

Declaration – Code of Conduct

This is to confirm that the Board has laid down a code of conduct for all Directors and Senior management personnel of the Company. It is further confirmed that all Directors and Senior Management personnel of the Company have affirmed compliance with the code of conduct of the Company for the financial year ended on 31st March 2009, as envisaged in Clause 49 of the Listing Agreement with Stock Exchanges.

For Inwinex Pharmaceuticals Limited

Sd/-

Ramesh Chandra Agarwal

Managing Director

Date: 27.11.2009