



Aimmune's Universal Human and Labor Rights Policy

Version 1

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PURPOSE

Aimmune’s Human and Labor Rights Policy Commitment

Aimmune’s Universal Human Rights and Labor Policy outlines the foundation of human and labor rights commitments, responsibilities, and expectations of all employees of Aimmune Therapeutics Inc., its subsidiaries, and affiliates (collectively referred to as “Aimmune”), as well as contractors and temporary employees (collectively “Aimmune Personnel”) and as appropriate, external agencies who act on behalf of Aimmune.

Reviewed and approved by Aimmune’s Board of Directors and Corporate Compliance Committee, this policy outlines the framework for the development of Aimmune’s policies, procedures, trainings, and communications needed to ensure appropriate implementation of human and labor rights protective measures throughout our organization. This Policy has been made available to the general public on Aimmune’s website: www.aimmune.com and has been communicated internally to Aimmune Personnel via corporate communications, trainings, and Aimmune’s internal intranet site.



Aimmune is committed to the protection of universal human and labor rights, and remediation of any violations in accordance with:

- The International Bill of Human Rights – Universal Declaration of Human Rights – adopted by the General Assembly of the United Nations in 1948
- The Organization for Economic Cooperation and Development (OECD) Declaration on International Investment and Multinational Enterprises, “Guidelines for Multinational Enterprises: Recommendations for Responsible Conduct in a Global Context” – adopted in 1976
- International Labor Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work and its Follow-up – adopted by the International Labor Conference in 1998
- The Ten Principles of the United Nations Global Compact – world largest corporate sustainability initiative that provides a framework for developing a more sustainable and responsible business – The UN Global Compact was launched in 2000
- The United Nations Guiding Principles on Business and Human Rights – Implementing the United Nations “Protect, Respect and Remedy” Framework – endorsed by the United Nations Human Rights Council in 2011

Conducting business with the highest standards of ethical conduct and integrity, Aimmune’s employment practices, global operations, supply chain, and third-party interactions are rooted in responsible and sustainable business practices aimed at safeguarding our people, patients, process, and purpose. With Aimmune’s steadfast mission to improve the lives of patients with food allergies, we also understand we have an equally fundamental responsibility to our employees, the public, our community, and the world to preserve, protect, and respect universal human and labor rights in connection with our business practices and global operations.

SCOPE

This Policy applies to all employees of Aimmune, its subsidiaries and affiliates, as well as all contractors and temporary employees (collectively "Aimmune Personnel"), and, as appropriate, external agencies who act on behalf of Aimmune, its subsidiaries, or affiliates.

POLICY

1.0 Respecting and Protecting Human and Labor Rights at Aimmune

1.1 Human Rights

Aimmune’s business practices support and respect the protection of internationally recognized human rights including but not limited to:

- harassment, discrimination and retaliation prevention
 - Aimmune policy prohibits intentional and unintentional harassment and discrimination of any individual by another person on the basis of any protected classification under applicable federal, state, or local law, including, but not



limited to actual or perceived race, color, national origin, ancestry, sex (which includes pregnancy, childbirth, breastfeeding and medical conditions related to pregnancy, childbirth or breastfeeding), gender, gender identity, and gender expression, religious creed, disability (mental and physical) including HIV and AIDS), medical condition (cancer and genetic characteristics), genetic information, age, marital status, sexual orientation, military and veteran status and denial of family and medical care leave or any other characteristic protected by federal, state, regional or local law.

- Aimmune policy expressly prohibits retaliation against any employee for making a good-faith report of suspected misconduct or improper behavior. Anyone, regardless of position or title, whom Aimmune determines has engaged in conduct that violates this anti-retaliation policy will be subject to disciplinary action(s) up to and including termination of employment.
- Fair treatment and the prevention of abusive conduct, torture or cruel, inhuman or degrading treatment and/or punishments.
- Mandatory and recurring sexual harassment and abusive conduct trainings.
- Supporting diversity, inclusion, and equality with respect to recruitment, hiring, placement, promotion, transfer, training, compensation, benefits, employee activities and general treatment during employment.
- Ensuring that we are not complicit in human rights abuses by seeking to prevent or mitigate adverse human rights impacts/risks that may be directly linked to our business functions and global operations via the activities of our business partners.
- Supporting vulnerable and underserved communities and geographic locations in which Aimmune operates via corporate giving initiatives.
 - All charitable contributions shall be made without any agreement or expectation of any benefits, consideration, or services to Aimmune or Aimmune Personnel in return for Aimmune's corporate giving support.

1.2 Labor Rights

Aimmune is committed to:

- the right to favorable work conditions and freedom of choice concerning employment.
- protecting the health and safety of all Aimmune personnel by providing, as well as engaging with business partners who prioritize, clean and safe working conditions.
- equal opportunity employment – elimination of employment and/or occupation discrimination.
- the right to equal pay for equal work as well as just and favorable compensation in accordance with applicable employment and compensation laws.



- Aimmune embraces a total compensation philosophy to attract, motivate and retain employees with a willingness to engage themselves in Aimmune's mission, vision and values.
- providing meal periods, rest breaks, paid holidays, vacation time, and additional benefits in accordance with the rules and regulations of the countries in which we operate.
- the freedom of association and the effective recognition of the right to collective bargaining.
 - Aimmune personnel have the right and freedom to peaceful assembly and association. No one may be forced to join or refrain from belonging to an association, union or organization.
- the elimination of all forms of forced and/or compulsory labor, slavery, servitude, debt bondage and human trafficking.
- the effective abolition of child labor.
- zero tolerance policy for any form of workplace violence or harassment.

1.3 Supply Chain

Aimmune has defined specific human and labor rights guidelines and expectations for supplier and vendor business relationships in Aimmune's Vendor and Supplier Code of Conduct.

1.4 Anti-Corruption

As outlined in Aimmune's Global Anti-Corruption Compliance Policy, integrity is at the core of everything we do and that includes our relationships with government agencies and other businesses, both inside and outside of the United States. Aimmune is committed to preventing bribery and extortion as well as complying with the various anti-corruption laws that apply to our operations around the world. These laws include the U.S. Foreign Corrupt Practices Act in the U.S., the U.K. Bribery Act of 2010, and the applicable laws of all countries in which Aimmune does business.

Aimmune is committed to doing business fairly, honestly, and openly and to competing lawfully and ethically in the marketplace. Aimmune expects every director, officer, employee, agent, and third party acting on behalf of Aimmune to conduct all aspects of its business with the same commitment to integrity, regardless of the existence of any inconsistent or contrary local custom, practice, or tradition.

2.0 Human and Labor Rights Due Diligence

The primary purpose of Aimmune's human and labor rights due diligence process is to identify, prevent, mitigate, and account for how we address adverse human rights risks/impacts. Our human and labor rights due diligence process involves:

- ongoing human and labor rights impact/risk assessments



- communication and engagement of affected stakeholders to gain a better understanding of their concerns
- addressing potential and actual human and labor rights impact/risk findings
- implementing and documenting preventative, mitigative and corrective measures, as appropriate, to remedy adverse impacts
- tracking effectiveness of preventative, mitigative and corrective human and labor rights measures – via quantitative and qualitative indicators, including feedback from internal and external sources, as well as affected stakeholders
 - Evaluation of internal reporting processes, including performance reviews, surveys, audits and Aimmune's anonymous compliance violation hotline reports
- oversight, budget allocations and support from executive management
- external due diligence communications and reporting

3.0 Remediation

In the event Aimmune identifies that we have caused or contributed to an adverse human and/or labor rights impact/risk, we will immediately initiate the following steps:

- conduct a thorough investigation
- develop a remediation plan
- communicate with affected stakeholders to understand concerns and provide access to remedies – utilizing Aimmune's compliance hotline and online reporting tool as needed
- implement remediation plan and track plan effectiveness
- document remediation process and communicate efforts internally and external as deemed appropriate by executive management.

4.0 Aimmune's Operational-Level Grievance Mechanisms

As part of Aimmune's corporate compliance disclosure program, we have implemented an effective anonymous compliance hotline and online reporting service, hosted by an independent third-party reporting service – Navex Global. Aimmune Personnel must promptly report any suspected violations of Aimmune's Code of Business Conduct and Ethics, policies, procedures, laws, regulations and/or ethical standards, including but not limited to human and labor rights violations. Aimmune policy expressly prohibits retaliation against Aimmune personnel for making a good-faith report of suspected misconduct or improper behavior.

Aimmune takes all comments, concerns, and potential compliance violations seriously. All potential compliance violations will be properly investigated and, where applicable, appropriate preventative,



mitigative and corrective actions will be taken to promptly address any potential or actual human rights and/or labor violations.

Aimmune's Compliance Department oversees Aimmune's potential compliance violation disclosure program incident reporting systems. Aimmune's Compliance Officer works in conjunction with Aimmune's Corporate Compliance Committee to review and discuss reported incidents of potential compliance violations and associated investigation findings. Aimmune's Compliance Officer meets regularly with the Corporate Compliance Committee and at minimum quarterly with Aimmune's Executive Committee and Board of Directors to discuss incident reporting metrics and trends and address preventative, mitigative and/or corrective actions if needed.

Our compliance hotline and online reporting service also enables individuals to confidentially follow up on the status of their reported concerns and receive updates as to the progress and/or status of the investigation. See Section 7.0 Reporting Concerns for specific instructions on how to report a potential human and/or labor rights violation.

5.0 Policy Communication and Training Initiatives

As outlined above in Aimmune's Human and Labor Rights Policy Commitment, this policy outlines the framework for the development of Aimmune's policies, procedures, trainings, and communications needed to ensure appropriate implementation of human and labor rights protective measures throughout our organization. This Policy has been made available to the general public on Aimmune's website: www.aimmune.com and has been communicated internally to Aimmune Personnel via corporate communications, trainings, and Aimmune's internal intranet site.

Communication and training efforts of Aimmune's Human and Labor Rights policies and procedures are ongoing and updated to reflect any due diligence findings and/or identified human right impacts/risks. We are committed to promoting awareness of, and compliance with, this policy, Aimmune's Code of Business Conduct and Ethics, and any associated policies and procedures.

Additionally, we continue to publicize and encourage the use of Aimmune's Corporate Compliance Disclosure Program for reporting potential compliance violations, with multiple reporting options, including an anonymous hotline and online reporting service hosted by an independent third party. Our disclosure program emphasizes clear anti-retaliation messaging to encourage open communication, trust, and transparency.

6.0 Compliance and Disciplinary Action

Aimmune Personnel in violation of this and/or any Aimmune policy, Code of Business Conduct and Ethics, and procedures, as well as applicable laws and regulations, may be subject to disciplinary action(s) up to and including termination of employment.

7.0 Reporting Concerns

Aimmune Personnel must promptly report any suspected violations of Aimmune's Code of Business Conduct and Ethics, policies, procedures, laws, regulations and/or ethical standards. Aimmune policy expressly prohibits retaliation against any employee for making a good-faith report of suspected misconduct or improper behavior.



If you have a concern about a potential compliance violation, please come forward and discuss it with your supervisor, Aimmune management or the Compliance Department. If you prefer to remain anonymous, please contact Aimmune's Compliance Hotline, hosted by Navex Global, an independent reporting service, at the numbers and/or website listed below.

Aimmune's Anonymous Compliance Hotline & Online Reporting Service*	
For calls within the United States:	(844) 255-1758
For calls within Germany:	0800 1830892
For calls within the United Kingdom and Northern Ireland:	From an outside line dial the direct access number for your location: 0-800-89-0011 At the English prompt dial (844) 255-1758
For online reporting:	www.aimmune.ethicspoint.com

* For dialing instructions from additional global locations, please check www.aimmune.ethicspoint.com for the most up-to-date information.

Aimmune takes your comments and concerns seriously, and all potential compliance violations will be properly investigated. Thank you for your commitment to operating with integrity and fostering an ethical environment and culture at Aimmune.

REFERENCE AND RELATED DOCUMENTS

8.0 Internal Documents

- 8.1 Aimmune's Employee Handbooks
- 8.2 Aimmune Therapeutics, Inc. Code of Business Conduct and Ethics
- 8.3 Aimmune's Vendor and Supplier Code of Conduct
- 8.4 Global Anti-Corruption Compliance Policy
- 8.5 Harassment, Discrimination and Retaliation Policy



9.0 External Resources

- 9.1 [The International Bill of Human Rights – Universal Declaration of Human Rights](#)
- 9.2 [The Organization for Economic Cooperation and Development \(OECD\) Declaration on International Investment and Multinational Enterprises, “Guidelines for Multinational Enterprises: Recommendations for Responsible Conduct in a Global Context](#)
- 9.3 [International Labor Organization’s \(ILO\) Declaration on Fundamental Principles and Rights at Work and its Follow-up](#)
- 9.4 [The Ten Principles of the United Nations Global Compact – world largest corporate sustainability initiative that provides a framework for developing a more sustainable and responsible business](#)
- 9.5 [The United Nations Guiding Principles on Business and Human Rights – Implementing the United Nations “Protect, Respect and Remedy” Framework](#)