

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

1.0 Purpose:

To outline the standards of conduct, promote honest and ethical conduct of employees in all aspects of business at Jeevan Scientific Technology Limited, hereafter referred as Jeevan.

2.0 Scope:

Applies to employees of permanent, probationers, trainees, contractual staff at Jeevan.

3.0 Policy Details:

Table of Contents

3.1	INTRODUCTION
3.2	YOUR EMPLOYMENT
3.3	EQUAL EMPLOYMENT OPPORTUNITY
3.4	NON-HARASSMENT/NON-DISCRIMINATION
3.5	EMPLOYEE PROBLEM SOLVING PROCEDURE
3.6	COMPLIANCE PROCEDURES
3.7	CONFLICT OF INTEREST
3.8	FINANCIAL STATEMENTS AND SEBI REPORTING
3.9	ACCURACY OF RECORDS:
3.10	FRAUD, MISAPPROPRIATION, THEFT, EMBEZZLEMENT AND BRIBERY:
3.11	INSIDER TRADING LAWS
3.12	DISCLOSURE OF MATERIAL NON-PUBLIC INFORMATION
3.13	ANTITRUST LAWS
3.14	PROPRIETARY INFORMATION
3.15	TRANSACTIONS WITH GOVERNMENT
3.16	DOMESTIC / FOREIGN MARKETING PRACTICES
3.17	USE OF COMPANY RESOURCES
3.18	ENVIRONMENT, HEALTH AND SAFETY
3.19	EXPORT CONTROL LAWS
3.20	PREVENTION OF VIOLENCE IN THE WORKPLACE
3.21	INSPECTION/PRIVACY
3.22	ALCOHOL AND DRUG FREE ENVIRONMENT

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

3.23	RELATIONSHIP WITH CUSTOMERS, VENDORS AND COMPETITORS AND ASSOCIATES:
3.24	SECURITY
3.25	MISCONDUCT
3.26	DISCLAIMER

3.1 INTRODUCTION:

The Mission Statement, Business Objectives and Guiding Principles of Jeevan Scientific Technology Limited (Jeevan) provide employees with general guidance for their conduct of business operations. The Employee Code of Conduct (the "Code") further defines the legal and ethical standards that govern all employees and their relationships with Jeevan, with customers, with fellow employees and with all other parties. This Code is designed to deter wrongdoing and promote:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.
- Full, fair, accurate, timely, and understandable disclosure in reports and documents that Jeevan files with, or submits to, the Securities Exchange Board of India ("SEBI") and in other public communications made by Jeevan.
- Compliance with applicable governmental laws, rules and regulations
- The prompt internal reporting to the concerned specified in this Code about any violations of this Code and
- Accountability for adherence to this Code.

This Code has the full support and commitment of the Board of Directors and Management and is applicable to all Jeevan employees, unless otherwise provided by local law.

Jeevan is committed to conduct all business in full compliance with all laws, both domestic and foreign. Jeevan views seriously its commitment to legal and ethical business conduct, and expects all of its employees to ensure that this commitment is met. All employees must be aware of the laws that affect their jobs and should carry out their responsibilities lawfully. Employees must adhere to the standards of conduct outlined in the Code and act in a professional, legal, and ethical manner at all times. They must avoid situations which impair the performance of their official

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

responsibilities or which may have the appearance of impropriety.

Jeevan management is generally responsible for administering and enforcing this Code. HR personnel shall manage application of the Code throughout the company. Any questions about this Code or any ethical, legal or compliance requirements should be addressed to your supervisor/manager.

Each employee must sign an "Acknowledgement Form" (see attachment at the end of the Code) that the employee has read the Code, understood and that the employee agrees to abide by its provisions. By joining or continuing employment with Jeevan, each employee agrees to follow the Code and all policies in force as applicable at any given time. Disciplinary action, up to and including termination, may be taken against anyone who violates any provision of this Code or other company policies. The Company reserves the right, at its sole discretion, to change the Code or waive any provision thereof at any time, for any or no reason, and with or without prior notice.

3.2 YOUR EMPLOYMENT

The Code is not intended in any way to constitute a contract of employment. Your employment relationship with Jeevan is "at-will" as mentioned in the "At Will" section of the Employment Agreement. Jeevan makes no guarantee of employment of any type, and no employee of Jeevan is authorized to guarantee employment to you for any given length of time or promise you (or cause the Company to assume) any greater employment obligation than provided in this policy or in your Employment Agreement.

3.3 EQUAL EMPLOYMENT OPPORTUNITY:

Jeevan is an equal opportunity employer and does not discriminate against any employee or applicant on the grounds of sex, race, color, religion, age, national origin, citizenship, sexual orientation, disability, veteran status, or for any other reason prohibited by central, state, or local law. This policy applies to all of our employment practices, including recruitment, employment, placement, training, promotion, compensation, retention and termination of employees, as well as to other terms and conditions of employment. It is our goal to ensure that hiring, transfer,

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

promotion, compensation, discipline, and termination decisions are based upon the job-related qualifications and abilities of employees and applicants.

3.4 NON-HARASSMENT/NON-DISCRIMINATION:

It is Jeevan's policy to provide a work place that is free of harassment or discrimination by supervisors, other employees or outside parties conducting business with Jeevan. Jeevan prohibits all forms of unlawful harassment or discrimination based upon sex, race, color, religion, age, national origin, citizenship, sexual orientation, disability, veteran status, or for any other reason prohibited by central, state, or local law. Jeevan will take all necessary steps to ensure that each employee's work environment is free from such unlawful harassment or discrimination. Any employee, who believes he or she has been subjected to such discrimination or harassment, or believes he or she has observed another employee, vendor or customer being subjected to such discrimination or harassment, must report that fact immediately to Human Resources. Anyone who has been found, after investigation by Jeevan, to have violated this policy will be subject to appropriate discipline, which may include termination of employment, at the sole discretion of Jeevan.

A. Unlawful Harassment or Discrimination Prohibited:

We will not tolerate any of the following types of behavior: (1) making unwelcome sexual advances or requests for sexual favors or other verbal or physical conduct of a sexual nature a condition of another employee's continued employment; or (2) making submission to or rejection of such conduct the basis for employment decisions affecting another employee; or (3) stating or implying that a particular employee's advances in employment have resulted from the granting of sexual favors or the establishment or continuance of a sexual relationship; or (4) stating or implying that a particular employee's performance problems are due in whole or in part to the sex of that person; or (5) commenting on particular characteristics associated with a particular sex; or (6) creating an intimidating, hostile, or offensive working environment by such conduct. The types of harassing or discriminatory behavior described in items 3 through 6 are also prohibited when based on an employee's race, color, religion, age, national origin, citizenship, sexual orientation, disability, veteran status, or other status protected by law.

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

B. Complaint Procedure:

Any employee, who believes he or she has been subjected to such discrimination or harassment, or believes he or she has observed another employee, vendor or customer being subjected to such discrimination or harassment, must report that fact immediately to Human Resources pursuant to the Employee Problem Solving Procedure set forth below.

3.5 EMPLOYEE PROBLEM SOLVING PROCEDURE:

It is and always has been Jeevan's policy to provide our employees with a professional work environment. Jeevan sincerely believes in treating all of its employees with fairness, dignity and respect. The Employee Problem Solving Procedure provides a prompt and equitable means of addressing employee concerns. Jeevan realizes that, on occasion, you may have a job-related problem. It is important that you have the opportunity to voice your opinion and to resolve such issues as they arise.

A. Harassment, Discrimination and Retaliation Complaints:

If your complaint involves discrimination, harassment or retaliation, you should contact Jeevan's Human Resources Department directly. A report or complaint of discrimination, harassment or retaliation will be investigated pursuant to the "Compliance Procedures" set forth below, and remedial action will be taken as appropriate. To the extent possible, the investigation will be conducted in a manner calculated to protect the privacy of the individuals involved, and the confidentiality of the complaint.

B. Reporting Suspected Illegal Or Unethical Activity:

Any employee who, during the course of employment, learns of illegal or potentially illegal conduct by others, including but not limited to any violation of this Code, or believes that he or she has been asked or required to engage in an illegal or unethical act or an act which would violate this Code, must report that information promptly to either: 1) his/her supervisor/manager, who shall transmit the information to the Human Resources Department; or 2) the Human Resources Department or Managing Director directly. Reports of suspected illegal or unethical activity would be addressed pursuant to the "Compliance Procedures" described below. All reports will

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

be treated confidentially.

C. Other Work-Related Issues:

For any other work-related issues or complaints, you are encouraged to go to your immediate supervisor/manager who will assist you in its resolution. If you feel uncomfortable approaching your immediate supervisor, or you are not satisfied with his/her proposed resolution to your problem, you should contact the next appropriate level of management or Human Resources. If a satisfactory solution to the problem is not reached, you may then submit your concern in writing to the Managing Director, who will conduct whatever investigation is deemed necessary. Decisions made by the Managing Director will be final.

D. Non-Retaliation:

Jeevan strictly prohibits retaliation against an employee who, in good faith, has made a complaint under this procedure or cooperated in an investigation. If you believe that you have been retaliated against for exercising your rights under this policy, please let us know by using the Employee Problem Solving Procedure. Any employee who, after investigation, is found to have retaliated against another employee filing a complaint or for participating in an investigation may be subject to appropriate discipline up to and including immediate termination. However, filing a complaint that you know to be false is strictly prohibited and subjects you to appropriate discipline, including termination.

3.6 COMPLIANCE PROCEDURES:

A. Investigation:

Upon receiving a report of harassment, discrimination or retaliation, Human Resources, in consultation with the Managing Director, when appropriate, shall promptly:

- 1) Conduct an investigation of the allegations;
- 2) Refer supervision of the investigation to the Office of the General Counsel, if warranted; and
- 3) Report to other members of management when appropriate.

Upon receiving a report of other suspected illegal or unethical conduct, Jeevan

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

management, the Managing Director shall promptly:

- 1) Determine whether the report merits investigation;
- 2) Conduct an investigation of the allegations;
- 3) Refer supervision of the investigation to the Office of the General Counsel, if warranted; and
- 4) Report to other members of management when appropriate.

No employee alleged to be involved in any misconduct might be involved in any level of the decision-making process.

B. Cooperation:

An effective investigation requires the support of all employees. Anyone who fails to cooperate in an investigation may be subject to appropriate discipline, including termination. Employees who refuse to implement remedial and corrective measures or who obstruct remedial and corrective efforts also may be subject to appropriate discipline, which could include termination.

C. Discipline:

If, after investigation, it is determined that a violation of the Code or illegal or potentially illegal conduct has occurred, the matter will be referred to appropriate management personnel for:

- 1) Discipline of the wrongdoers by the appropriate sanction, up to and including termination; and or
- 2) Discipline of the responsible individuals, if any, who reasonably should have prevented or detected the wrongdoing.

D. Disclosure to Authorities:

If it is determined that criminal activity has occurred, the Human Resources, through the Office of the Managing Director, shall also:

- 1) Where warranted, report the activity to the appropriate governmental authorities; and
- 2) Cooperate with these authorities to the extent required by law.

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

E. Waivers:

The Code applies to all employees of Jeevan. There shall be no waiver of any part of the Code, except (i) in the case of employees other than executive officers, with the prior written approval of the Managing Director, and (ii) in the case of executive officers, with the prior approval of the Board of Directors. A waiver may be granted only in appropriate circumstances following disclosure to the appropriate body of the relevant facts and circumstances.

3.7 CONFLICTS OF INTEREST:

All employees must avoid conflicts of interest. A conflict of interest exists when an employee's personal or family activities or financial affairs adversely influence the judgment or loyalty required for the performance of one's duties to Jeevan. If an employee suspects even the appearance of a conflict of interest or is in doubt about a particular situation, the employee should promptly notify his or her supervisor. The supervisor will then consult with the Human Resources.

Jeevan employees should not engage in activities with any outside business organization that may result in a personal benefit to the employee at Jeevan's expense, or that may influence the employee's decisions on matters involving Jeevan and the outside business organization. "Outside business organization" means any person, partnership, firm, or other entity that supplies (or seeks to supply) any goods or services to Jeevan, or that transacts (or seeks to transact) any business which will result in payment from or to Jeevan.

Following is a list of actions, which constitute either the appearance of a conflict of interest or an actual conflict of interest. The list is not intended to be comprehensive, but merely a guide to assist you in identifying situations, which may give rise to a conflict of interest. Employees may not take these or any other actions that may result in a conflict of interest, unless a waiver is first obtained from the Jeevan Management,

- Acceptance by an employee of any secondary employment with its customers, vendors, and competitors if it harms the competitive interests of Jeevan.
- Acceptance by an employee of any secondary work that negatively impacts the fulfillment of their duties at Jeevan.

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

- Having any financial interest in companies that are customers, vendors, competitor, or partners of Jeevan, if it could lead to a conflict of loyalty with Jeevan or create the appearance of such a conflict.
- Acceptance by any employee of an offer to serve as an officer, director, partner, consultant, employee or agent of any outside business organization.
- Use of nonpublic Jeevan or customer information to advance an employee's personal or financial interests, or the interests of family or friends. "Family" includes an employee's spouse, parents, children, siblings, mothers and fathers-in-law, sons and daughters-in-law, cousins, and brothers and sisters-in-law and any other person living in the employee's household or outside the employee's household.
- Making referrals to any outside company, business entity or people who provides goods or services of any type that are available through or from Jeevan.
- Investment by any employee or family member in any outside business organization if such investment would result in the employee or family member having the ability or opportunity to influence transactions between Jeevan and the outside business organization, or an investment in any competitor of Jeevan.

Passive investments in publicly traded companies shall not be deemed a violation of this section if you or your family member owns less than 5% of such companies publicly traded stock.

3.8 FINANCIAL STATEMENTS AND SEBI REPORTING

It is Jeevan's policy that each of the reports and documents it files with or submits to the SEBI, and each of the other public communications it makes ("Public Disclosures") contain full, fair, accurate, timely and understandable disclosure. To the extent not already reported, employees with such knowledge must report any of the following deficiencies ("Disclosure Deficiencies") to the Human Resources:

- Financial statements that are to be included in a Public Disclosure that (x) are not prepared in accordance with generally accepted accounting principles; (y) are not prepared in accordance with Jeevan's most recent accounting practices; or (z) do not fairly or accurately present the financial condition, results of operations and cash flows of the applicable division or of Jeevan as a whole.
- Any untrue statement of a material fact or an omission of a material fact necessary to make the statement not misleading that is to be included in a Public Disclosure.

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

- Any material inadequacies in Jeevan's internal controls or disclosure controls.
- Any fraud, whether or not material, involving management or other employees who have a significant role in Jeevan's internal controls.
- Any attempt to mislead, coerce, manipulate or exert improper or fraudulent influence over the auditor of Jeevan's financial statements for the purpose of rendering those financial statements materially misleading.

Any Jeevan employee that knowingly causes a Disclosure Deficiency will be deemed to be in violation of this Code. Jeevan's employees are each responsible for implementing this policy by maintaining accurate records and reporting Disclosure Deficiencies, as required above.

To the extent not already reported, employees with knowledge of any lawsuits, governmental investigations, material demand letters, claims, complaints, investigations or other potential material legal, regulatory or loss contingencies pending or asserted against Jeevan must report such information to the Human Resources.

In order to ensure proper financial reporting, all Jeevan sales contracts must be executed by an authorized official of the customer on or prior to the final day of the applicable quarter. All sales contracts or related documentation must contain the full and complete agreement between Jeevan and the customer. Side-letters, verbal commitments or agreements, and kickbacks with customers or potential customers are prohibited.

3.9 ACCURACY OF RECORDS:

Although not all Jeevan employees are responsible for maintaining accounting records, many employees help keep or contribute to Jeevan's business records. Records relating to Jeevan business transactions and other activities must be prepared accurately and truthfully. Such records may not be removed or destroyed except in accordance with Jeevan's Information Retention Policy. Employees must also maintain accurate records of expenditures of corporate funds for travel and other reimbursable expenses, and accurate records demonstrating their eligibility for benefits including sick leave, disability payments and education. Falsification of business or employee records is prohibited. Jeevan may maintain no funds or assets for any illegal or improper purposes.

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

Complete and accurate records or information must be made available to Internal Audit and to Jeevan's independent auditors as requested.

All Jeevan payments and other transactions must be properly authorized and be accurately and completely recorded. No false, incomplete or misleading entries or records shall be created. No undisclosed or unrecorded corporate funds or accounts shall be established for any purpose.

3.10 FRAUD, MISAPPROPRIATION, THEFT, EMBEZZLEMENT AND BRIBERY:

Employees shall not commit, aid or assist in any fraud, misappropriation, theft, embezzlement, bribery or any similar activities. Employees who suspect or have information concerning any such wrongdoing involving Jeevan, its employees, any Jeevan agent or customer (including customer employees), or anyone doing business with Jeevan, must promptly notify his/her supervisor, the Compliance Officer or Human Resources. Prohibited acts include, but are not limited to:

- Forgery or alteration of checks, securities or other negotiable instruments;
- Misappropriation of funds, securities or any other assets;
- Improper handling or reporting of money or financial transactions;
- Improper handling of corporate property, assets or information, or their use for personal gain;
- Unauthorized disclosure of corporate business plans, intellectual property, trade secrets or financial information;
- Destruction or unauthorized removal of records, furniture, fixtures or equipment;
- Fraud for the financial benefit of the, including sales misrepresentation;
- Offering, making, soliciting or receiving any bribe, kickback or other unlawful payment, directly or indirectly;
- Providing untruthful information to customers regarding prices, capabilities and schedules;
- Violating federal, state or foreign tax laws; and
- Submitting false expense reimbursement reports

In addition, employees must not misuse or misappropriate Jeevan property or abuse the services or benefits programs available to them. Jeevan assets must be used only for proper business purposes and may not be used for personal gain or to benefit persons or entities other than Jeevan.

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

Employees are expected to use Jeevan equipment and materials (e.g. telephones, facsimile machines, computers, software, e-mail, photocopiers and office supplies) solely for corporate business. Equipment may not be removed from Jeevan's premises without the prior approval of your supervisor/manager.

3.11 INSIDER TRADING LAWS

Indian law prohibits any Jeevan employee from buying or selling, either directly or through an intermediary, Jeevan stock (or options on such stock) if the employee is aware of information relating to Jeevan that is both material and non-public (these terms are defined below). The law also prohibits "tipping" any other person as to the existence of such material, non-public information. Violations can lead to substantial fines, penalties, damage awards and imprisonment, and to equally severe penalties for Jeevan.

If employees have an unfair informational advantage when buying or selling stock, such conduct is considered securities fraud. The SEBI, the primary federal securities regulator, enforces the insider trading laws aggressively, and has fined and imprisoned many corporate employees, as well as persons ("tippees") who receive information tips from those employees.

If you have any doubt as to your responsibilities under these laws, before you act seek guidance from Jeevan's Human Resources Department, who will consult with the Office of the Managing Director as needed. Do not try to resolve uncertainties on your own.

A. Material Information Relating To Jeevan:

This is information regarding Jeevan that an investor would likely consider important in deciding whether to buy, sell or hold Jeevan securities. The information may be positive or negative. Examples include but are not limited to:

- Acquisition or merger proposals
- Tender offers
- Internal financial information which departs in any way from what the market would expect, including changes in earnings information
- Earnings, estimates or dividends
- Major contracts
- Major litigation
- Changes in senior management

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

- Growth and development plans
- Research discoveries

B. Non-Public Information:

This is information regarding Jeevan that has not yet been available to the public for at least one full trading day. Information is typically made available to the public through a press release or the filing of a report with the SEBI.

C. Material Non-Public Information Of Other Companies:

Insider trading laws also apply to the receipt of material, non-public information concerning other organizations. If you receive material, non-public information about a Jeevan customer, supplier, acquisition candidate or any other party, you should neither disclose that information to anyone else nor trade in that organization's securities until that information is released to the public. You should not trade in another company's securities if you believe Jeevan's plans or activities will affect its value.

D. Special Policies For Jeevan Officers:

Insider trading laws apply to all Jeevan employees, including all officers. Jeevan's officers, however, have even greater obligations and exposure under the insider trading laws because of their frequent access to material, non-public information regarding Jeevan. These personnel are therefore subject to a previously supplied memorandum directed to officers in addition to this Code.

3.12 DISCLOSURE OF MATERIAL NON-PUBLIC INFORMATION:

Jeevan's policy is to endeavor to promptly and publicly disclose material information. Jeevan endeavors to make such disclosures in an orderly and fair manner, in compliance with all applicable securities laws and regulations, and in accordance with applicable rules of the Stock Market. Jeevan has established controls and procedures to help ensure that disclosure of information to the public, whether verbally, by press release, through our website or otherwise, is accurate and timely. Public disclosures may be made only in accordance with these controls and procedures. Information regarding Jeevan is the property of Jeevan. Except as otherwise permitted by our controls and procedures, no employee shall disclose material non-public information

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

about Jeevan to any person except as required for internal Company business on a confidential basis.

In furtherance of this policy, the following requirements apply:

A. Investor Relations:

Refer all requests for information regarding Jeevan from shareholders, their representatives, or any member of the investment or financial communities, including your personal financial adviser, to Jeevan's Communications and Investor Relations Department. Do not handle these requests yourself.

B. Media Relations:

Employees may not release information about Jeevan or other Jeevan employees to the news media. Solely Jeevan's authorized management must release all such information.

All requests from the news media for information should be referred to the Managing Director. Do not handle these requests yourself.

Employees may not make public appearances, speeches or statements, in person or through broadcast, electronic or printed media, or the Internet relating to Jeevan or its business, without first disclosing the content and obtaining prior written approval from the Managing Director.

C. Prohibition On Tipping:

In addition to prohibiting your own trading in Jeevan securities while in possession of material, non-public information, the law also bars you from giving such information to others, except in the performance of regular corporate duties, such as necessary disclosures to fellow employees and to Jeevan's attorneys, accountants and other confidential advisers. If you breach this duty, you as well as your "tippee" are subject to the full range of legal penalties, if your tippee trades in Jeevan securities while possessing the information – even if you do not trade yourself.

3.13 ANTITRUST LAWS

Jeevan complies with central and state antitrust laws and the antitrust laws of the countries in which it does business. Antitrust laws seek to promote unrestrained competition. Violations can result in severe criminal penalties for Jeevan, and fines

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

and imprisonment for offending employees. Liability in civil suits can result in payment of treble damage awards and exclusion from entire areas of business activity. The following material only summarizes common problem areas. Review it carefully. If you have a concern regarding the legality of any activity – even seemingly unimportant activity – promptly contact the Managing Director before engaging in that activity. As needed, the Managing Director will consult with the Board of Directors.

A. Relationship With Competitors:

It is illegal to reach any agreement or understanding – express or implied, written or oral – with a competitor regarding price, terms of sales (e.g. discounts), production levels, division of markets, territories or customers, refusal to deal with third parties, or level of product quality. The law makes these activities automatically illegal. There is no need to prove an anti-competitive effect – this is presumed.

Remember, no formal agreement need be proved. A general, informal discussion with a competitor followed by common action often is enough to show an implied agreement, which can be a violation. Accordingly, employees should never discuss any of the following topics with competitors:

- Price or any aspect whatsoever of pricing policy
- Billing and credit practices
- Profits and profit margins
- Suppliers' terms and conditions
- Distribution or marketing plans or practices
- Bidding plans or practices
- Dividing up customers, products, sales territories or business markets
- Making false comments about a competitor's products and making false or misleading advertising claims
- New products
- Refusals to deal with customers or suppliers

If a competitor begins to discuss any of these subjects, terminate the conversation immediately, and report it to the Compliance Officer, who will consult with the Office of the General Counsel, as needed.

B. Customer Relations:

Certain types of contractual relationships with customers can also raise antitrust

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

concerns by unreasonably hampering competition. Typically, these arrangements are not automatically illegal, but require a showing of harm to competition. If you have reason to believe that a business arrangement that you are thinking of entering on Jeevan's behalf would be viewed as an unreasonable restraint on competition, do not act without the prior review and approval of the Compliance Officer. As needed, the Compliance Officer will consult with the Office of the General Counsel.

3.14 PROPRIETARY INFORMATION:

All employees must maintain the confidentiality of the company's trade secrets, business information and information relating to the company's vendors, suppliers, and customers. Employees must not use any such confidential or proprietary information except where appropriate for the company's business. Employees must not seek improperly to obtain or to misuse confidential information of the company's competitors. At the time of joining in the company all employees should sign 'Employee Confidentiality Agreement'.

A. Jeevan's Proprietary Information:

Proprietary information means any nonpublic business, technological, financial or personnel information, plans or data that you have learned, generated, had access to or acquired while working at Jeevan. Proprietary information may be oral or written. Jeevan's proprietary information is a valuable corporate asset. Employees may not access or use such information unless they have proper authorization and the information is relevant to the performance of their jobs. The content of all Jeevan files, records, strategies and other information is strictly confidential. Employees may not disclose such information to any outside parties without management's prior authorization. If management permits disclosure, it shall first determine whether to require the outside party to sign a confidentiality agreement.

Proprietary information includes Jeevan's trade secrets. A trade secret is any information or knowledge that has not been made public and which could give Jeevan a competitive advantage. Examples include, but are not limited to, customer lists, confidential computer technology and programs, patents, trademarks and copyrights. The general rule is: If you think it is possible that an item of information is proprietary, treat it as such. Should a breach of confidentiality occur for any reason, it is the obligation of the employee who becomes aware of the breach to notify his or her supervisor as soon as possible.

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

Follow these procedures for storing proprietary information:

- Label it "Proprietary and Confidential."
- Store it so that persons who are not supposed to have it do not have access to it.
- Give it to other Jeevan employees only if they need it to carry out their business responsibilities.
- If someone other than a Jeevan employee asks for such information, refer the request to the Compliance Officer or the Office of the General Counsel.

Each employee has a continuing obligation after separating from Jeevan for any reason not to make use of disclose any Jeevan proprietary or confidential information.

B. Proprietary Information of Other Companies:

It is Jeevan's policy to respect the proprietary information of other companies. An employee shall not solicit, receive or use another person's or entity's proprietary or confidential information without express consent.

If information comes into your possession which you think may have been misappropriated from another company or party, including trade secrets and material covered by a copyright, trademark or patent held by the other company or party, alert your supervisor/manager immediately and do not disclose the information to anyone else.

Unauthorized use of other companies' proprietary information by Jeevan employees can lead to civil and criminal liability for unfair competition, receipt of stolen property and related offenses by both Jeevan and the offending employee.

3.15 TRANSACTIONS WITH GOVERNMENT

It is Jeevan's policy to comply with all government laws, regulations and contract provisions.

Data submitted to a governmental agency must be truthful and accurate.

Deviation from any contract specifications, without prior written government authorization, is prohibited. Classified information may not be solicited or possessed without government authorization.

Employees must understand and abide by regulations prohibiting them from giving to or receiving from government personnel, directly or indirectly, any entertainment,

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

gifts, gratuities or other business courtesies that might be acceptable in the private sector.

All employees whose jobs involve business with the government must know and follow the rules applicable to their jobs. If in doubt, the employee is to discuss the matter with his or her supervisor.

3.16 DOMESTIC / FOREIGN MARKETING PRACTICES

Jeevan prohibits its employees from making, or offering to make, payments of money, products or services to any domestic / foreign governmental official or governmental employee, to any foreign political party, or to any official or candidate of a foreign political party if the purpose of the payment is to help Jeevan obtain or retain business, or to help Jeevan direct business to any person. Jeevan also bars the making or offering of such payments through third-party intermediaries.

If you have any concern that a payment that you are thinking of making, offering or authorizing will violate the Jeevan's policy, do not act without the prior review and approval of the Managing Director. If you violate the policy, you are subject to severe civil and criminal penalties.

In countries outside the India, Jeevan employees must obey Indian and foreign laws relating to gifts and entertainment for public employees, and may not engage in any illegal activity to obtain or retain business.

Jeevan will observe the laws of foreign countries in which it operates.

3.17 USE OF COMPANY RESOURCES:

Jeevan provides necessary tools for employees to complete their job. Employees should take all possible care when using company property, goods, intellectual property and services and ensure they are used efficiently, carefully and honestly.

Use of Communications and Electronic Equipment, Software, and Data:

All of Jeevan's electronic information systems are the property of the Company. "Information Systems" includes, but is not limited to, computer hardware, software, communications equipment and all communications and information transmitted thereby, including the Internet, electronic mail and voice mail. Jeevan's Information Systems are to be used for business-related purposes. While employees may engage

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

in some minimal personal use which does not violate this Code, affect or interfere with the employee's performance of his or her job, compromise the Company's business interests, result in added costs to the Company, or otherwise impair operations of the Company's Information Systems in any way, employees are to use Information Systems to transmit or obtain business information.

A. Internet, Electronic Mail and Voice Mail Use Policy:

Jeevan provides Internet, electronic mail (e-mail) systems to help employees do their jobs and communicate business issues with one another as effectively as possible. As helpful as these systems are, whenever possible, person-to-person dialog is always preferred over e-mail. As with other forms of business communication at Jeevan, e-mail should always be professional in content and format. Accessing web sites that are obscene or offensive is strictly prohibited.

B. No Expectation of Privacy:

Jeevan treats all messages, transmissions, or information sent, received, or stored over the Internet or through the e-mail system as business information. Employees should understand that they have NO expectation of privacy in connection with the access and use of Jeevan's Information Systems. To safeguard and protect Jeevan's proprietary, confidential, and business-sensitive information, and to ensure that the use of the Company's Information Systems is consistent with the Company's legitimate business interests, these systems are monitored. Jeevan reserves the right to retrieve and review any message or information composed, sent, or received. Should employees make incidental use of the e-mail system to transmit personal messages, such messages will be treated no differently from other messages in that the Company reserves the right to access, review, copy, delete or disclose them for any purpose.

C. Other Prohibited Uses:

Use of Jeevan's Information Systems to copy and/or transmit any documents, software, or other information protected by the copyright laws is prohibited. In addition, employees shall not use the Company's Information Systems to engage in any communications that are in violation of Company policy or applicable laws, including but not limited to obtaining, viewing, transmitting or posting defamatory, discriminatory, obscene, offensive or harassing information, material, or messages or disclosing personal information without authorization. Anyone who violates this policy may be disciplined, up to and including termination.

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

All Jeevan employees must abide by the Acceptable Use Policy, which is incorporated into this Code by reference.

3.18 ENVIRONMENT, HEALTH AND SAFETY:

Jeevan is proud of having always provided a safe, healthy and productive work environment for its employees, clients and vendors. The professionalism and cooperation of Jeevan employees have greatly contributed to this achievement. Consequently, Jeevan and its employees shall abide by all applicable environmental, health and safety laws. If you have any questions or concerns regarding compliance with these laws, please contact your supervisor/manager or Human Resources.

3.19 EXPORT CONTROL LAWS:

A number of countries maintain controls on the destinations to which products or software may be exported. Some of the strictest export controls are maintained by the India against countries that the India considers unfriendly or as supporting international terrorism. The Indian regulations are complex and apply both to exports from the India and to exports of products from other countries, when those products contain Indian origin components or technology.. In some circumstances, an oral presentation containing technical data made to foreign nationals in the India may constitute a controlled export. The Human Resources can provide you with guidance on which countries are prohibited destinations for Jeevan products or whether a proposed technical presentation to foreign nationals may require a Indian license.

3.20 PREVENTION OF VIOLENCE IN THE WORKPLACE:

The best deterrent to employee violence is open communication between an employee and his/her management. Jeevan recognizes this and will, as we always have, maintain an open door policy for constructive and interactive problem resolution. However, any act of violence or threat of violence, serious or not, direct or indirect, against a co-worker, client, visitor or other individual by a Jeevan employee will not be tolerated and is expressly prohibited. Any employee found to be engaging in such act would be subject to disciplinary action, up to and including termination. In

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

addition, possession of weapons in the workplace, whether it be a Jeevan facility or at a client site, is strictly prohibited regardless of any state or federal law allowing the carrying of concealed weapons.

In addition, it is every employee's obligation to immediately report to his/her manager and to Human Resources any such act or threat of violence made by a Jeevan co-worker, client, visitor or other individual that may affect the safety or security of the workplace. Failure to do so may result in disciplinary action, up to and including termination. Jeevan will make every reasonable effort to maintain confidentiality of any reported act or threat of violence. The prevention of potential serious harm to any individual, however, will take precedence over confidentiality.

3.21 INSPECTION/PRIVACY:

Every employee may be required, upon the Company's request, to submit to a search of any pocket, package, purse, briefcase, lunch bag, container, or other personal property brought onto Company premises, and to submit to a search of a desk, cabinet or other stationary or documents provided by the Company, and the employee should not harbor any privacy expectation for these items. Likewise, employees should not have an expectation of privacy for these items on the premises of Jeevan customers, clients and vendors. Any items that you do not want to have inspected should not be brought to the workplace.

3.22 ALCOHOL AND DRUG FREE ENVIRONMENT:

In keeping with Jeevan's commitment to provide a healthy, safe and productive work environment, Jeevan maintains an alcohol and drug free work environment. Employees are prohibited from engaging in the unlawful manufacture, distribution, possession, use, or being under the influence of a controlled substance, illegal drugs and/or alcohol during working hours (including breaks and overtime) and/or on company, customer or vendor premises, whether working or not (including parking lots and adjacent company property).

Prior to being extended an offer of employment, all job applicants may be required to successfully pass a drug screen for the presence of illegal drugs and controlled substances beyond any physician-prescribed amounts. Applicants who refuse to submit to, or who do not pass, the drug screen will not be considered for employment at that time, but may reapply after one year.

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

Current employees will continue to be required to submit to drug screening when our clients lawfully request such screening. In addition, employees may be required to submit to screening based upon reasonable suspicion of intoxication, impairment and/or drug use. The basis of reasonable suspicion usually includes, but is not limited to, incoherent behavior and/or a sudden change in work performance or conduct. All cases of reasonable suspicion must first be reviewed with the Human Resources before any action is taken.

Jeevan reserves the right to send an employee for assessment and/or evaluative testing. Upon completion of an assessment, if the employee is diagnosed by a physician as a alcohol/drug dependent, the employee, if eligible, may receive absence pay.

Any violation of this policy may result in disciplinary action, up to and including immediate termination.

3.23 RELATIONSHIP WITH CUSTOMERS, VENDORS, COMPETITORS AND ASSOCIATES:

Jeevan employees who deal with vendors must be governed by sound judgment and absolute integrity and ensure that vendors comply with applicable regulatory requirements. Jeevan employees must not pass on information concerning a vendor's problems or shortcomings to any other vendor or other person outside Jeevan.

Jeevan employees must ensure the external consultants commission and consulting contracts are always in writing and payment made to consultants are lawful.

Jeevan employees must not talk with competitors about internal matters, such as pricing, costs, overviews of the market, organizational processes, or other confidential information, from which competitors could draw competitive advantage over Jeevan.

Jeevan has a legitimate interest in obtaining information about competitors and evaluating all published information about its competing companies (for example, publications about services and pricing). Jeevan employees must not seek to obtain trade secrets or other confidential or secret information about a competitor using dishonest means.

Employees must conduct themselves with absolute loyalty towards Jeevan.

3.24 SECURITY:

It is recommended that employee shall not bring costly items, valuables to the work

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

place. It is employee responsibility to take care of their personal belongings. Company has the right to inspect all items/ parcels that enter and leave the company premises and also perform the sudden security checks on any single individual or collectively to ensure no unauthorized data or materials of company are carried out. Employees are expected to cooperate such surprise security checks.

3.25 MISCONDUCT:

The following are considered acts of misconduct and disciplinary action will be taken if employee indulge in any of the following,

- 1) Conduct endangering the lives, health and safety of anyone, including but not limited to any kinds of harassment.
- 2) Negligence of work
- 3) Logging attendance of any other workman / employee or to falsify the records in any manner in respect of attendance or Payment of Wages
- 4) Falsifying and tampering with any official records
- 5) Unauthorized private activities during working hours without permission
- 6) Unauthorized use of company property/ equipment/resources (like Telephone/Fax, Internet etc.) for personal work
- 7) Unacceptable standards of interpersonal behavior to other employees or members of the public
- 8) Willfully allowing any unauthorized person to enter the company premises outside the working hours
- 9) Willful damage to company property
- 10) Allowing an unauthorized person to operate his machine
- 11) Off-duty conduct that adversely impacts on the job
- 12) Being in the possession of illegal drugs in the workplace
- 13) Unauthorized possession of any firearm or dangerous weapon
- 14) Failing to devote appropriate time and attention to duties
- 15) Engaging in private work or trade within the premises of the company.
- 16) Money lending or borrowing or running a chit funds scheme or engaging any kind of such trade within the premises of the company.
- 17) Dishonesty including, but not limited to, theft; fraud or misappropriation of company's funds ; unauthorized possession of property; falsification of documents including, but not limited to employment applications and business

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

- records; accepting secret commissions or unauthorized payments
- 18) Unauthorized disclosure, to any person, of any information with regard to the process of the company
 - 19) Concerted activity contrary to any contract or the law, such as unprotected coercive industrial action of any kind, including, but not limited to, striking, picketing, demonstrating, boycotting or protesting.
 - 20) Conduct that is obscene, immoral or offensive, including but not limited to sexual harassment and the use of racist or foul language or rudeness to anyone, including fellow employees, clients, suppliers and other persons having any dealings with the employer.
 - 21) Obscene or indecent behaviour or sexual misconduct or the circulation of offensive material.
 - 22) Misbehavior towards customers and visitors.
 - 23) Committing nuisance at/within premises of the company
 - 24) Drunkenness or conduct which violates common decency and morality.
 - 25) Assaulting, abusing, threatening or intimidating any superior or any other workman / employee of the company, whether inside or outside the company in connection with the work / business of the company.
 - 26) Playing cards and gambling within the premises.
 - 27) Smoking and / or spitting within the premises of the company other than at the place where permitted.
 - 28) Holding meeting or shouting slogans or demonstrations inside the premises of the company or distributing or accepting inside the premises hand bills, notices or pasting posters, abusing any superiors in the company.
 - 29) Failure to furnish the management with the certificate of fitness.
 - 30) Noncompliance with the company policies from time to time.
 - 31) Any act which may be considered as misconduct in common parlance

The above list is not exhaustive.

3.26 DISCLAIMER:

This code of conduct is not intended to and does not create any rights to any employee, customer, supplier, competitor, shareholder or any other person or entity.

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

4.0 Definitions/Abbreviations:

CoC: Code of Conduct
SEBI: Securities Exchange Board of India

5.0 Appendices:

Appendix 01: Acknowledgement Form

6.0 Amendment History:

Revised the 'Employee Hand Book', Effective Date 15 Mar 2011 with following changes and updated in this Code of Conduct (CoC),

- Changed the title to Code of Conduct
- New policy template used for this CoC
- 'Acknowledgement' moved from first page to last page as appendix 01
- About the Company Section removed from Employee Hand Book.
- Confidentiality Information added in section 3.14
- Use of Company Resources paragraph added in Sec 3.17
- Sec 3.23, 3.24 and 3.25 added in this CoC
- Leave Policy, Attendance Policy, Job Abandonment section removed from Employee Hand Book

Gopi K Kilaru, Managing Director

Signature on File

Approved By (Name, Job Title)

Signature

Date

Policy	Jeevan Scientific Technology Limited Clinical Research Services	
---------------	---	---

Title: Code of Conduct		
Department: Human Resources	Policy No.: PHR-01, Ver. 02	Effective Date: 02 Jul 2014

ACKNOWLEDGEMENT FORM:

I have received the Jeevan Scientific Technology Limited (Jeevan) Code of Conduct (CoC) for use by employees of Jeevan and acknowledge my obligation to read its contents. I understand that the CoC is intended to provide an overview of Jeevan’s policies and procedures and does not necessarily represent all such policies and procedures in force. I further understand that Jeevan reserves all legal rights to add, change, abrogate, or rescind from time to time any policy, plan, term, or practice, including employee remuneration and perquisites, and benefit plans, at its sole discretion, at any time during the course of my employment, with or without notice. I further understand and acknowledge that:

- 1) SUPERSEDE ANY AND ALL CONTRARY TERMS AND CONDITIONS OF EMPLOYMENT THAT MAY HAVE BEEN IN EXISTENCE PRIOR TO THE EXECUTION OF THE POLICIES IN THIS CODE OF CONDUCT;
- 2) CAN BE MODIFIED ONLY BY WRITTEN AGREEMENT BETWEEN THE EMPLOYEE AND THE MANAGING DIRECTOR.
- 3) ARE MUTUALLY EXCLUSIVE OF ALL OTHER POLICIES, PROCEDURES, BENEFITS, AND OTHER TERMS AND CONDITIONS OF EMPLOYMENT, WHICH JEEVAN RETAINS THE RIGHT TO MODIFY AT ANY TIME WITHOUT NOTICE.

I acknowledge that I have read and agreed to comply with this Code of Conduct and offer letter. The signed original copy of this document will remain in my personal file.

I agree that it is my responsibility to contact Human Resources/Authorized Official in-charge if I do not understand, or have any questions about this Code of Conduct.

Employee’s Legal Name
(Typed or clearly printed) : _____

Employee’s Signature : _____

Place : _____

Date : _____