

Title: Discrimination, Harassment and Retaliation Prevention Policy

1. PURPOSE AND SCOPE

The purpose of this Policy is to define Leading Edge Pharms' guiding principles and procedures with respect to the prevention of discrimination, harassment and retaliation in the workplace. This Policy applies to all U.S. and Puerto Rico-based colleagues.

2. POLICY

Leading Edge Pharms is committed to a workplace free of discrimination, harassment and retaliation. Consistent with our core values and commitment to integrity, trust and respect in the workplace, Leading Edge Pharms prohibits discrimination, harassment or retaliation of or against our colleagues, job applicants, contractors, interns, or volunteers by any colleague, supervisor, vendor, customer, or third party on the basis of race, religious creed, color, age, sex, sexual orientation, gender, gender identity, gender expression, national origin, ancestry, citizenship status, marital status, medical condition as defined by state law (including cancer or genetic characteristics), disability, military service and veteran status, pregnancy, childbirth and related medical conditions, or any other characteristic protected by applicable federal, state, or local laws and ordinances.

3. DEFINITIONS

The following definitions apply to this Policy:

A. DISCRIMINATION

Under this Policy, discrimination means treating an individual differently or denying or granting a benefit to an individual because of his or her protected characteristic(s).

B. HARASSMENT

Harassment is generally defined under this Policy as unwelcome verbal, written, visual, physical or similar conduct that creates an intimidating, offensive, or hostile work environment that interferes with work performance. Harassment can be verbal (including slurs, jokes, insults, epithets or teasing), graphic or written (including offensive posters, symbols, cartoons, drawings, computer displays, videos, posts on social media or e-mails) or physical conduct (including physically threatening another, blocking someone's way or making offensive gestures) or behavioral (including victimizing, ostracizing, bullying, or excluding another person) that denigrates or demonstrates hostility or aversion towards an individual because of any protected characteristic. All such conduct violates this Policy. Because it can be difficult to define unlawful harassment, colleagues are expected to behave at all times in a professional and respectful manner consistent with Leading Edge Pharms's values and culture.

C. SEXUAL HARASSMENT

Sexual harassment can include discrimination and harassment as defined above, as well as other unwelcome conduct, communications, behaviors or actions such as unwelcome or unsolicited sexual advances, requests for sexual favors, conversations regarding sexual activities and other verbal or physical conduct of a sexual nature.

Sexual harassment in the workplace is unlawful.

Examples of conduct that violate this Policy include:

- unwelcome sexual advances, flirtations, leering, whistling, touching, hugging, kissing, pinching, assault, blocking normal movement
- requests for sexual favors or demands for sexual favors in exchange for favorable treatment
- obscene or vulgar gestures, posters, or comments
- sexual jokes or comments about a person's body, sexual prowess, or sexual deficiencies
- propositions, or suggestive or insulting comments of a sexual nature
- sending, displaying or showing derogatory cartoons, posters, and drawings
- sexually explicit e-mails, texts, voicemails or posts on social media
- uninvited touching of a sexual nature
- unwelcome sexually-related comments
- conversation about one's own or someone else's sex life
- conduct or comments consistently targeted at only one gender, even if the content is not sexual
- teasing or other conduct directed toward a person because of the person's gender
- sending, displaying or showing pornographic or other sexual material

Sexual harassment also includes unwelcome sexual advances or requests for sexual favors where submission to such conduct is made an explicit or implicit term or condition of employment, or where submission to or rejection of such conduct is made the basis of employment decisions affecting an individual such as hiring, compensation, performance evaluation, promotion or continued employment. This is known as quid pro quo harassment.

In addition, a manager may not date or have a romantic or sexual relationship with any colleague who is in his or her reporting line or whose compensation, performance evaluation and/or career advancement the manager may influence. Similarly, a manager may not date or have a romantic or sexual relationship with a contingent worker whom the manager sponsors or whose assignment the manager otherwise may influence. If a manager becomes involved in such a relationship, he or she must inform his or her manager or Human Resources promptly so that the Company can evaluate the circumstances and take appropriate action (e.g., change assignments or reporting relationships) as needed. A manager who violates these requirements will be subject to disciplinary action up to and including termination.

D. RETALIATION

Retaliation means adverse action taken against an individual because he/she engages in protected conduct by reporting an actual or perceived violation of policy, opposing practices prohibited by policy, participating in the reporting and investigation process described below, or testifying or assisting in any proceeding under the law. It is unlawful to retaliate against an employee for engaging in such protected conduct. "Adverse action" includes but is not limited to: shunning and avoiding an individual who reports harassment, discrimination or retaliation; express or implied threats or intimidation intended to prevent an individual from reporting harassment, discrimination or retaliation; and denying employment benefits because an applicant or colleague reported harassment, discrimination or retaliation or participated in the reporting and investigation process described below.

E. Workplace

Workplace is defined as anywhere colleagues are conducting business on Leading Edge Pharms's behalf including, but not limited to, company premises, company-sponsored events, business trips, business-related social functions and the premises of clients, customers, vendors or business partners.

ALL DISCRIMINATION, HARASSMENT AND RETALIATION IS UNACCEPTABLE IN THE WORKPLACE REGARDLESS OF WHETHER THE CONDUCT IS ENGAGED IN BY A MANAGER, CO-WORKER, CLIENT, CUSTOMER, VENDOR, OR OTHER THIRD PARTY.

4. REPORTING PROCEDURES

All colleagues are responsible for raising concerns about discrimination, harassment, sexual harassment, retaliation and other workplace issues as soon as they are aware of them. These obligations apply equally to colleagues who may be the subject of the behavior and those who may be aware of and/or witnessed the behavior. By raising concerns, colleagues fulfill their responsibility to the Company and give the Company the opportunity to address potential problems and protect Leading Edge Pharms, co-workers and the public.

Colleagues have multiple reporting channels by which to raise concerns so as to help ensure that the work environment at Leading Edge Pharms is respectful, professional, and free of discrimination, harassment and retaliation. If a colleague believes someone has violated this Policy the colleague should promptly bring the matter to the immediate attention of any of the following:

- the colleague's immediate manager;
- the next higher level of management;
- the operating unit head;
- the local Human Resources representative; or
- the Corporate Human Resources Group or Employee Relations.

Colleagues also may reach out to the Compliance Division by phone or by e-mail, including anonymously through the Compliance Hotline; the Legal Division; or any manager.

Applicants for employment who wish to raise concerns under this Policy may contact any Leading Edge Pharms manager or Human Resources professional or the Compliance Division.

If an individual makes a complaint under this Policy and has not received a response within five (5) business days, he or she should contact the Compliance Division immediately at (800) 813-0013 or corporate.compliance@leadingedge.com.

In addition, any manager who learns of any individual's concern about conduct in violation of this Policy, whether in a formal complaint by that individual or informally, must immediately report the issues raised to his or her management or local Human Resources representative.

Separate from the formal reporting procedures set forth above, colleagues also have the opportunity to contact the Office of the Ombudsman for guidance on addressing workrelated issues in an informal, confidential manner. Please note that communications with the Ombudsman are "off-the-record" and do not constitute notice or reporting to the Company for any purpose.

5. INVESTIGATION PROCEDURES

Upon receiving a complaint, the Company will promptly conduct an investigation into the facts and circumstances of any claim of a violation of this Policy. To the extent possible, the Company will endeavor to keep the reporting individual's concerns confidential. However, complete confidentiality may not be possible in all circumstances.

During the investigation, the Company generally will conduct interviews with relevant personnel, including the complainant, the accused, and witnesses, and review any relevant documents or other information. Upon completion of the investigation, the Company shall determine whether this Policy has been violated based upon its reasonable evaluation of the information gathered during the investigation. The Company will inform the complainant and the accused whether a violation has been found to exist, and will inform the accused and any other personnel engaged in improper conduct of any remedial or corrective actions that will be taken against them.

The Company will take appropriate corrective measures against any person who it finds to have engaged in conduct in violation of this Policy. These measures may include, but are not limited to, coaching or counseling, Written Warning, Incident Final Warning or termination. Anyone, regardless of position or title, whom the Company determines has engaged in conduct that violates this Policy will be subject to discipline, up to and including termination. In addition, any manager who learns of and fails to report conduct in violation of this Policy and knowingly allows such conduct to continue will also be subject to appropriate discipline up to and including termination.

Remember, the Company cannot investigate and remedy claimed discrimination, harassment or retaliation unless colleagues bring these claims to the attention of the Company. Please report any conduct which you believe violates this Policy.