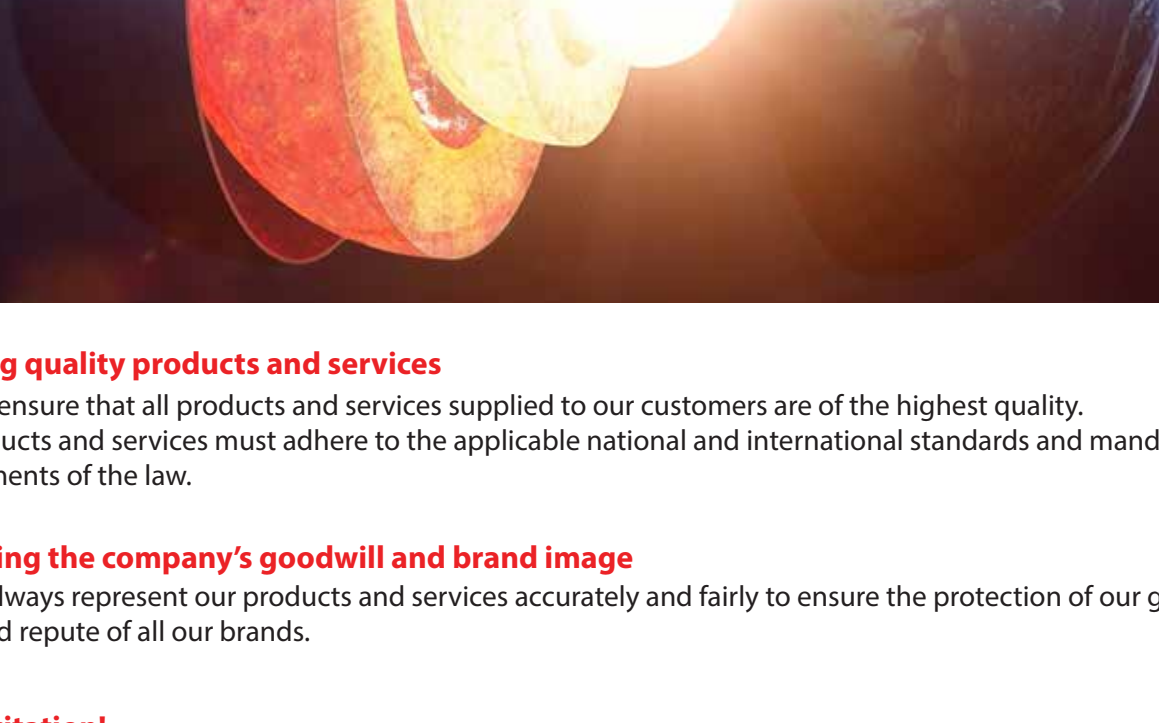




A way of life for every Orelian

The Orel Corporation Integrity Code has been formulated to ensure that all Orelians are aware of the high moral standards that all of us are expected to live up to. No one at Orel Corporation is exempt from observing this Code. The most important thing to note is that these guidelines for conducting ourselves in the business world should not be seen as a list of rules and regulations, but more as the spirit that should be adopted in conducting ourselves.

Our customers are at the center of it all



Ensuring quality products and services

We shall ensure that all products and services supplied to our customers are of the highest quality. Our products and services must adhere to the applicable national and international standards and mandatory requirements of the law.

Protecting the company's goodwill and brand image

We will always represent our products and services accurately and fairly to ensure the protection of our good name and repute of all our brands.

No solicitation!

We shall not directly or indirectly solicit favours (monetary or otherwise) from our customers.

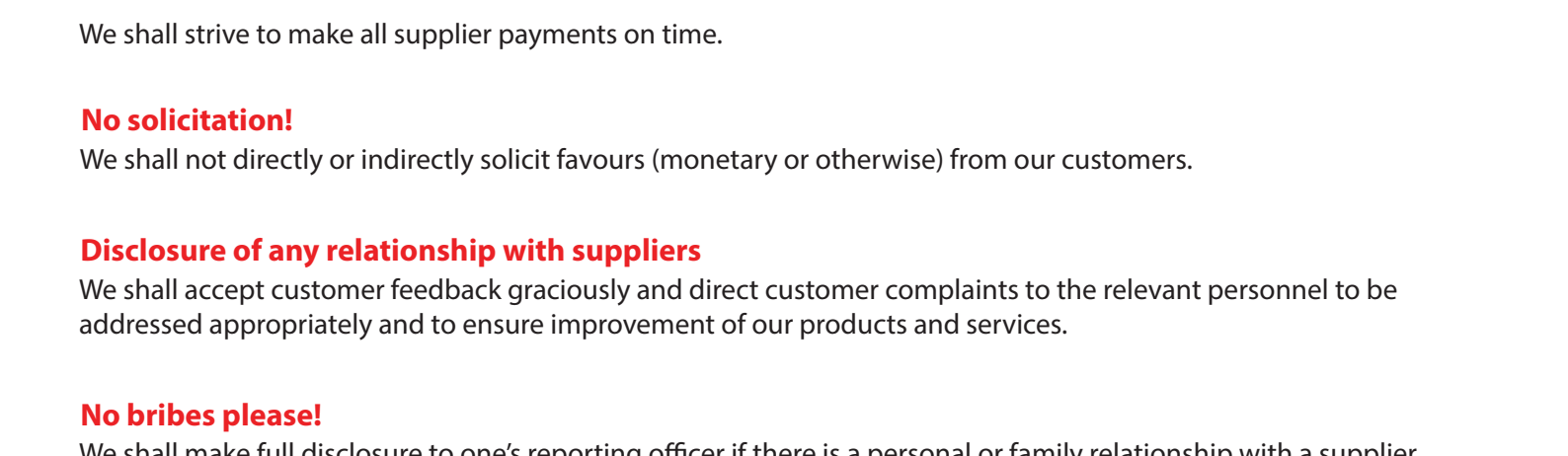
Customer feedback

We shall accept customer feedback graciously and direct customer complaints to the relevant personnel to be addressed appropriately and to ensure improvement of our products and services.

No bribes please!

We shall accept customer feedback graciously and direct customer complaints to the relevant personnel to be addressed appropriately and to ensure improvement of our products and services.

We treat our suppliers as our partners



Merit based selections

We will always ensure that selection of suppliers are based on merit by consideration of factors such as price, quality, delivery, capability, reputation for service and their overall relationship with our company. We will not engage suppliers who employ child labour or suppliers who intentionally violate labour laws.

No improper payments

We shall not solicit monetary payments, loans, kickbacks, gifts or bribes or any other form of money or its value directly or indirectly from a supplier.

We shall strive to make all supplier payments on time.

No solicitation!

We shall not directly or indirectly solicit favours (monetary or otherwise) from our customers.

Disclosure of any relationship with suppliers

We shall accept customer feedback graciously and direct customer complaints to the relevant personnel to be addressed appropriately and to ensure improvement of our products and services.

No bribes please!

We shall make full disclosure to one's reporting officer if there is a personal or family relationship with a supplier. We shall disclose any potential cause for conflict of interest that we may have with any supplier. In order to maintain independence in carrying out one's duties, we are expected to avoid creating personal friendships with suppliers.



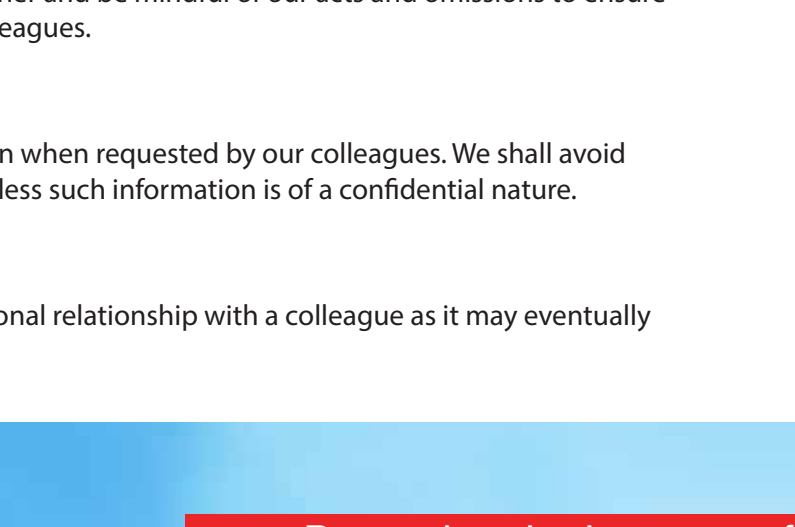
How we treat our competitors is a reflection of our character

Let's compete, but fairly!

We are all expected to play our part in driving the growth of our company, either directly or indirectly. To that end, we will strive to be efficient, innovative and dynamic. We will work as a team to promote our products and services. However, we will not push the boundaries of fair play in our quest to gain market share.

We shall not engage in any unlawful, unethical or immoral practices to promote our products and services. No amount of new business can compensate the tarnishing of the good name and repute of our company.

Our colleagues are our family



Let's treat each other professionally

We shall act with honesty, integrity and professionalism and always be courteous in our dealings with Our fellow colleagues.

No discrimination

We shall not discriminate amongst colleagues based on race, religion, origin, ethnicity, sex, age, disability, marital status, nationality or any other similar grounds.

A work place free of intimidation

We shall not create an intimidating or offensive work environment for our colleagues. We will refrain from making racist, sexist or ethnic comments or jokes to or about our colleagues.

Sexual harassment will not be tolerated

We will abstain from making inappropriate sexual advances or inappropriate physical contact or publish, transmit or display sexually oriented gestures, pictures, jokes or statements to colleagues.

Be aware of health and safety of our colleagues

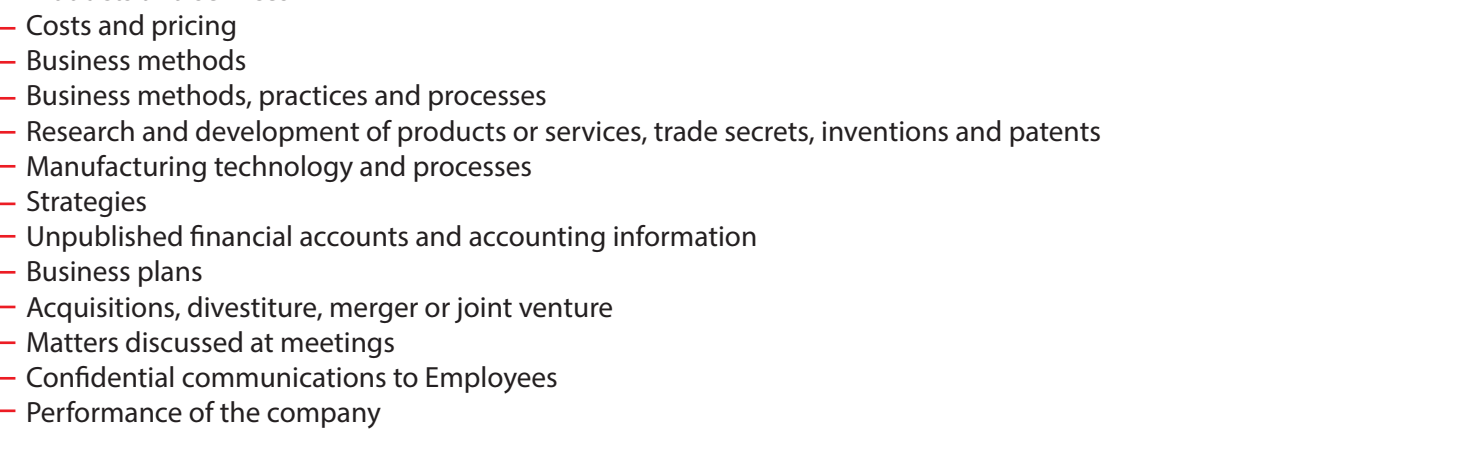
We will ensure a healthy and safe work place for each other and be mindful of our acts and omissions to ensure That we do not endanger the health or safety of our colleagues.

Sharing information with colleagues

We will provide timely, relevant and accurate information when requested by our colleagues. We shall avoid suppression of relevant information from each other unless such information is of a confidential nature.

We will keep our relationships professional

We will refrain from getting involved in any kind of personal relationship with a colleague as it may eventually affect the working environment.



Promoting the interests of our company

Avoid situations of conflict of interest

We will, at all times act in the best interest of our company. We will strive to avoid conflicts of interest with our company. A conflict of interest occurs when we permit a personal interest, family interest or an interest of a third party to take precedence over the interest of our company.

No competition with our brands

We shall not directly or indirectly carry on, or be engaged in, be concerned with, be interested in any business that competes with our portfolio of brands. We will not enter any unauthorized business relationship of any form with competitors. We will disclose to our respective superior if any immediate family member (i.e. spouse, parents, siblings or children) either owns or operates any business that competes with any of our brands.

No concurrent employment

We shall not work on a full-time basis for another employer whilst employed at Orel Corporation.

Protection of corporate assets

We shall not misuse the assets of the company and ensure to use such assets only for its intended purposes. The company assets will be used efficiently and properly for the benefit of the company. We will always prevent the misuse, loss and unauthorized use of company assets and ensure that company assets are not used for our own personal benefit.

We will adhere to the following:

- We will ensure that expenditures are for legitimate business purposes and in accordance with corporate policies
- We shall not use company premises or resources for personal work or any external business
- We shall keep accurate and complete records of funds spent
- We shall not engage in personal activities during work hours

Confidentiality

We shall ensure that confidential information of the company is kept secret even after cessation of employment with Orel Corporation.

Confidential information is any information that is not publicly known which an Employee may receive or is privy to as a result of being employed. This includes but is not limited to information relating to:

- Employees (including non-executive directors), consultants, suppliers, distributors and customers
- Products and services
- Costs and pricing
- Business methods
- Business methods, practices and processes
- Research and development of products or services, trade secrets, inventions and patents
- Manufacturing technology and processes
- Strategies
- Unpublished financial accounts and accounting information
- Business plans
- Acquisitions, divestiture, merger or joint venture
- Matters discussed at meetings
- Confidential communications to Employees
- Performance of the company

Confidential Information can only be disclosed to persons who are authorized to receive such confidential information on a need to know basis. If any one of us is in doubt, we should obtain authorization and clarification from our reporting officers on the suitability of divulging information to any third party.

Confidentiality also includes taking measures to protect the confidential information to the care or custody of the Employee. We must ensure that such confidential information is not misused and/or stolen.

We shall refrain from divulging or discussing confidential information with any unauthorized persons including colleagues, friends, family members or business acquaintances.

If there is a legitimate business that needs disclosure of confidential information to an external party, we must ensure that a non-disclosure agreement is executed before providing confidential information to such a party.

We shall also ensure the protection of confidentiality of any confidential information concerning an external party that is provided to the company.

Intellectual property

Intellectual property includes without limitation trademarks, service marks, trade dress, logos, trade names, corporate names, inventions, patents, specifications, undisclosed information, processing instructions, trade secrets, research and development, know-how, formulas, clinical and laboratory studies, compositions, manufacturing processes, technical data, designs, copyrightable works, website content and domain names.

We and employees will only be granted access to intellectual property for the purpose of performing our duties and functions and such access does not confer any right, title or interest on employees. We must at all times protect the secrecy of intellectual property that constitutes confidential information.

We shall also respect the right, title, interest or ownership of intellectual property of third parties transacting with our company and extend the same duty of secrecy to them.

Use of Information Technology resources responsibly

We shall use information technology resources including internet and e-mail solely in connection with the business of the company. We are expected to exercise restraint in the usage of such resources for personal use.

Protection of our company's reputation

We shall conduct ourselves properly, ethically and professionally and with honesty, integrity and courtesy conforming to the highest moral and ethical standards as our actions reflect on the reputation of our company.

Compliance with laws and regulations

The laws and regulations of Sri Lanka and the laws of any country where we are required to carry out duties bind us. Accordingly, we shall ensure strict compliance with all the relevant laws and regulations.

Compliance of the Orel Corporation integrity code

This code shall apply to all of us who are employed at Orel Corporation. It constitutes the company's pledge to guarantee the highest standards of integrity amongst employees and the relationships between employees, customers, suppliers, shareholders and others in the communities where we live and work.

We are expected to read this code carefully. Any queries, clarifications and issues concerning compliance requires to be addressed to the reporting officers or respective Heads of Departments or to the Legal Department.

