



Code of Ethics, issued in December 2004 by Diane Villax

The Hovione Code of Ethics

Fundamental Principles

Since its foundation, Hovione's activity has been governed by ethical values that have been transmitted down from our Founders, Diane and Ivan Villax. Hovione believes that the respect for these values is the basic principle for the healthy growth of the Company, permeating and guiding our business conduct and human relations. This behavior is based on trust, honesty and loyalty. These values express themselves in our sense of responsibility and diligence towards the Company and towards each other, in our compliance with the Law and in courteous and respectful behavior.

The Hovione Code of Ethics establishes fundamental rules of conduct which govern relationships between each other, and with the Company, our Clients, Suppliers, Lenders, Competitors, Shareholders, Public Authorities, and the Community. Hovione's ethical principles aim to establish and develop trust in all of our relationships. While the Company strives to defend and promote our scientific, industrial, commercial and financial interests, truth and honesty shall prevail above all.

Hovione is dedicated to serving the Pharma Industry by providing services and products that save human lives and improve quality of life. The mission of our Company and the nature of our activity implies great responsibility.

Hovione operates world-wide and is enriched by a multitude of cultures, races, nationalities and beliefs that contribute talent from a vast range of disciplines, from diverse backgrounds and different experiences: this quest for diversity and interaction is deliberate because it fosters innovation and promotes evolution.

Business will take care of itself if we focus on sound science, in remaining in compliance, if we are entrepreneurial and innovative and if we keep customers satisfied.

This document applies to all Team Members; it also applies to persons who are conducting business on behalf of Hovione and who are seen by third parties as representing the Company. Hovione expects from all Team Members, irrespective of their level of responsibility, a conduct in accordance with these principles, our values and our policies. In case of doubt in the application of any of these principles please seek advice from your line manager or from Human Resources.

This Code of Ethics is a set of principles. Local Hovione companies will use them to develop additional internal procedures if required by their own laws, regulations and local custom or business.

Rules of Conduct

1. Working at Hovione

- 1.1 *We trust each other and earn each other's trust by being fair, courteous and respectful. As Line Managers, we develop our teams through great leadership and ambitious goals, and set the example. As Team Members, we ensure our relationships with each other are professional at all times.*
- 1.2 *We are diligent in our tasks and work for the benefit of our business and the good of all.*
- 1.3 *We have a duty to uphold Hovione's reputation, interests and image of excellence.*
- 1.4 *We safeguard the best interests of the Company, respect its assets as we would our own. We will not use resources, information or authority for our personal use or gain.*
- 1.5 *We have a duty to observe, in all instances, our contractual obligation towards confidentiality and protect all Hovione information and know-how.*
- 1.6 *We use Authority with responsibility and fairness, and never undermine the importance and relevance of anyone's job.*
- 1.7 *If we hold other functions outside of the Company we must ensure that our activities are compatible with our employment contract and must not use our link with Hovione to further personal ends.*
- 1.8 *In case we are in a conflict of interest with Hovione or anyone else, we must inform and discuss the issue with our Line Manager or with Human Resources and we must solve it.*
- 1.9 *The Company will defend the interests of the shareholders, informing them of any financial and/or business situation, decision or action that may affect their investment or position as a shareholder.*

2. Dealing with our business partners

- 2.1 *The prosperity and future of Hovione is based on serving our clients to their satisfaction and expectations. We strive for a relationship of peers, based on dignity and mutual recognition of competence and merit and use diplomacy in informing our partners when behaviors need to be adjusted.*
- 2.2 *We treat clients with honesty, professionalism and openness.*
- 2.3 *We endeavor to supply products and services as agreed, namely in terms of quantity, quality, price, and delivery date, always conforming to specification and to the regulations per the terms of written agreements.*
- 2.4 *We inform clients without delay of any relevant or unexpected deviation from the agreed terms, conditions and specifications, whether technical, scientific or commercial.*
- 2.5 *We promote with our customers and other business partners long lasting partnerships, which are based on trust and are mutually beneficial.*
- 2.6 *We select our suppliers through an objective evaluation of competence, price, quality, delivery dates, payment terms, shared values and other due diligence issues, according to our requirements and interests.*
- 2.7 *Loyal competition is essential to establish a level playing field for all participants in the industry and for its sound development, and we will work to uphold and preserve it.*
- 2.8 *We will not obtain or acquire information about competitors in an illegal or irregular manner, we will not denigrate their reputation but endeavor to make objective comparisons.*
- 2.9 *We will not undertake any unethical business practices to attract a client to the detriment of a competitor.*

- 2.10 *We will not increase profits by any illegal or dishonest means. We will not accept any personal presents or personal favors, which are intended to influence the business relationship with the Company. Equally we will not bribe nor seek an unfair advantage, we will not behave anti-competitively.*
- 2.11 *We work with our business partners under contractual obligations of confidentiality. We protect and keep confidential all scientific, industrial and business information obtained under that relationship.*
- 2.12 *We never promise what we cannot keep or what is not ours to guarantee, as our promises bind the Company.*
- 2.13 *We investigate and respond to all complaints, striving to give each one equal attention, irrespective of origin.*

3. Respecting and obeying laws and regulations

- 3.1 *We respect the Law that rules everywhere we do business. We respect the truth, act honestly and in accordance with Industry regulations.*
- 3.2 *When we become aware of any instance of non-compliance with these rules or with this Code of Ethics, we inform the Company of any such instance.*
- 3.3 *We report our activities to Authorities as required by Law.*

4. Hovione and the Community

- 4.1 *Hovione uses transparency as a competitive advantage.*
- 4.2 *Hovione strives to maintain good and stable neighborly relations within its Community, takes an interest in its needs and contributes.*
- 4.3 *Hovione encourages dialogue and informs the public in a clear and accessible language of its activity and undertakings, opening its doors regularly to the Community, Authorities, Press, Academia and the Public in general.*
- 4.4 *Hovione organizes plant visits for schools and universities and other parties with an educational intent. All sites offer traineeships and summer jobs.*
- 4.5 *Hovione strives to constantly improve the conditions of its facilities and its performance in terms of safety, health and environmental protection and communicates its performance to the public.*
- 4.6 *Hovione takes all necessary measures within its possibilities to prevent or reduce environmental, material or personal damage, and is committed to sustainable development.*
- 4.7 *Hovione will offer help to Authorities in case of an incident outside the Company in the field of its expertise and available means.*
- 4.8 *Hovione collaborates with Authorities in issues relating to safety and environmental protection.*
- 4.9 *Partisan politics shall not take place within the Company.*

To facilitate communication an Ethics summary document was created:



Ethics

The Hovione Code of Ethics issued by Diane Villax, founder, in December 2004 establishes fundamental rules of conduct which govern the relationships between Team Members, between Team Members and the Company, Hovione's relationships with its Clients, Suppliers, Lenders, Competitors, Shareholders, Public Authorities, the Community where we operate and the Public at large.

Hovione expects from all Team Members, irrespective of their level of responsibility, a conduct in accordance with these principles, our values and our policies.

Our Rules of Conduct

1. We do the right things, for the right reasons in the right way.
2. We trust each other and treat each other in a fair, courteous and respectful manner.
3. We have a duty to uphold Hovione's reputation, interests and image of excellence.
4. We treat clients with honesty, professionalism and openness.
5. We work with our business partners under contractual obligations of confidentiality. We protect and keep confidential all scientific, industrial and business information obtained under that relationship. We protect all Hovione information and know-how and respect others' intellectual property rights.
6. We respect the Law that rules everywhere we do business. When we become aware of any instance of non-compliance with the Law or with this Code of Ethics, we inform the Company of any such instance.
7. We strive to maintain good and stable neighborly relations within our Community, take an interest in its needs and contribute.
8. We have zero-tolerance for:
 - using company resources, information or authority for our personal use or gain.
 - unethical business practices to attract a client to the detriment of a competitor.
 - accepting any personal presents or personal favors which are intended to influence the business relationship with the Company.
 - bribery or seeking an unfair advantage.
 - obtaining information about competitors in an illegal or irregular manner or denigrating their reputation.
 - colluding with competitors or competing disloyally.