

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



Sustainable Sourcing Policy

Mission Statement

Fostering an environment of environmental and social responsibility is fundamental to Formative Pharma's core principles of trust, integrity, and compassion. To that end, we preferentially partner with suppliers whose business practices are compatible with our policies and commitments regarding environmental and social performance. We recognize the significant impact that our work can have on communities and the environment. Our sustainable procurement system considers the core principles of environmental protection, social responsibility, and good governance to promote sustainability within our supply chain. Consistent with the International Organization for Standardization ("ISO") 20400 guidance for sustainable procurement, we are committed to working closely with our key suppliers to monitor environmental, social, and economic risks, and seek opportunities for improvement in resource consumption, efficiency, and productivity. We expect our suppliers to engage with us on this journey, and to share relevant information and data with us, to the extent reasonable and practicable.

Purpose

The purpose of this Sustainable Sourcing Policy (the "Policy") is to outline Formative Pharma's commitment to preferentially procuring goods and services from organizations that follow good international industry practice (GIIP) with regards to environmental and social performance.

Application and Review

This Policy applies to all suppliers that provide services, or goods / products that are being manufactured, processed, handled, or transported on behalf of Formative Pharma.

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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Ethics

Formative Pharma's suppliers are expected to conduct their business responsibly, ethically, and act with integrity. Suppliers are expected to comply with all relevant and applicable international and domestic environmental, labour, health & safety, and human rights legislation, including but not limited to anti-trust laws to foster fair and vigorous competition. All forms of corruption, bribery, extortion, and embezzlement are prohibited. Suppliers are expected to be able to demonstrate the existence of procedures to prevent corruption, bribery, and conflicts of interest.

Suppliers are expected to safeguard confidential information to ensure that Formative Pharma, worker, and any patient privacy rights are protected. Suppliers are encouraged to implement adequate procedures and management systems to protect and prevent unlawful use of confidential information. Suppliers are expected to comply with applicable and relevant privacy and data protection laws.

To the extent applicable to work completed by a supplier on behalf of the Company, animals are to be treated humanely with pain and stress minimized. Animal testing should be performed after consideration to replace animals, to reduce the number of animals used, or to refine procedures to minimize distress. Alternatives should be used when scientifically valid and acceptable to regulators.

Human Rights

Formative Pharma's suppliers are expected to uphold the human rights of workers and ensure that they are treated with respect and dignity. Suppliers should not use any form of forced or compulsory labour, including prison labour, bonded labour, indentured labour, child labour, or any form of human trafficking. Suppliers must comply with all applicable labour laws including adhering to the minimum legal age of employment. Furthermore, suppliers are expected to provide a workplace that is free of harassment and discrimination. We expect our suppliers to provide their employees with whistleblowing mechanisms where grievances related to labour rights can be received, logged, and addressed confidentially.

Formative Pharma believes that workers are entitled to a "Living Wage" defined by the Global Living Wage Coalition ("GWLC") 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." Formative Pharma's suppliers are expected to

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be able to evidence commitment to providing a Living Wage to all their direct workers. Suppliers are expected to pay workers in accordance with applicable wage laws, including wages that meet or exceed the legal minimum wage, overtime hours, and mandated benefits.

Health, Safety, and the Environment

The health and safety of workers is a priority for Formative Pharma. Suppliers are expected to provide a safe and healthy working environment. Suppliers are to comply with all applicable health and safety laws and regulations. Suppliers are expected to implement processes and management systems to protect workers from workplace hazards including the implementation of emergency response procedures and providing safety information related to hazards in the workplace.

Formative Pharma expects that suppliers will operate in a manner that is environmentally responsible and to take reasonable steps to minimize environmental impacts. Suppliers are expected to comply with all applicable environmental regulations, obtain appropriate environmental permits, licences, and registrations, and complete mandatory reporting, to the extent required by law.

DocuSigned by:

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Lee Mangubat
President & CEO

Date: 6/14/2023