

Title: Affirmative Action Policy

1. PURPOSE AND SCOPE

The purpose of this Policy and Procedure is to define HR's guiding principles with respect to Affirmative Action. This policy and procedure applies to all US Based Colleagues.

2. POLICY

Leading Edge Pharms has been and will continue to be an equal opportunity employer, consistent with its Corporate Policy, Equal Opportunity. Leading Edge Pharms has implemented this Affirmative Action Policy as part of its longstanding commitment to compliance with all applicable equal opportunity and affirmative action requirements. In view of its affirmative action obligations, Leading Edge Pharms is committed to taking positive steps to employ, advance in employment, and otherwise treat qualified applicants and employees without regard to their race, color, religion, sex, sexual orientation, gender identity, national origin, citizenship, age, veteran status, or disability. The Company's Equal Opportunity and Affirmative Action Policy require that employment decisions be based only on valid job requirements, and extend to all terms, conditions, and privileges of employment including, but not limited to, recruitment, hiring, selection, compensation, benefits, training, promotion, transfer and disciplinary actions.

Leading Edge Pharms will also provide reasonable accommodation to the known physical or mental limitations of an otherwise qualified colleague or applicant for employment, unless the accommodation would impose undue hardship on the operation of the Company's business.

The Company's Affirmative Action Policy also prohibits colleagues and applicants from being subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in (1) filing a complaint; (2) assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of EO 11246, Section 503, VEVRAA, or any other federal, state or local law requiring equal opportunity on the basis of race, color, religion, sex, sexual orientation, gender identity, national origin, citizenship, age, veteran status, or disability; (3) opposing any act or practice made unlawful by of EO 11246, Section 503, VEVRAA, and their implementing regulations, or any other federal, state or local law requiring equal opportunity for minorities, women, protected veterans or individuals with disabilities; or (4) exercising any other right protected by EO 11246, Section 503, VEVRAA, and their implementing regulations.

David Chadwick, as the Company's Chairman and Chief Executive Officer, fully supports Leading Edge Pharms' Equal Opportunity and Affirmative Action program and is committed to the implementation of the Company's Affirmative Action Policy. Overall responsibility for the Affirmative Action Policy, including implementation and monitoring of our affirmative action program, has been delegated to Gary Killoran, CFO, who is designated as the Corporate EEO Officer. As part of this responsibility, his office, along with Affirmative Action Program Coordinators assigned to each site, will periodically analyze the Company's personnel actions and their effects to ensure full compliance with our Affirmative Action Policy.

The affirmative action program for protected veterans and individuals with disabilities is available for inspection upon request by any colleague or applicant for employment. If you, as one of our colleagues or as an applicant for employment, have any questions about this policy, would like to review our affirmative action programs, or would like to be considered under our Affirmative Action Program, as a

colleague please contact your HR contact or as an applicant please contact your Talent Acquisition recruiter during regular business hours. Please also be aware that as a colleague you may update your disability self-identification status at any time.

It is expected that all colleagues will support and assist in the Company's efforts to attain our objective of equal employment opportunity for all.

3. DEFINITIONS

The following definitions apply to this Policy:

Disability: A physical or mental impairment that substantially limits one or more major life activities, or a record of such an impairment, or being regarded as having such an impairment.

Protected Veterans: means the following categories of veterans:

- (1) disabled veterans defined as (a) veterans of the U.S. military, ground, naval or air service who are entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs; or (b) persons who were discharged or released from active duty because of a service-connected disability;
- (2) recently separated veterans defined as any veterans during the three-year period beginning on the date of such veteran's discharge or release from active duty in the U.S. military, ground, naval, or air service;
- (3) active duty wartime or campaign badge veterans defined as veterans who served on active duty in the U.S. military, ground, naval or air service during a HR US Policy Title: Affirmative Action Policy war, or in a campaign or expedition for which a campaign badge has been authorized under the laws administered by the Department of Defense; and
- (4) Armed Forces service medal veterans defined as veterans who, while serving on active duty in the U.S. military, ground, naval or air service, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985.

4. REFERENCES

Corporate Policy, Equal Opportunity

HR US Policy - Americans With Disabilities Act Accommodation Policy