the review process. Quality of an employee is to be measured by work performed and not by circumstances that are beyond work related.

17. One of the suppliers makes inappropriate remarks about my appearance and engages in verbal flirtation, I find it unwelcoming. Can I do anything about this?

Strides prohibits harassment and discrimination by our employees, as well as those with whom we have business relationship. You should tell that person that you are uncomfortable with his/her behaviour, if he / she fails to listen you can report to your manager or Human Resource representative.

18. Most of your work is physically performed around a specific person who appears to be interested in you. He often makes flirtatious remarks that make you little uncomfortable. Of late he has started asking you for a date. Should you report his/her behaviour?

Yes, you should report this behaviour to your superior. In such case of harassment, you may also approach your HR to initiate review and action;

19. Is there some where I can go for help or counselling related to drugs or alcohol?

Contact Human Resource Personnel for help, they will share information about any such services available in your location.

20. How should I treat a third party Intellectual property?

All third party intellectual property is to be treated with same amount of care and diligence as you would treat intellectual property of Strides . In some cases, third party intellectual property comes with added restrictions and obligations which can be understood better from your legal team, to ensure proper compliance.

21. What is Strides intellectual property?

All intellectual property that is generated by employees while at work belongs to Strides including development, creative, discoveries, innovations etc.

22. What is insider trading?

Insider Trading generally involves the act of subscribing or buying or selling of the Company's securities, when in the possession of any unpublished price sensitive information about the Company. It also involves disclosing any unpublished price sensitive information about the Company to others who could subscribe or buy or sell the Company's Securities. All forms of insider trading is prohibited by Strides and such practices are also a punishable offence under the applicable law.

23. Why is Insider Trading considered illegal?

Insider trading results in certain persons gaining at the expense of others, by virtue of their possession of unpublished / undisclosed price sensitive information which may result in undermining investor confidence and may adversely impact the capital markets.

24. I learned that Strides is considering the acquisition of a publicly traded company. May I acquire the stock of this company in anticipation of the acquisition?

No, trading on material non-public information is illegal and violation of the Code, whether you are trading on Strides stock or the anticipated Target Company.

25. What would constitute cartelization, anti-competitive practice?

Any form of discussion with competition to create an unfair price increase, which may result in a form of cartelization between the two companies as a consequence of which customer is made to pay more for a product is considered anti-competitive practice. This means we are not to discuss or recommend to competitors any price or share information about pricing, profit margins, sales terms credit terms, promotions and other competitively sensitive information, which may lead to monopolization of a particular product. Further even abstaining from selling a product or service, unethical practices in bidding process or to boycott a particular supplier or vendor may constitute anti- competitive as general public may suffer due to such action.

26. Someone from a competitor just joined Strides. I'd like to learn about a business process and pricing that his/her Former employer uses. Can I ask?

Obtaining competitive information from former or current employees is a delicate matter. Avoid putting yourself and others at such risk. Seek information about our competitors from the Competitor Intelligence group, a team dedicated to obtaining this information in an appropriate legally permissible manner.

27. How can I better protect confidential information?

Some suggestions to protect confidential information - are: utilize password protection in your system; keep files with sensitive information safely in lockers; make sure that there are non-disclosure or confidentiality agreements in place before you share your confidential information to third parties; use encryption for electronic files during storage.

28. Does this policy restrict me from mentioning Strides in my personal blog?

It's OK to mention Strides in your personal blog. However it should not contain any confidential or non-public information related to Strides or its suppliers, customers or other companies we do business with. Any views or opinions that you express in your blog are your own, not those of Strides .

29. Can I retain documents for personal reference after termination/resignation?

No. Company discourages individuals to keep any documents for personal safe keep. However, should any employee demonstrate that, due to pending proceedings in a court of law or before any statutory authority, certain documents would be required, the Company assures to make such documents available as permissible by law at the time required.

30. What should I do if I get a call from the media asking me for information about a proposed acquisition that Strides announced through a press release? Is it OK for me to comment since the news is public?

You should refer the call to your Media/Public Relations department (even if the information is public) unless you are authorized to speak on behalf of Strides. Even if Strides has made a public announcement about a development or transaction, you should not comment.

31. A trade magazine wants to do a feature on one of our new products. Can I speak to the reporter who's writing the story?

You can only comment on or provide press interviews about our products if you have been authorized to do so. Otherwise, you should refer the call to someone who is authorized to speak on behalf of Strides.

32. Can I comment or respond to comments about Strides or any of our businesses in a blog, online chat room or bulletin board?

You should not post any information about our products, stock performance, operational strategies, financial results, customers or competitors, even in response to a false statement or question.

DECISION MAKING FRAMEWORK

