

Formative Pharma Inc.
4145 North Service Road, Suite 200
Burlington, ON, L7L 6A3
Canada



Human Rights Policy

Mission Statement

Respecting human rights is fundamental to Formative Pharma's core values of trust, integrity, and compassion. Our mission is to ensure that all Canadians receive the best possible care, and this means not only carrying out our business activities with absolute integrity and transparency, but also acting with compassion, dignity, and respect for all persons in all that we do.

Formative Pharma is committed to respecting human rights as set out in the Canadian Human Rights Act and the Ontario Human Rights Code. We are also committed to upholding the principles of the United Nations ("UN") Universal Declaration of Human Rights and the International Labour Organization ("ILO") Declaration on Fundamental Principles and Rights at Work.

Purpose

The purpose of this Human Rights Policy (the "Policy") is to establish and communicate Formative Pharma's approach and commitment to respecting human rights and how this commitment is embedded in Formative Pharma's procedures and processes.

Application and Review

This Policy applies to all employees of Formative Pharma, its contractors, and its suppliers who are engaged in business, business-related activities, or business-related relationships. All employees, contractors, and suppliers that conduct business activities on behalf of Formative Pharma are expected to understand and work in alignment with the commitments described within this Policy. If there are any inconsistencies between this Policy and applicable laws, this Policy will be interpreted to give effect to, and comply with, such applicable laws.

This Policy shall be reviewed at least once every three years, or more frequently as stipulated by the approver, or whenever a significant change occurs, including changes to applicable laws or changes to Formative Pharma's business operations, which may impact the content included herein.

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Accessibility for Persons with Disabilities

Formative Pharma is committed to ensuring equal access and participation for people with disabilities and treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely, efficient, and respectful manner. We will uphold this commitment by removing and preventing barriers to accessibility whenever and wherever practicable, and meeting our accessibility requirements under the Accessibility for Ontarians with Disabilities Act ("AODA") and the Province of Ontario's accessibility laws.

Non-Discrimination and Anti-Harassment

Formative Pharma is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination. We are committed to providing a safe, harassment- and violence-free workplace for all employees, contractors, suppliers, and visitors to our premises, and treating all employees, contractors, suppliers, and visitors to our premises with utmost respect, dignity, and care.

Formative Pharma prohibits all forms of workplace harassment, violence, and discrimination against any person based on race, national or ethnic origin, colour, religion, age, sex, sexual orientation, gender identity or expression, marital status, family status, genetic characteristics, disability, or any of the other prohibited grounds listed in the Canadian Human Rights Act. Any recruitment, hiring, placement, development, training, compensation, and advancement practice observed at Formative Pharma is non-discriminatory and strictly based on qualifications, performance, skills, and experience. All Formative Pharma employees are required to immediately report any known or suspected incidents of discrimination, harassment, or violence. We maintain a strict no-retaliation policy to protect any person making an allegation in good faith.

Diversity, Equity, and Inclusion

Formative Pharma is committed to establishing and maintaining a diverse, equitable, and inclusive workplace, especially for individuals who have historically been excluded from, and underrepresented in, the pharmaceutical supply chain. This includes, but is not limited to, Indigenous Peoples; people with disabilities; individuals from racialized groups; individuals of diverse faiths and creeds; and people with diverse gender identities or expressions.

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We are committed to developing, implementing, and maintaining good practices to enhance diversity, equality, and inclusion at Formative Pharma. We will uphold this commitment throughout all stages and aspects of the employment cycle, including recruitment, retention, development, and advancement.

Healthy and Safe Working Conditions

At Formative Pharma, the physical, emotional, and mental well-being of our employees, contractors, and suppliers is a priority. We are committed to establishing and maintaining a physically, emotionally, and mentally safe, healthy, and productive workplace for all employees, contractors, and suppliers. We comply with applicable health and safety laws and regulations in the areas in which we operate, as well as with our internal health and safety requirements and procedures. We are committed to ensuring that any risks of accidents, injuries, or health impacts identified by our employees, contractors, or suppliers are promptly addressed and remediated.

Child Labour

Formative Pharma prohibits the use of child labour in both our operations and supply chain. We prohibit the hiring of any individual under the age of 15. We require the age of our employees to be verified at the time of hiring. We set clear expectations for our contractors and suppliers not to use child labour, which are further detailed in our Sustainable Sourcing Policy.

All Formative Pharma employees are required to immediately report any known or suspected incidents of child labour without fear of retaliation. We maintain a strict no-retaliation policy to protect any person making an allegation in good faith. We similarly expect our contractors and suppliers to provide their employees with whistleblowing mechanisms where grievances related to child labour can be received, logged, and addressed confidentially.

Forced or Compulsory Labour

The Forced Labour Convention is one of eight fundamental conventions of the International Labour Organization ("ILO"). Its purpose is to suppress the use of forced labour in all forms irrespective of the nature of the work or the sector of activity in which the work may be performed. The ILO Forced Labour Convention defines "forced labour" as: "All work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily."

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The ILO Indicators of Forced Labour were established to assist with the identification of persons who are possibly trapped in a forced labour situation and who may require urgent assistance. The 11 indicators are as follows:

1. Abuse of vulnerability
2. Deception
3. Restriction of movement
4. Isolation
5. Physical and sexual violence
6. Intimidation and threats
7. Retention of identify documents
8. Withholding of wages
9. Debt bondage
10. Abusive working and living conditions
11. Excessive overtime

Formative Pharma rejects and prohibits the use of all forms of forced or compulsory labour, including prison labour, indentured labour, bonded labour, military labour, modern forms of slavery, and any form of human trafficking. All employment decisions must be based on free choice and no employee may be coerced to work or subjected to punishment or threats of violence or abuse as a means of discipline or control. All employment agreements must be freely agreed to, in writing, by the employee and their employer. We set clear expectations for our contractors and suppliers not to use any form of forced or compulsory labour, which are further detailed in our Sustainable Sourcing Policy.

All Formative Pharma employees are required to immediately report any known or suspected incidents of forced or compulsory labour without fear of retaliation. We maintain a strict no-retaliation policy to protect any person making an allegation in good faith. We similarly expect our contractors and suppliers to provide their employees with whistleblowing mechanisms where grievances related to forced or compulsory labour can be received, logged, and addressed confidentially.

Fair Wages

The Global Living Wage Coalition (“GWLC”) defines a “Living Wage” as: “The remuneration received for a standard workweek by a worker in a particular place sufficient to afford a decent standard of living for the worker and her or his family. Elements of a decent standard of living include food, water, housing, education, health care, transportation, clothing, and other essential needs including provision of unexpected events.”

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At Formative Pharma, we believe that all our employees, contractors, and suppliers are entitled to be paid a Living Wage sufficient to afford a decent standard of living and are committed to providing a Living Wage and equitable benefits for our employees, contractors, and suppliers and their families.

All wages paid to employees must meet or exceed the legal minimum wage. Overtime, if applicable, must be compensated at the appropriate minimum rate required by applicable law and all wages must be paid on time and in full. All employees must receive a statement of pay for each pay period that clearly outlines the components of their compensation, including hours worked, benefits received, and any deductions. We prohibit the deduction of wages as a disciplinary measure and require that all deductions be made in accordance with applicable law.

Guidance and Reporting for Employees

Any employee of Formative Pharma who believes a conflict arises between the language of this Policy and the applicable laws, customs, and practices of the place in which they work, or who has questions regarding this Policy, or would like to confidentially report a potential violation of this Policy, should raise those questions and concerns to their direct manager for escalation.

DocuSigned by:


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Lee Mangubat
President & CEO

Date: 6/14/2023
