

## Speak Up!

### Ethics Line Procedure - Governance & Ethics Committee

Hovione has built over the decades an impeccable reputation for strong and cohesive Values and unquestionable ethical behavior. We wish Hovione to remain that way. Despite our growth, we must continue to share the same Values and common goals, and above all, trust one another. Given our growing size, we consider it necessary to set up an ETHICS LINE to enable team members to **Speak Up!** if they evidence, experience or are victim of any wrong doing at Hovione.

The ETHICS LINE has been set up by the Governance and Ethics Committee ("**G&E Committee**") of the Board of Directors.

Through the ETHICS LINE, we encourage the confidential reporting regarding any of the following unacceptable situations:

- Bullying and Harassment
- Discrimination
- Unethical/ dishonest behavior or business practice
- Environmental, Health and Safety concerns
- Fraud
- Bribery and corruption
- Insider trading
- Improper use of Company resources
- Wrongful disclosure of confidential information
- Conflicts of interest
- Other forms of wrongdoing or illegality

#### ANONIMITY

We understand that it is not easy to **Speak Up!** and that it takes courage, as well as strong principles, to come forward. To ensure we retain our Values intact; we encourage you to report any situation if you feel you should. The members of the G&E Committee, together with Hovione, guarantee in such case:

- Anonymity, if so requested, and full confidentiality (so long as any court or administrative decision does not rule otherwise)
- That retaliation against you for using **Speak Up!** will not be tolerated and any attempts of retaliation will be treated as a serious matter which may give rise to disciplinary action.
- No judgement - you can feel safe and secure that there will be no judgement made on your action to **Speak Up!** in good faith, and that all reports will follow the same procedure irrespective of their nature.

#### WHAT TO DO IF YOU HAVE A CONCERN WITH A MISCONDUCT OR WRONGDOING:

- 1<sup>st</sup> course of action: Report it to your Line Manager
- 2<sup>nd</sup> course of action: Report it to HR, the Management Board or the CEO
- If none of the above have satisfied you or, for any reason, you do not wish to contact a Hovione employee, contact the ETHICS LINE.

#### HOW TO CONTACT THE ETHICS LINE:

- By email to [ethics@hovione.com](mailto:ethics@hovione.com) – this will reach the members of G&E Committee. You can set up a new email address if you wish to remain anonymous.

- By post, you may report by writing a letter addressed to: HOVIONE, Governance and Ethics Committee, Edificio R, Campus do IAPMEI, Estrada do Paço do Lumiar, Lisbon 1649-038 Lisboa, Portugal.
- By telephone, you may call any member of the G&E Committee by dialling the Hovione general number in any of the sites, giving the name of the G&E Committee member you wish to reach and the operator will put you through to the G&E Committee member you request.


### LANGUAGES:

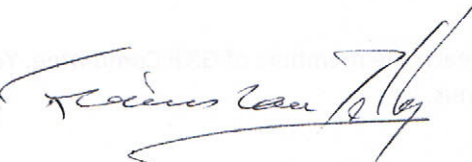
- English
- Portuguese
- For Chinese, please note that a translator will be needed.

### THE ETHICS LINE PROCEDURE:

- We will endeavor to understand your concern with maximum accuracy. If you are calling, we will listen attentively without interrupting and take down notes. We will then possibly ask questions for clarity, and will finally repeat back to you our understanding of the situation for your confirmation. If you are emailing, or mailing we will reply (if the information is provided) to acknowledge receipt of your report and possibly ask further questions for clarity.  
We will not provide comments or make any judgement, and will respect your requests.
- We will convene a meeting of the G&E Committee with urgency, and discuss the matter.
- A report will be written by the G&E Committee which will be shared with the CEO. A meeting will be convened to define next steps.
- Next steps must include, in due course, but without delay, the following:
  - An investigation carried under the authority of the G&E Committee.
  - A course of action, including the implementation of corrective and preventive actions to ensure absence of likely repetition, as decided by the G&E Committee together with the CEO.
  - In all cases an “event” shall be recorded in the IT application that reports things like deviations, complaints or audit observation within 30 days of a member of the G&E Committee being notified. The contents of such event, as well as its closure, shall be controlled by the G&EC.
- Throughout the process, we will, if possible, remain in contact with the reporting Team Member who will be kept informed of actions and decisions taken.

We thank you for working with us to ensure we all continue proud of the Company we work for and the way we do things.

Diane Villax 

Francisco Van Zeller 

Sofia Villax 