



TITLE: Policy Against Discrimination, Harassment, and Retaliation	REFERENCE #: IGV-HR-POL-0160
DEPARTMENT: Human Resources	APPROVAL DATE: 2/2/2026
CATEGORY: Human Resources	EFFECTIVE DATE: 2/2/2026
APPROVER: Beth Freeman	REVISION DATE: 8/6/2026

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, and free from any form of discrimination, harassment, or retaliation.

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 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

3.1 Equal Employment Opportunity

Ingenovis is an equal opportunity employer and does not discriminate against any individual or group on the basis of age; race (including traits associated with race, including, but not



Enterprise Policy

limited to, hair texture and protective hairstyles); height; weight; religion; caste; creed (including religious dress and grooming practices); color; national origin; ancestry; sex; sexual orientation; gender (including gender identity and expression); alienage or citizenship status; military or veteran status; physical or mental disability (actual or perceived); medical condition; AIDS/HIV status; denial of family and medical care leave; genetic information; predisposition or carrier status; pregnancy status; childbirth; breastfeeding (or related medical conditions); marital status or registered domestic partner status; political activity or affiliation; status as a victim of domestic violence, sexual assault, stalking, or other qualifying act of violence; arrest record; taking or requesting statutorily protected leaves; off-duty marijuana use (when protected by law); reproductive health decision-making; driver's license status; or any other protected characteristic as defined by applicable laws and regulations.

This policy prohibiting discrimination, harassment, and retaliatory conduct covers all employees of Ingenovis (including, but not limited to, all supervisors and managers of Ingenovis), applicants, paid and/or unpaid interns, volunteers, persons providing services to Ingenovis pursuant to a contract, consultants, and other third parties over whom Ingenovis has control (regardless of their status). It also prohibits harassment, discrimination and retaliation based on the perception that anyone has any of the protected characteristics, is associated with a person who has or is perceived as having any of those characteristics, or due to the intersection or combination of any those characteristics.

3.2 Prohibited Conduct

Discrimination Defined

As used in this policy, "discrimination" is defined as the unequal treatment of an employee or applicant in any aspect of employment, based solely or in part on the employee's, or applicant's, protected characteristic, including their perceived protected characteristic, or the intersection or combination of any protected characteristic. Discrimination includes unequal treatment based upon the employee's or applicant's association with a member of these protected classes.

Discrimination may include, but is not necessarily limited to, hostile or demeaning behavior toward applicants or employees because of their protected characteristic; allowing the applicant's or employee's protected characteristic to be a factor in hiring, promotion, compensation or other employment-related decisions unless otherwise permitted by applicable law; and providing unwarranted assistance or withholding work-related assistance, cooperation, and/or information to applicants or employees because of their protected characteristic.



Harassment Defined

As used in this policy, “harassment” is defined as unwelcome disrespectful or unprofessional conduct, including disrespectful or unprofessional conduct based on any of the protected characteristics listed above. Harassment can be verbal (such as slurs, jokes, insults, epithets, gestures, or teasing), visual (such as the posting or distribution of offensive posters, symbols, cartoons, drawings, computer displays, or e-mails), or physical conduct (such as physically threatening another person, blocking someone’s way, or making physical contact in an unwelcome manner).

Sexual Harassment Defined

As used in this policy, “sexual harassment” is defined as harassment based on sex (including pregnancy, childbirth, breastfeeding, or related medical conditions), gender, gender identity, gender expression or sexual orientation. It may include all of the actions described above as “harassment,” as well as other unwelcome sex-based conduct, such as unwelcome or unsolicited sexual advances, requests for sexual favors, conversations regarding sexual activities, or other verbal or physical conduct of a sexual nature. Sexually harassing conduct need not be of a sexual nature or be motivated by sexual desire. It may include situations that began as reciprocal relationships but that later cease to be reciprocal.

Sexual harassment is generally categorized into two types:

1. Quid Pro Quo Sexual Harassment (“this for that”)
 - a. Submission to sexual conduct (or other harassing conduct) is made explicitly or implicitly a term or condition of an individual’s employment.
 - b. Submission to or rejection of the conduct by an employee is used as the basis for employment decisions affecting the individual.
2. Hostile Work Environment Sexual Harassment
 - a. Unwelcome conduct on the basis of sex, gender, gender identity, gender expression, or sexual orientation by any person in the workplace that unreasonably interferes with an employee’s work performance and/or creates an intimidating, hostile or otherwise offensive working environment. When unwelcome, examples include but are not limited to:
 - i. Sexual advances, flirtation, teasing, sexually suggestive or obscene letters, invitations, notes, e-mails, voicemails or gifts.



- ii. Sex, gender or sexual orientation–related comments, slurs, jokes, remarks, or epithets.
- iii. Leering, obscene, or vulgar gestures or making sexual gestures.
- iv. Displaying or distributing sexually suggestive or derogatory objects, pictures, cartoons, or posters.
- v. Impeding or blocking movement, touching, or assaulting others.
- vi. Reprisals or threats after a negative response to sexual advances.
- vii. Conduct or comments consistently targeted at one gender, even if the content is not sexual.

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 the Human Resources 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 [Ethico](#). Supervisors are required to promptly report any complaints to Human Resources.

In addition to Ingenovis’s internal complaint procedure, employees should also be aware that the federal Equal Employment Opportunity Commission (“EEOC”) and, in California, the CRD, investigate and, in appropriate cases, prosecute complaints of harassment, discrimination, and retaliation in employment. The EEOC and CRD may, after a hearing, award damages to individuals actually injured as a result of such conduct, as well as other remedies. Employees have three years to file a complaint with the CRD. Information about the EEOC complaint procedure can be found on its website (www.eeoc.gov), or by calling 1-800-669-4000 (English), or 1-800-669-6820 (TTY). Information about the CRD can be found on its website (www.calcivilrights.ca.gov), or by calling 1-800-884-1684 (English), or 1-800-700-2320 (TTY).

3.5 Investigation and Resolution



When an employee or other covered individual reports harassment, discrimination, or other misconduct under this policy, then Ingenovis will use qualified personnel to conduct a fair, impartial, timely, and thorough investigation that provides all parties appropriate due process and reaches reasonable conclusions based on the evidence collected. The steps of an appropriate investigation cannot be fixed in advance, but will vary depending upon the nature of the allegations. Ingenovis will utilize appropriate documentation and tracking to ensure reasonable progress, timely response to the complaint, and timely closure of the investigation. Ingenovis will seek to maintain confidentiality throughout the investigative process to the extent possible, but cannot maintain complete confidentiality, consistent with Ingenovis's need to comply with applicable law and to undertake a prompt, full, and thorough investigation. It is a condition of employment that employees cooperate with all Ingenovis investigations.

Upon completion of the investigation, Ingenovis will resolve the complaint and take appropriate remedial measures if misconduct is found during the investigation. Remedial actions may include, but are not necessarily limited to, oral or written counseling, referral to formal counseling, disciplinary suspension or probation, and/or discharge from Ingenovis.

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 Non-Retaliation

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.

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. As used in this policy, "retaliation" is defined as any adverse employment action taken against an applicant or employee because that person engaged in activity protected under this policy or reasonably thought to be protected under this policy.



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An “adverse employment action” is conduct or an action that materially affects the terms and conditions of the applicant’s or employee’s employment status or is reasonably likely to deter the person from engaging in protected activity. Even an action that does not result in a direct loss of compensation or in termination may be regarded as an adverse employment action when considered in the totality of the circumstances.

Examples of adverse employment actions includes, but is 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

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 the Human Resources Department, or they may also report issues through the Compliance Hotline, as described above.

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.

3.8 Training

All California-based employees are required to attend mandatory sexual harassment training, including a component on abusive conduct, as well as harassment based on gender identity, gender expression, and sexual orientation, in accordance with applicable law. All California-based employees will receive this training within six months of their hire and, if applicable, assumption of a supervisory position. Thereafter, all California-based employees will receive this training at least once every two years. All California-based seasonal or temporary employees, or any other employees hired to work for less than six months, will receive this training within 30 calendar days after their hire date or within 100 hours worked, whichever occurs first.

The CRD provides free online training courses on preventing sexual harassment and abusive conduct in the workplace that satisfy California’s legal training requirements and which may be



Enterprise Policy

accessed at the CRD website at <https://www.calcivilrights.ca.gov/shpt/>.

3.9 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 Policy Against Discrimination, Harassment, and Retaliation, we aim to create an inclusive and respectful workplace for all individuals associated with Ingenovis Health.

4.0 Revision History

Revision #	Date	Reviewer	Description of Changes
1.0	07/02/25	Jeff Lynch	Draft of new consolidated policy
1.1	08/01/25	Denise Triba	Approval final consolidated policy
1.2	1/30/26	Jennifer Schwartz	Updated reporting instructions
1.3	8/6/26	Jennifer Schwartz	Updated Approver Name and Revision Date

5.0 Approval

Approver name	Beth Freeman
Approver title	SVP, Human Resources
Approver signature	<i>Beth Freeman</i>
Date	8/6/2026