

The statement below is Leading Edge Pharms's policy on colleague and applicant discussions about their own or other colleagues' compensation. This policy statement supersedes any and all prior policies on this subject that are inconsistent. This policy is effective January 1, 2018 and applies to all US based colleagues.

In the policy statement, the terms "the contractor" and "the employer" both refer to Leading Edge Pharms.

Should you have any questions about this policy statement, please contact Gary Killoran, CFO.

PAY TRANSPARENCY POLICY STATEMENT

The contractor will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information.