

TITLE: Ingenovis Health Anti-Harassment Policy	REFERENCE #: IGV-HR-POL-0140
DEPARTMENT: Human Resources	APPROVAL DATE: 02/05/2024
CATEGORY: Human Resource	EFFECTIVE DATE: 02/05/2024
APPROVER: Denise Triba	NEXT REVIEW DATE: 02/05/2025

1.0 Purpose and Scope

This policy and standards apply to all Ingenovis Health, Inc. (“Ingenovis”) employees and its subsidiaries’ employees, Ingenovis affiliate employees, contractors, business associates, and third parties (staff members or ‘users’) with authorization to access Ingenovis systems or data.

This policy and standards establish Ingenovis Health’s policy to prohibit intentional and unintentional harassment of or against job applicants, contractors, interns, volunteers, or employees by another employee, supervisor, vendor, customer, or third party based on actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth, and pregnancy-related conditions), gender identity or expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, genetic information, or any other characteristic protected by applicable federal, state, or local laws. Such conduct will not be tolerated.

Furthermore, any retaliation against an individual who has complained about sexual or other harassment or retaliation against individuals for cooperating with an investigation of a harassment complaint is similarly unlawful and will not be tolerated. Ingenovis Health will take all reasonable steps necessary to prevent and eliminate unlawful harassment.

2.0 Sanctions & Enforcement

Failure to comply with this policy and its associated standards may subject the Ingenovis User to disciplinary action consistent with the severity of the incident, which may include, but not limited to:

- Loss of access privileges to information resources
- Termination of employment or engagement
- Other actions as deemed appropriate by the joint determination of Legal & Compliance, Human Resources, Security, and/or the applicable leadership team.

For Users such as contractors, consultants, and vendors, failure to comply with this policy may subject the group to the dismissal of consultants and/or cancellation of contracts

based on a joint determination of the business unit or department that contracted the vendor or consultant, Legal & Compliance, and/or Human Resources teams.

3.0 Policy

Reference #	Policy Statement
SEC-0813	<p>Definition of “unlawful harassment.” “Unlawful harassment” is conduct that has the purpose or effect of creating an intimidating, a hostile, or an offensive work environment; has the purpose or effect of substantially and unreasonably interfering with an individual’s work performance; or otherwise adversely affects an individual’s employment opportunities because of the individual’s membership in a protected class.</p> <p>Unlawful harassment can include, but is not limited to, epithets; slurs; jokes; pranks; innuendo; comments; written or graphic material; stereotyping; or other threatening, hostile, or intimidating acts based on race, color, ancestry, national origin, gender, sex, sexual orientation, marital status, religion, age, disability, veteran status, or another characteristic protected by applicable law.</p> <p>Definition of “sexual harassment.” While all forms of harassment are prohibited, special attention should be paid to sexual harassment. “Sexual harassment” can include all of the above actions, as well as other unwelcome conduct, and is generally defined under both state and federal law as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature whereby:</p> <ul style="list-style-type: none"> • Submission to or rejection of such conduct is made either explicitly or implicitly a term or condition of any individual’s employment or as a basis for employment or other business decisions. • Such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, a hostile, or an offensive work environment.

	<ul style="list-style-type: none"> • Other sexually oriented conduct, whether intended or not, that is unwelcome and has the effect of creating a work environment that is hostile, offensive, intimidating, or humiliating to workers may also constitute sexual harassment. <p>While it is not possible to list all those additional circumstances that may constitute sexual harassment, the following are some examples of conduct that, if unwelcome, may constitute sexual harassment depending on the totality of the circumstances, including the severity of the conduct and its pervasiveness:</p> <ul style="list-style-type: none"> • Unwanted sexual advances, whether they involve physical touching or not; • Sexual epithets; jokes; written or verbal references to sexual conduct; gossip regarding one’s sex life; comments or depictions of or about an individual’s body; and comments about an individual’s sexual activity, deficiencies, or prowess; • Displaying sexually suggestive objects, pictures, or cartoons; • Unwelcome leering, whistling, brushing up against the body, sexual gestures, or suggestive or insulting comments; • Inquiries into one’s sexual experiences; and • Discussion of one’s sexual activities. <p>All employees should take special note that, as stated above, retaliation against an individual who has complained about sexual or other harassment and retaliation against individuals for cooperating with an investigation of sexual or other harassment complaints violate company policy.</p>
--	--

4.0 Standards

Reference #	Standard
-------------	----------

5.0 Related Documents

Reference #	Documents
SEC-REF-0100	Definitions

6.0 References

If you believe you have been subject to or have witnessed unlawful discrimination, including sexual or other forms of unlawful harassment, or other inappropriate conduct, you are requested and encouraged to make a complaint. You may complain directly to your immediate supervisor, department manager, the Human Resources Department, or the Legal & Compliance Department. Similarly, if you observe acts of discrimination toward or harassment of another employee, you are requested and encouraged to report this to one of the individuals listed above. Anonymous reporting, if preferred, is available through the Compliance Hotline, at (833)246-0128 or <https://secure.ethicspoint.com/domain/media/en/gui/85239/index.html>.

All complaints will be investigated promptly, and confidentiality will be protected to the extent possible. A timely resolution of each complaint should be reached and communicated to the parties involved. If the investigation confirms conduct that violates this policy has occurred Ingenovis Health will take immediate, appropriate, corrective action, including discipline, up to and including immediate termination.

No reprisal, retaliation, or other adverse action will be taken against an employee for making a complaint or report of discrimination or harassment or for assisting in the investigation of any such complaint or report. Any suspected retaliation or intimidation should be reported immediately to one of the persons identified above.

7.0 Exceptions

Requests for exceptions to this policy must be submitted to and approved by the Chief Information Security Officer or designee.

8.0 Revision History

Revision #	Date	Reviewer	Description of Changes
1.0	1/8/2024	Beth Freeman	Draft of policy in new format

9.0 Approval

Approver name	Marc Bonora
Approver title	General Counsel
Approver signature	<i>Marc Bonora</i>
Date	02/05/2025