

TITLE: Non-Discrimination Policy	REFERENCE #: IGV-HR-POL-0130
DEPARTMENT: Human Resources	APPROVAL DATE: 02/05/2024
CATEGORY: Human Resources	EFFECTIVE DATE: 02/05/2024
APPROVER: Denise Triba	NEXT REVIEW DATE: 02/05/2026

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.

Ingenovis Health is committed to fostering a workplace environment that promotes diversity, inclusion and equal opportunity. This policy aims to ensure that all employees, job applicants, clients and business partners are treated with fairness, dignity and respect, free from any form of discrimination or 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

Policy Statement
3.1 Equal Employment Opportunity Ingenovis is an equal opportunity employer and does not discriminate against any individual or group on the basis of race, color, religion, sex, gender identity, sexual

orientation, national origin, age, disability, genetic information, marital status, or any other protected characteristic as defined by applicable laws and regulations.

3.2 Prohibited Conduct

All forms of discrimination, harassment, or retaliation are strictly prohibited. This includes, but is not limited to:

- Direct or indirect discrimination based on any protected characteristic.
- Harassment, including verbal, physical, or visual conduct that creates an intimidating, hostile, or offensive work environment.
- Retaliation against individuals who report discrimination, participate in investigations, or oppose discriminatory practices.

3.3 Employment Decisions

Employment decisions at Ingenovis, such as hiring, promotion, compensation, benefits, training, and termination, are based on merit, qualifications, and job-related criteria. There will be no preference given to any individual based on their protected characteristics.

3.4 Reporting and Complaint Procedures

Employees or other persons who believe they have experienced or witnessed discrimination, harassment, or retaliation should promptly report the incident 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](#).

3.5 Confidentiality and Non-Retaliation

Ingenovis will handle all reports and investigations with sensitivity and confidentiality to the extent possible, considering the need to conduct a thorough investigation. The company strictly prohibits retaliation against individuals who report discrimination or participate in investigations. Retaliation is a violation of this policy and will result in disciplinary action.

3.6 Compliance and Accountability

All employees are expected to comply with this non-discrimination policy. Managers and supervisors have a responsibility to address and prevent discrimination, harassment, and retaliation in the workplace. Violations of this policy may result in disciplinary action, up to and including termination of employment.

3.7 Policy Review

This policy will be periodically reviewed and updated to ensure its effectiveness, compliance with applicable laws, and alignment with best practices.

By adhering to this non-discrimination policy, we aim to create an inclusive and respectful workplace for all individuals associated with Ingenovis.

4.0 Revision History

Revision #	Date	Reviewer	Description of Changes
1.0	07/27/23	Jeff Lynch	Draft of new policy
1.1	02/28/25	Beth Freeman	Annual review, no change

5.0 Approval

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