

STATEMENT OF ETHICS AND BUSINESS PRACTICES

The policy of Engro Corporation Limited, as stated over the years by the Board of Directors, is one of strict observance of all laws applicable to its business.

Our policy does not stop there. Even where the law is permissive, Engro Corporation chooses the course of highest integrity. Local customs, traditions and mores differ from place to place, and this must be recognized. But honesty is not subject to criticism in any culture. Shades of dishonesty simply invite demoralizing and reprehensible judgments. A well-founded reputation for scrupulous dealing is itself a priceless company asset.

An overly-ambitious employee might have the mistaken idea that we do not care how results are obtained, as long as he gets results. He might think it best not to tell higher management all that he is doing, not to record all transactions accurately in his books and records, and to deceive the Company's internal and external auditors. He / she would be wrong on all counts.

We do care how we get results. We expect compliance with our standard of integrity throughout the organization. We will not tolerate an employee who achieves results at the cost of violation of laws or unscrupulous dealing. By the same token, we will support and we expect you to support, an employee who passes up an opportunity or advantage which can only be secured at the sacrifice of principle.

Equally important, we expect candor from all employees and compliance with accounting rules and controls. We don't want liars for employees, whether they are lying in a mistaken effort to protect us or to make themselves look good. One of the kinds of harm which results when an employee conceals information from higher management and the auditors is that other employees within his organization think they are being given a signal that company policies and rules, including accounting and control rules, can be ignored whenever inconvenient. This can result in corruption and demoralization of an organization. Our system of management will not work without honesty, including honest book-keeping, honest budget proposals, and honest economic evaluation of projects.

It has been and continues to be Engro Corporation's policy that all transactions shall be accurately reflected in its books and records. This, of course, means that falsification of its books and records and any off-the-record bank accounts are strictly prohibited.

This policy is in accord with the previously stated policies of Engro Corporation Limited.