

TITLE: Non-Retaliation Policy	REFERENCE #: IGV-HR-POL-0120
DEPARTMENT: Human Resources	APPROVAL DATE: 02/05/2024
CATEGORY: Human Resources	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 aims to protect individuals against retaliation for reporting, in good faith, ethics or compliance concerns, or other inappropriate behavior.

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

Policy Statement

The Company promotes a culture where employees are encouraged, in good faith, to report ethics or compliance concerns without fear of retaliation. This policy expressly prohibits any form of retaliation against any individual for engaging in this protected activity.

DEFINITIONS

A. "Retaliation" is any kind of negative action against a person that takes the form of punishment or creates a hostile, threatening, or uncomfortable environment as a result of the person's reported complaint or lawful actions. Retaliation may be expressed in a variety of ways, including but not limited to the following:

- Victimization
- Termination or illegal retraction of benefits
- Reduction of compensation
- Poor work performance evaluation
- Exclusion from company events or meetings
- Defamation of character
- Demotion

Every report of retaliation will be fully investigated by the Compliance Department. Employees found to have engaged in retaliatory behavior will be subject to disciplinary action up to and including termination.

4.0 Standards

Employees or other persons who believe they have been subject to retaliation for reporting, in good faith, a violation of the Company's code of conduct, policies, applicable laws, rules and regulations, or any other inappropriate behavior, should report it to their supervisor, manager, Human Resources, the Legal & Compliance Department, or they may also report issues through the Compliance Hotline – a service that allows violations or concerns to be reported anonymously. The Hotline is operated offsite by a third-party administrator and is available toll-free 24 hours a day, seven days a week, at (833)246-0128, or online at [EthicsPoint](#).

Every report of retaliation will be fully investigated by the Compliance Department. Employees or other persons found to have engaged in retaliatory behavior will be subject to disciplinary action up to and including termination of employment or engagement.

5.0 Revision History

Revision #	Date	Reviewer	Description of Changes
1.0	07/27/23	Jeff Lynch	Draft of new policy

6.0 Approval

Approver name	Marc Bonora
Approver title	General Counsel
Approver signature	<i>Marc Bonora</i>
Date	02/05/2024