



CENTURY PHARMACEUTICALS LIMITED

Code of conduct articulates Management, Business practice and employee wide standards in the following areas:

Personal Conduct of Employees

- Employees must comply with the law
- CENTURY PHARMACEUTICALS LTD expects its employees to live by the corporate values: honesty, quality, entrepreneurship and responsibility
- Where no legislation or rules govern personal conduct, each employee must exercise sound judgment and due care. Whenever in doubt, employees should raise their questions with a superior or another responsible staff member
- Customers, colleagues and other business partners must be treated with respect and fairness
- Harassment, including sexual harassment, is unacceptable at CENTURY PHARMACEUTICALS LTD
- CENTURY PHARMACEUTICALS LTD demands that employees perform their work without the influence of alcohol or drugs

Anti-Corruption and Bribery

- CENTURY PHARMACEUTICALS LTD is against any form of corruption and bribery and committed to combating such practices
- CENTURY PHARMACEUTICALS LTD competes for business on fair terms and solely on the merits of its services
- Regardless of local practice, any personal payments, kick-backs or bribes between CENTURY PHARMACEUTICALS LTD and customers, suppliers or public servants are strictly prohibited
- It is unacceptable to receive gifts or other gratuities from business partners unless customary in the environment and of a modest value

Compliance with Competition Laws

- Compliance with all applicable competition rules and regulations lies at the heart of CENTURY PHARMACEUTICALS LTD business practice

- CENTURY PHARMACEUTICALS LTD does not arrange with competitors to fix prices, allocate services, sales quotas or divide markets
- CENTURY PHARMACEUTICALS LTD does not engage in bid rigging or exchange information on tenders with competitors
- CENTURY PHARMACEUTICALS LTD does not discuss competitive issues (such as pricing, discounts, bonuses, sales terms etc.) with competitors

Business Partner Relations

- CENTURY PHARMACEUTICALS LTD will inform its suppliers and customers through appropriate channels about the CENTURY PHARMACEUTICALS LTD Code of Conduct and ask them to take the principles into account in all relevant circumstances
- The CENTURY PHARMACEUTICALS LTD service delivery will meet agreed standards for quality, health and safety at customer sites
- Customer privacy is respected and applicable data protected
- Complaints are addressed effectively, and they are considered a valuable contribution to constantly ensuring high levels of service
- CENTURY PHARMACEUTICALS LTD evaluates its procurement of products and services against the following criteria: Quality, Efficiency, Environment and Employees (Q3E)

Workplace Standards

- CENTURY PHARMACEUTICALS LTD ensures proper working conditions for its employees, including appropriate health and safety standards
- CENTURY PHARMACEUTICALS LTD tolerates no form of discrimination against employees; all employees are entitled to fair and equal treatment
- CENTURY PHARMACEUTICALS LTD respects the freedom of association and the right to collective bargaining; all employees have the right to join and form trade unions
- CENTURY PHARMACEUTICALS LTD uses no forced or compulsory labour
- In accordance with international conventions, CENTURY PHARMACEUTICALS LTD avoids employing children
- CENTURY PHARMACEUTICALS LTD offers adequate wages, that - as a minimum - comply with local agreements and regulations
- CENTURY PHARMACEUTICALS LTD supports the introduction and upholding of minimum wages policy of government.

- Employees are offered training opportunities relevant to the function they perform
- Century Pharmaceuticals ltd respects employee privacy and protects applicable data accordingly

Corporate Responsibility

- CENTURY PHARMACEUTICALS LTD respects the Government declaration of Human Rights
- CENTURY PHARMACEUTICALS LTD operates according to principles of good corporate governance
- CENTURY PHARMACEUTICALS LTD is committed to continuously reducing adverse environmental effects of its operations
- CENTURY PHARMACEUTICALS LTD acts as a good corporate citizen in all societies where it operates
- The social, environmental and ethical commitments of CENTURY PHARMACEUTICALS LTD must be reflected in all dealings with customers, employees, suppliers and other stakeholders

May 2000

**Janak Sheth
Managing Director**