

BRADLEY PHARMACEUTICALS, INC.

CODE OF BUSINESS CONDUCT AND ETHICS

MESSAGE FROM THE CHAIRMAN AND CHIEF EXECUTIVE OFFICER

To our Officers, Directors and Employees,

Bradley Pharmaceuticals is committed to delivering excellence in all its endeavors, including standards for business conduct. Bradley places great importance on certain core values that guide our business, such as honesty, integrity and ethical behavior. These core values should govern all interaction with our customers, suppliers, employees and stockholders.

This Code of Business Conduct and Ethics expresses the standards of business conduct and integrity expected of all Bradley officers, directors and employees. While it is not a substitute for an individual's common sense and good judgment, this Code is a guide to help each of us resolve ethical issues in an increasingly complex global business environment.

This Code is also a public statement of Bradley's commitment to the highest standards of honesty, integrity and ethical behavior. While business practices may change over time, our commitment to these core values will remain constant. These core values have been essential to our past success and remain crucial to our future.

You are urged to read this Code carefully and to abide by the spirit as well as the letter of this Code. When you act on Bradley's behalf, please keep in mind that Bradley's reputation depends on you.

Daniel Glassman
Chairman and Chief Executive Officer

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I. COMPLIANCE AT BRADLEY

A. Standards

As an officer, director or employee of Bradley Pharmaceuticals, Inc. (the “Company,” “Bradley,” “we,” “us” or “our”), you are responsible for representing Bradley. Each time you act on behalf of Bradley, you represent the values and principles of Bradley. While proper conduct may be second nature, there are many situations where making the “right choice,” both legally and ethically, is challenging.

This Code of Business Conduct and Ethics (the “Code”) is a guide to Bradley’s compliance structure and Company policies and procedures that govern doing business in a legal and ethical manner. This Code also summarizes various laws and regulations facing Bradley and its officers, directors and employees. While this Code does not describe all of the applicable laws, regulations, and Company policies and procedures, this Code does explain those laws, regulations and Company policies and procedures that are most likely encountered in Bradley’s day to day business.

Compliance is a shared responsibility between the Company and its officers, directors and employees. The Company is responsible for defining how Bradley will comply with applicable laws and regulations through systems, policies, and procedures, monitoring these efforts and correcting any non-compliance. The officers, directors and employees of Bradley are responsible for understanding and following the standards described in this Code, and for seeking guidance when needed.

We encourage you to discuss any questions or concerns with your supervisor or to request advice from the Vice President of Human Resources, our human resources manager (the “Human Resources Manager”).

B. Procedures

All officers, directors and employees of Bradley are expected to work together to ensure prompt and consistent action against violations of this Code. However, it is often difficult to discern if a violation has or may occur. Since Bradley cannot anticipate every situation that may arise, it is important that we have a systematic approach to each new question or problem. Below are the steps to Bradley’s compliance procedures when faced with a questionable situation:

1. *Make sure you have all the facts.* To make an informed decision, you must understand the situation. Furthermore, if called upon, Bradley must also be provided with all available facts in order to reach the right solution.
2. *Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper?* Answering these questions will enable you to focus on the specific question you are faced with, and the alternatives available to you. Furthermore, use your common sense. If something seems unethical or improper, it probably is.

3. *Clarify your responsibility and role.* In most situations, there is shared responsibility. Make sure your colleagues are informed. It often helps to get others involved, or at least discuss the problem.
4. *Discuss the problem with your supervisor.* This is the basic guidance for all situations. In most situations, your supervisor will be more knowledgeable about the question, and will appreciate being brought into the decision-making process. Remember, it is your supervisor's responsibility to help solve problems.
5. *Seek help from Company resources.* In the rare case where it may not be appropriate to discuss an issue with your supervisor, or where you do not feel comfortable approaching your supervisor with your question, discuss it with Bradley's Human Resources Manager.
6. *Always ask first, act later.* If you are unsure of what to do in any situation, seek guidance before you act.

Bradley encourages all officers, directors and employees to report any violations, or possible violations, of laws, regulations or Company policies and procedures. With respect to questionable accounting or auditing matters, Bradley's Audit Committee has established a hotline for the confidential submission of concerns regarding these matters. Please call (877) 696-6223 to voice any concerns regarding questionable accounting or auditing matters.

C. Confidentiality

Employees have a right, and at times a legal obligation, to call the Company's attention to situations in which the law or this Code have or may be breached. Employees may contact their supervisor or the Human Resources Manager anonymously. Those who choose to identify themselves are assured that they will not suffer disciplinary or retaliatory action. Confidentiality will be maintained to the extent possible in light of the Company's duty to fully investigate any report of improper conduct.

D. Open Door Policy

The foundation of Bradley's compliance effort is accessibility within the Company. Most issues can be resolved before they become a problem for the Company, its officers, directors or employees. All officers, directors and employees are encouraged to present Bradley with ideas, concerns, and questions relating to this Code, especially those of a legal or ethical nature. All officers, directors and employees are responsible for supporting this policy by maintaining an "open door" for anyone who may reach out to them.

E. Requests for Waivers

While some standards in this Code require strict application (and exceptions or waivers are not allowed), others do allow for waivers. For example, minor conflicts of interest might be resolved by disclosing the conflict to all interested parties. Any waiver of this Code for directors and officers can be made only by the Board of Directors (the "Board") or a Board

Committee given that authority and must be promptly disclosed to stockholders of the Company. Employees who are not officers or directors and believe they merit a waiver, should first contact their supervisor. If the supervisor agrees that a waiver is warranted, the supervisor may forward a request for a waiver to the Board of Directors.

F. Other Requirements

While this Code is extensive, it is by no means exhaustive. Nothing expressed or implied in this Code can represent all the policies and procedures the Company believes its officers, directors and employees should follow. Further, this Code does not provide a full, comprehensive or complete explanation of all laws and regulations relevant to the Company and all of its officers, directors and employees.

All officers, directors and employees of Bradley have a continuing obligation to familiarize themselves with all applicable laws and Company policies and procedures relevant to their individual responsibilities. Bradley's corporate governance policies and procedures are also available on our website, www.bradpharm.com. As an officer, director or employee of Bradley, you are expected to understand how these policies and procedures apply to you and to follow them.

II. THE MARKETPLACE

A. Antitrust and Competition Laws

Antitrust and competition laws protect free enterprise. While these laws are complex and difficult to summarize, at a minimum they prohibit agreements between Bradley and our competitors that affect prices, terms or conditions of sale, or fair competition. Generally, under antitrust and competition laws, competitors cannot agree on:

1. Discounts for products;
2. Terms and conditions of sale of their products;
3. Prices to charge for their products or margins;
4. Advertising or promotion of their products;
5. Territories in which to sell products;
6. Customers to whom products are sold;
7. Product types, product lines or amounts that companies can produce or sell; or
8. Matters related to competitive bids.

It is Bradley's policy that no officer, director or employee discuss these matters with competitors or participate in, or attend, any meeting where these matters are discussed by competitors. As an officer, director or employee of Bradley, if you are responsible for areas of

the business where these laws apply, you must be aware of them and their implications. Actions that might violate applicable antitrust or competition laws can take many forms. Beware of discussions or agreements with competitors that relate to prices; terms or conditions of sale; costs, profits, or profit margins; product or service offerings; production or sales capacity or volume; market share; coordination of bidding activities; or dividing sales territories or allocation of customers or product lines.

B. Bribery and Corruption

Bradley forbids payments of any kind to any person either to obtain advantage in selling goods and services or to advance our interests with government authorities. Any such payment violates Bradley's policies and procedures.

C. The Anti-Kickback Law

In the United States, there is a special healthcare law, the "Anti-kickback Law," that prohibits the offering of anything to a person that is intended to influence that person to recommend or purchase a healthcare product (including a prescription medication) or service that may be reimbursed by Medicare or Medicaid. This is to ensure that a healthcare provider's decision about a choice of treatment or product for his or her patient not be influenced by motives of personal gain or enrichment.

D. Gifts and Entertainment

It is Bradley's policy that its officers, directors and employees should not seek, accept or provide, directly or indirectly, gifts, entertainment or other favors of a type or amount that goes beyond common courtesies consistent with ethical business practices. Bradley expects its officers, directors, employees and agents to avoid even the appearance of a conflict of interest. Accordingly, cash payments are strictly prohibited.

As a general rule, you can accept a gift, including entertainment, from non-governmental customers, suppliers or business partners if it is unsolicited, inexpensive and not given to influence your judgment. Otherwise, you should decline the gift and explain Bradley's policy to the gift-giver. If there is any question about a gift, you should consult your supervisor.

You may provide reasonable entertainment and meals to non-governmental customers, suppliers or other business partners, provided that the entertainment is related to a proper business purpose, that the entertainment is not being offered to influence the recipient's business decision, and that such entertainment is permitted under applicable laws, regulations, and rules.

It is Bradley's policy that officers, directors, employees and agents of Bradley should never provide government officials with gifts, entertainment or meals, or cover travel-related expenses of such officials, without satisfying all applicable Company policies and procedures for such payments. Consistent with applicable laws and Company policy, improper payments or gifts provided to government officials in order to obtain or retain business for Bradley are strictly prohibited.

E. Truthful and Accurate Marketing

It is Bradley's policy not to misrepresent our products or capabilities, even if it means losing a sale. Where silence may mislead a customer, it is our policy to disclose the information. Bradley is committed to communicating clearly and precisely so that our customers understand our products, our culture and our commitment to excellence.

To maintain our customers' trust, our advertisements and other communications must always accurately and fairly describe our products. Deceptive advertising would be a serious disservice to our customers and could hurt Bradley's good name. These principles also apply to discussions of competitors.

F. Competitive Information Gathering

Gathering information about competitors, when done properly, is a legitimate business activity. It enhances our knowledge of the marketplaces in which we sell and helps us understand and meet customer needs. Competitive information, however, should not be obtained, directly or indirectly, by improper means, such as: misappropriating trade secrets or other confidential information; bribery; inducing someone to breach a nondisclosure agreement; making improper requests of a competitor or customer; using material from an unknown or questionable source; or by using deceit or trickery. Improperly collecting or using competitive information may subject Bradley and the individuals involved to lawsuits or criminal penalties, up to and including imprisonment. If we retain consultants to gather competitive information on our behalf, the same rules apply.

G. Healthcare Laws

As a pharmaceutical company, Bradley is part of a uniquely regulated industry. The purchaser of our products is not usually the individual or entity prescribing or using our products. The actual purchaser may be the government or an insurance company, while the decision-maker will be the doctor, the healthcare institution, a pharmacist, or even the patient. Because of this, our industry is subject to certain rules and regulations designed to protect the public. Bradley is committed to fully complying with the healthcare laws of the United States.

Generally, healthcare law compliance is designed to:

1. Reduce fraud and abuse in federal healthcare programs (Medicare and Medicaid);
2. Eliminate the improper influence of financial incentives on medical judgment;
3. Protect patients and improve the quality of healthcare services;
4. Reduce the cost of healthcare; and
5. Ensure the proper use of taxpayer money.

As an officer, director or employee of Bradley, you must comply with all laws relating to the conduct of business in the pharmaceutical industry.

H. Regulatory Requirements

Bradley also follows all applicable laws governing the manufacturing and distribution of pharmaceutical products, including the applicable requirements of the United States Food and Drug Administration (the "FDA"). While Bradley is subject to a number of FDA regulations, the FDA regulations concerning advertising and promotion of our products directly affect users of our products. All officers, directors and employees have an on-going obligation to understand the basic rules Bradley follows to ensure compliance with all FDA laws and regulations regarding labeling, promotion, off-label use, pharmaceutical samples, and adverse event reporting.

I. The Environment

Bradley is committed to protecting the environment and the health and safety of our officer, directors, employees, customers and the communities in which we operate. Meeting this obligation is an important management objective and the individual and collective responsibility of all the officers, directors and employees of Bradley.

III. PROMOTING AND PROTECTING BRADLEY'S INTERESTS

A. Conflicts of Interest

Bradley's policy on conflicts of interest requires all officers, directors and employees to avoid situations in which their personal interests might conflict, or appear to conflict, with the interests of Bradley. Conflicts of interest may arise in many types of situations, such as when an individual's personal or business interests are adverse to the interests of Bradley. The following information should serve as a guide to potential conflict of interest situations.

It is Bradley's policy that all officers, directors and employees do not:

1. Influence, either directly or indirectly, Bradley's dealings with any customer or supplier with whom you have a personal, familial or financial relationship;
2. Work for, represent or favor for personal reasons, a customer in its dealings with Bradley;
3. Enter into unauthorized business relationships with competitors. Accordingly, officers, directors and employees of Bradley may not own a competing business or assist any unauthorized person outside of the Company, including family or friends, in the planning, design, manufacture, sale or purchase, of products that compete or could compete with Bradley products;
4. Have a financial interest in privately-held suppliers or customers (or own more than a de minimis percentage of a public entity) with whom you conduct

(or can reasonably expect to conduct) business on behalf of Bradley (excluding transactions approved by Bradley's Board or Nominating and Corporate Governance Committee after disclosure to it of your financial interest); or

5. Use of Bradley's name, information, property, time or other resources to perform outside activities such as a second job or volunteer, political or community activities not specifically sponsored or approved by the Company.

As noted, conflicts of interest may arise in a variety of situations, some of which involve family members. It is our policy that Bradley's officers, directors and employees must avoid not only financial relationships or other situations between themselves and other businesses that could result in conflicts of interest, but also circumstances in which their immediate family members are involved in such financial relationships or situations. This does not mean that an officer, director or employee's family members are prohibited from being employed by one of Bradley's customers, competitors or suppliers. It does mean, however, that the officer, director or employee must refrain from transacting Bradley business with those customers, competitors and suppliers until he or she raises the issue and receives appropriate approvals, as detailed below.

Each situation should be reviewed by the Company and a determination made as to whether a conflict of interest exists or may arise from such a situation. Employees of Bradley should raise questions about potential conflicts of interest with their supervisor or the Human Resources Manager and officers and directors should raise these questions with the Board or the Nominating and Corporate Governance Committee. If circumstances change, either with respect to Bradley's or an officer, director or employee's outside interest, and such circumstances create a conflict of interest, the officer, director or employee may be required to cease the outside business interest or activity.

B. Corporate Opportunities

Bradley's officers, directors and employees are prohibited from taking for themselves opportunities that are discovered through the use of corporate property, information or position without the consent of the Board. No officer, director or employee may use Bradley's property, information or position for improper personal gain, and no officer, director or employee may compete with Bradley directly or indirectly. Officers, directors and employees owe a duty to Bradley to advance its legitimate interests when the opportunity to do so arises.

C. Books and Record Keeping

Accurate business records are essential to Bradley's business operations and to maintaining and safeguarding stockholder confidence. Accurate business records also help Bradley fulfill its obligation to provide full, fair, timely, and understandable financial and other disclosure to the government and the public. Therefore, Bradley's books, records, and accounts (whether computerized, paper, or otherwise) must accurately reflect our business transactions.

These include time sheets, vouchers, bills, invoices, expense reports, payroll and benefits records, performance evaluations, and other essential Company data.

Official records must be accurate, reliable, and reflect the Company's position on the activity, transaction, or decision it represents. All records, including records delivered via e-mail, should be created with the specific purpose of communicating or documenting business matters. Bradley's officers, directors and employees should use discretion when creating records and avoid language that is confusing or misleading. Records should not contain inflammatory or inappropriate language that may offend others. To protect Company records:

1. Prepare records accurately, in a timely manner, and in reasonable detail;
2. Where applicable, sign only records that are accurate and complete;
3. Retain records, whether hard copy or electronic, according to Bradley's records retention policies adopted from time to time; and
4. Disclose records only as authorized by applicable Company policy.

Official records should not be willfully altered, destroyed or falsified by any Bradley officer, director or employee. Furthermore, each officer, director and employees should avoid any negligent or inadvertent alteration or destruction of official records. Failure to follow these rules may result in civil liabilities or criminal penalties.

D. Document Retention

Bradley has records retention and disposal procedures to ensure that Company records are maintained, stored, and, when appropriate, destroyed in accordance with our needs and in compliance with applicable legal, regulatory, environmental, tax, employment, and trade requirements. Subject to certain legal requirements, you may keep active documents in a way that suits your daily business needs. Inactive documents must be stored in a reasonable manner intended to protect such documents from damage. Regular document destruction must stop immediately if you are aware of a legal request for such documents. Records must remain on Company premises or in other Company-approved locations. Records should be stored in a location appropriate to their status: "Active" vs. "Inactive." They must be identifiable and available for access by Bradley, auditors, or attorneys, as necessary.

E. Use of Company Property

Officers, directors and employees of Bradley should not use Bradley property or services for their own or another's personal benefit. The use of Bradley property is intended to benefit the Company. Sometimes the line between personal and Company benefits may be difficult to draw, since activities sometimes create both personal and Company benefits. In such cases, seek approval from your immediate supervisors when using Company property or services that do not solely benefit the Company.

F. Use of Company Computers and Networks

Internet and e-mail access and usage are provided to Bradley's officers, directors and employees in connection with Bradley's business operations. Like your computer, any software and other technology you have access to in order to perform your job, as well as messages sent and/or received on them, are Bradley's property. Non-business use of these resources must be governed by good judgment and restraint, and must be limited to non-work time. Management will limit non-business usage if it interferes with individual productivity or the overall availability of network and computing resources. If you are unsure whether your internet or e-mail usage is appropriate, you should discuss this matter with your supervisor.

The Company may monitor computer use by employees, including internet use and, in certain cases, e-mail use. Monitoring may be conducted for a variety of reasons, including the managing of the Company's computer network, assurance of system security and verification that employees are in compliance with Company policy. Certain types of uses of the Company's internet access and e-mail systems are forbidden at all times by the Company. They include the following:

1. Transmitting or downloading pornographic, sexually-oriented, racist, sexist or ethnically insensitive material or any material that is disparaging to others;
2. Conducting personal business activity;
3. Posting your opinion with regard to Company business in chat rooms, bulletin boards, news groups, etc., unless you are specifically authorized to do so; and
4. Sending e-mail chain letters or other similar mailings that use up significant computing resources.

Bradley's policy applies to all individuals who are authorized to use the Company's e-mail systems, internet access, databases, storage devices, computer hardware and software and voice mail, whether accessed at the office or via remote access. Violation of Company policy regarding the use of computer resources may result in restriction or termination of access to the Company's computing resources and other disciplinary action, up to and including termination of employment.

G. Confidential and Proprietary Information

The products, services, ideas, concepts, and other information Bradley produces are important proprietary assets for our Company. Various laws enable us to protect these assets. Examples of confidential or proprietary information include marketing plans, sales and marketing data, customer and employee records, financial results, research and technical data, manufacturing techniques, pricing information, strategies, and information pertaining to new products and services.

It is in Bradley's best interest to protect our confidential and proprietary information and to prevent inappropriate or unauthorized disclosures. Be careful when using the telephone, fax, telex, e-mail, and other electronic means of storing and sending information. Do

not discuss confidential information in public places where others may overhear. Never provide confidential information to outsiders without first getting the approval of your immediate supervisor and, if deemed necessary by the supervisor, receipt of an appropriate form of confidentiality agreement executed by the recipient.

H. Patents, Trademarks, and Copyrights

Protection of Bradley's intellectual property, including our patents, trade secrets, copyrights, trademarks, scientific and technical knowledge, know-how, and the experience developed in the course of the Company's activities, is essential to maintaining the Company's competitive advantage. As an officer, director or employee of Bradley, you are expected to establish, protect, maintain, and defend Bradley's rights in all commercially significant intellectual property and to use those rights in a responsible way.

In addition to protecting Bradley's intellectual property rights, you must respect the valid intellectual property rights of others. Unauthorized use of the intellectual property rights of others may expose the Company to civil lawsuits and damages. Theft and misappropriation of intellectual property may result in significant fines and criminal penalties for you and the Company.

I. Media and Public Inquiries

Bradley is committed to delivering accurate and reliable information to the media, financial analysts, stockholders, brokers, and other members of the public. All public disclosures, including forecasts, press releases, speeches, and other communications, are intended to be honest, accurate, timely, and representative of the facts. To ensure consistent, accurate delivery of Company information, employees are not authorized to answer questions from the news media, securities analysts, stockholders, or other members of the public. When approached for information, you must record the name of the person making the inquiry and immediately notify your superior.

J. Government Requests for Information or Facility Visits

Bradley cooperates with all government departments and agencies in any request for information or facility visits in connection with government investigations. Management will represent the Company in such situations and will determine what information is appropriate to supply to investigators. If you are contacted by any government agency, call your supervisor or the Human Resources Manager immediately for assistance.

K. Political Activity

Bradley permits political activity and participation in electoral politics by officers, directors and employees where appropriate. However, such activity must occur strictly in an individual and private capacity and not on behalf of the Company, except as approved by the Board. Officers, directors and employees may not conduct personal political activity on Company time or use Company property or equipment for this purpose.

IV. BRADLEY EMPLOYEES

A. Equal Opportunity and Discrimination

We believe our most important strength is our employees. Bradley seeks to provide a work environment where all officers, directors and employees have the opportunity to reach their full potential and contribute to Bradley's success.

Bradley is committed to equal opportunity in all aspects of employment for all officers, directors, employees and applicants; to providing a workplace free from all forms of discrimination, including sexual and other forms of harassment; and to fostering a work environment where people feel comfortable and respected, regardless of individual differences, talents or personal characteristics. Bradley encourages an inclusive environment that enables all officers, directors and employees to do their best. This means we:

1. Welcome and embrace the strengths of our differences;
2. Provide equal access to opportunities and information;
3. Treat each other with respect and dignity; and
4. Foster an atmosphere of caring, open communication and candor.

B. Health and Safety

Bradley strives to provide each officer, director and employee with a safe and healthy work environment. Each officer, director and employee has the responsibility for maintaining a safe and healthy workplace by following safety and health rules and practices, and reporting accidents, injuries and unsafe equipment, practices or conditions.

C. Abuse of Drugs and Alcohol

The misuse of drugs, both legal and illegal, interferes with a safe, healthy and productive work environment and is prohibited. Specifically, we prohibit the use, possession, distribution or sale of illegal drugs by its officers, directors, and employees. Furthermore, no officer, director or employee may conduct Bradley's business while under the influence of drugs or alcohol.

D. Confidentiality of Personal Data

Bradley recognizes that privacy is important to each of us. Bradley therefore limits access to, and knowledge of, officer, director and employee records to people who need the information for legitimate purposes. If you have access to records or personnel information about co-workers, take precautions to ensure that it is not misused or disclosed improperly. You should not disclose such information without the authorization of the Human Resources Manager. In addition, observe all applicable laws regarding employee information, including those regarding information gathering, those requiring maintenance of records for a specific time and at a specific location.

E. Disclosure of Nonpublic Information

Bradley forbids unauthorized disclosure of material non-public information about the Company or the companies it deals with, and both Company policy and the law forbid profiting from material non-public information relating to the Company or the companies with whom we do business. Material Information includes any information that a reasonable investor is likely to consider important in determining whether to buy, sell or hold a corporation's stock.

Examples of material information include:

1. Internal financial information;
2. Commencement of a new business or development or approval of a new product or technological breakthrough; or
3. Contemplated acquisition of another company or product line or disposition of an existing business or product line to another company.

Information is considered nonpublic if it has not been disseminated in a manner making it available to investors generally, such as disclosure in the Company's annual or periodic reports to its stockholders, inclusion in a press release or wide reporting in the media, and investors have a reasonable period to react to the information.

Like proprietary information, all officers, directors and employees should take great care not to disclose material nonpublic information within the Company, inadvertently or unnecessarily, and in no event to disclose such information outside the Company. As an officer, director or employee of Bradley, you should not discuss Company business where unauthorized persons may be present such as in elevators or restaurants, even if no names are used. In addition, disclosures to others within the Company is permissible only on a need-to-know basis.

Those possessing material nonpublic information may not buy or sell Company securities or disclose such information to anyone who is not an officer, director or employee of the Company. Likewise, officers, directors and employees of the Company with knowledge of nonpublic information about other companies (suppliers, customers or other companies the Company deals with), even those with whom the Company only contemplates transactions, may not buy or sell the securities of those companies or disclose such information to others.

Officers, directors and employees uncertain about the rules on buying or selling Bradley securities or securities of companies familiar to them as Bradley employees should review Bradley's Insider Trading Policy and, where appropriate, consult the Chief Financial Officer before making any purchases or sales.

V. SUPPLEMENTAL CODE FOR CHIEF EXECUTIVE OFFICER AND SENIOR FINANCIAL OFFICERS

In addition to this Code, the Chief Executive Officer and senior financial officers of Bradley are also subject to the provisions of Bradley's Supplemental Code of Ethics for the

Chief Executive Officer and senior financial officers, relating to, among other matters, Bradley's reporting and disclosure requirements.

VI. CERTIFICATION

All officers, directors and employees of Bradley Pharmaceuticals, Inc. are required to certify that they have read, understand, are in compliance with and will continue to comply with this Code of Business Conduct and Ethics (which shall be deemed to include, for Bradley's Chief Executive Officer and senior financial officers, the Supplemental Code mentioned above).