

THE CURALEA CODE OF ETHICS

CurAlea firmly believes in demonstrating the highest standards of ethics in dealings with all our stakeholders. Our Code of Ethics provides the principles that guide us in all our activities. These principles shall be adhered to by all the employees of CurAlea.

Business Integrity

CurAlea is committed to maintaining a high degree of integrity in all its business activities. In particular, CurAlea and its employees shall

- Not indulge in bribery, either directly or through agents, for business gain. Where facilitating payments of small amounts are required to be made in accordance with local practices for hastening routine administrative services, these shall be done using mechanisms that ensure adequate transparency and fairness.
- Not give gifts or provide entertainment to clients or potential clients that can be construed to be bribery in lieu of past, current or future business contracts. We shall ensure that we put in place and adhere to a comprehensive gift and entertainment policy.
- Ensure that we avoid interests that conflict with the interests of the company. Our employees shall not use their positions for personal gain. We shall have adequate mechanisms for disclosure of potential conflicts of interest situations.
- Obey the laws of the countries where we carry out business assignments.
- Ensure that globally recognized expectations of business integrity are followed consistently, whether legally stipulated or otherwise.

Clients

CurAlea is committed to rigorous principles in our dealings with existing and potential clients. We shall:

- Aim to offer only those services that we genuinely believe will add value to our clients. Our pre-contract discussions with clients will involve a high degree of transparency on the value that we believe we will be able to bring to their businesses.
- Aim at all times to deliver the highest quality results to our clients, underpinned by independence and objectivity.
- Meet our contractual obligations and engagement terms in a fair manner.
- Be fair and transparent in the fee that we charge, and be willing to link part of our remuneration with the value addition that we make to our clients' businesses.
- Avoid conflicts of interest or undue influence in the execution of client engagements.
- Preserve client and business confidentiality and privacy. Use information and assets belonging to our clients in a responsible manner

- Strive to do business with clients who respect and share our values.

Employees

CurAlea is committed to providing a work environment that is professional, growth-oriented and empowering. We shall:

- Recruit employees based solely on their qualification and the abilities needed for performing their jobs.
- Provide employees appropriate opportunities for professional and personal development.
- Promote employees based solely on their performance, merit and potential to handle higher responsibilities.
- Recognize the work-life balance needs of employees and consider these in the design our work practices.
- Encourage an open and healthy work environment where there is mutual trust and respect, employees feel motivated to give off their best and where everyone takes ownership for the company's performance and reputation.
- Provide a safe and healthy work environment that is free from harassment and discrimination and where individual privacy is protected.
- Not use any form of forced, compulsory or child labor.

Business Partners

CurAlea is committed to establishing mutually beneficial relations with our business partners and associates. We shall:

- Adopt fair business practices in our dealings with business partners
- Respect non-compete clauses that may be part of our agreements with business partners and expect them to do so as well.
- Expect our business partners to adhere to business principles consistent with our own.

Competition

CurAlea believes in vigorous yet fair competition. We shall engage in competition practices that are fair, ethical and legal.

Community

CurAlea believes in being a responsible corporate citizen and playing a meaningful role in fulfilling our responsibilities towards the communities that we interact with. We shall:

- Invest the time necessary to further the pool of knowledge that exists in the functional

areas where we operate.

- Co-operate with industry associations, academic institutions and other bodies in the development of norms, guidelines and best practices in the areas we specialize in.
- Involve in community development activities that are aligned with our core skills and abilities and are in sync with the size of our business.

Compliance

Compliance with the Code of Ethics is an essential part of our business. We shall:

- Take serious note of any potential instances of non-compliance that come to our knowledge and ensure that these are investigated and appropriate remedial action taken.
- Ensure that our employees read and understand the Code and provide periodic assurance on their compliance thereto.
- Have in place mechanisms for employees to report potential non-compliances in confidence.

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