

July 24, 2015

**Bombay Stock Exchange Limited
Corporate Relationship Department
1st floor, New Trading Ring
Rotunda Building, P J Towers
Dalal Street, Fort
Mumbai - 400 001**

Dear Sir/Madam,

**Sub: Confirmation on Compliance with Regulations 8 of SEBI (Prohibition of
Insider Trading) Regulations, 2015**

We wish to confirm that Pursuant to SEBI (prohibition of Insider Trading) Regulations, 2015, the Board has approved the Code of practices and procedures for fair disclosure of unpublished price sensitive information (UPSI) and the same has been uploaded on the Company's website at www.orchidpharma.com.

Kindly take the above on your records.

Thanking you,

Yours faithfully,



L Chandrasekar
CFO & Company Secretary

Code of Practices and Procedures for Fair Disclosure of unpublished price sensitive information

Purpose

Every company, whose shares are listed on a stock exchange, shall formulate and publish on its official website, a code of practices and procedures for fair disclosure ("the Policy") of unpublished price sensitive information ("UPSI") that it would follow in order to adhere to each of the principles as stated in SEBI (Prohibition of Insider Trading) Regulations, 2015 (" the Regulations")

Code of Fair Disclosure of the Company

1. The Company shall promptly disclose unpublished price sensitive information ("UPSI") that would impact price discovery will be intimated to the Stock Exchanges immediately on any such credible and concrete information coming to the knowledge of the Company.
2. The Company shall follow uniform and universal dissemination of UPSI to avoid selective disclosure.
3. The Board of Directors designated the Managing Director of the Company as of the Company to deal with dissemination and disclosure of UPSI.
4. In case of any UPSI getting disclosed selectively either inadvertently or otherwise, the Managing Director shall ensure prompt dissemination of UPSI as generally available, to the Stock Exchanges and also the website of the Company.
5. The Company shall ensure appropriate and fair response to queries on new 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 UPSI.
7. The Company shall develop best practices to make transcripts or record of proceedings of meetings with analyst and conference call with investors/analysts are promptly published on the official website of the Company to ensure official confirmation and documentation of disclosures made.
8. The Company shall handle all UPSI on a need to know basis.
9. Any Amendment of the Policy, upon approval of Board of Directors of the Company shall be intimated to the Stock Exchanges and shall also be updated in the Company's website.
