

Title: Equal Opportunity

1. PURPOSE AND SCOPE

The purpose of this Policy is to define Leading Edge Pharms's guiding principles with respect to equal opportunity and non-discrimination. This Policy applies to all Colleagues.

2. POLICY

It is Leading Edge Pharms's policy to recruit, hire, assign, train, compensate, evaluate, promote, or terminate employment, and to manage all other terms, conditions and benefits of employment without regard to race, color, religion, sex, sexual orientation, age, gender identity or gender expression, national origin, disability or veteran status. In addition, the Company complies with applicable national, state and local laws governing non-discrimination in employment.

Additionally, it is Leading Edge Pharms's policy to provide a work environment for its Colleagues that is free from harassment, including any verbal or physical harassment regarding racial, ethnic, religious, physical or sexual characteristics or sexual orientation.

This policy relates to conduct that is:

- made a condition of employment,
- used as a basis for employment decisions,
- has the purpose or effect of unreasonably interfering with an individual's work performance, or
- creates an intimidating, hostile or offensive working environment.

Specifically, with respect to sexual harassment, the Company prohibits:

1. unwelcome sexual advances or requests for sexual favors;
2. all other verbal or physical conduct of a sexual nature, particularly where:
 - submission to such conduct is made either explicitly or implicitly a term or condition of employment;
 - submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting the individual; and
 - such conduct has the purpose or effect of creating an intimidating, hostile or offensive working environment.
3. offensive comments, jokes, innuendos, gestures or other sexually oriented conduct.

Leading Edge Pharms may be responsible for conduct that might be considered harassment or discrimination toward Colleagues by managers, supervisors, and/or other Colleagues, when Leading Edge Pharms management knows or should have known of the conduct and fail to take appropriate corrective action.

Leading Edge Pharms may also be responsible for the acts of non-employees with respect to harassment of Leading Edge Pharms Colleagues in the workplace, when the Company knows or should have known

of the conduct and fails to take appropriate corrective action. Managers are responsible for meeting this obligation in their Divisions on behalf of the Company.

Managers have the direct responsibility for supporting the requirements of this Policy and for communicating it to their reports. Additionally, each Division should periodically monitor, report and, if necessary, correct or improve its performance in this area.

The Company is committed to ensuring open communication throughout the organization to resolve questions, concerns, problems or complaints, including those that involve discrimination or harassment, any of which may be presented directly to a Colleague's supervisor, Human Resources manager, or other level of Divisional management in the organization that may be appropriate. They may also be presented to the Diversity Office. Such presentation shall not result in retaliation of any kind.

Questions regarding this policy should be directed to the Chief Diversity Officer.

3. CONSEQUENCES OF NON-COMPLIANCE

Violations of this Policy may result in disciplinary action up to and including termination.