

TITLE: Workplace Bullying Policy	REFERENCE #: IGV-HR-POL-0150
DEPARTMENT: Human Resources	APPROVAL DATE: 02/05/2024
CATEGORY:	EFFECTIVE DATE: 02/05/2024
APPROVER:	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 to all employees, including supervisors, managers and executives, that Ingenovis Health will not in any instance tolerate bullying behavior or hate speech. Employees found in violation of this policy will be disciplined, up to and including termination.

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	Ingenovis defines bullying as inappropriate behavior, either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of or related to employment, intending to or resulting in singling out,

	<p>harassing, disparaging, embarrassing, or gaining advantage over another individual or individuals. Such behavior violates Ingenovis Health’s Code of Conduct and Core Values, which clearly states that all employees will be treated with dignity and respect.</p> <p>Ingenovis Health considers the following types of behavior examples of bullying:</p> <p>Verbal bullying: Slandering, ridiculing or maligning a person or his or her family; persistent name calling that is hurtful, insulting or humiliating; using a person as butt of jokes; abusive and offensive remarks.</p> <p>Physical bullying: Pushing, shoving, kicking, poking, tripping, assault, battery or threat of physical assault or battery, including by physically approaching someone or gesturing even if contact does not occur, damage to a person’s work area or property</p> <p>Gesture bullying: Nonverbal threatening gestures; glances that can convey threatening messages.</p> <p>Exclusion/Inclusion: Socially or physically excluding or disregarding a person in work-related activities or singling them out or making an example of them in a manner that results in bullying.</p>
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4.0 Standards

Reference #	Standard
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5.0 Related Documents

Reference #	Documents
SEC-REF-0100	Definitions

6.0 References

If you believe you have been subject to or have witnessed workplace bullying, 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 workplace bullying 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>

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	02/05/2024