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<b>Title:</b>	<b>Human Rights</b>		

## 1. PURPOSE

- 1.1 This purpose of this Policy is to memorialize the commitment of Provention Bio, Inc. ("Provention") to protect human rights. Provention supports and is committed to complying with the United Nations Universal Declaration of Human Rights and all human rights laws and regulations that are applicable to its business operations.
- 1.2 This Policy includes, but is not limited to, Provention’s guidance for complying with the anti-trafficking provisions of Federal Acquisition Regulations (FAR) 52.222-50 “Combatting Trafficking in Persons.”

## 2. SCOPE

- 2.1 This policy applies to all Provention personnel, including employees and consultants, as well as to any vendors, subcontractors and any others who may act on Provention’s behalf in any country, worldwide (collectively, “Personnel”).
- 2.2 Violations of this policy may result in disciplinary action up to and including termination of employment (for employees) and of contracts (for other Personnel).
- 2.3 This Policy shall be distributed to all Personnel and posted on Provention’s website in accordance with FAR 52.222-50.

## 3. GENERAL REQUIREMENTS

### 3.1 Human Trafficking

- 3.1.1 Provention is committed to treating all employees and third parties with whom we interact with dignity and respect. We oppose all forms of slavery, servitude, forced labor and human trafficking. Provention prohibits modern slavery in its operations, in its supply chain, and by its business partners around the world.

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3.1.2 As an organization that pursues contracts with the US Government, Provention periodically notifies its Personnel of the Government’s zero tolerance policy regarding human trafficking.

3.1.3 Some examples of trafficking-related activities explicitly prohibited by the United States Government include: (i) engaging in severe forms of trafficking in persons, such as sex trafficking or the use of force, fraud or coercion to subject someone to involuntary servitude, peonage, debt bondage or slavery, (ii) procurement of commercial sex acts, (iii) using forced labor, (iv) using misleading or fraudulent recruitment practices, (v) using recruiters that do not comply with labor laws, (vi) charging employees recruitment fees, (vii) destroying or otherwise denying access to an employee’s identity or immigration documents; and (viii) if required by law or contract, failing to provide an employment contract, recruitment agreement or other required work document in writing. Additional information is available by visiting the website of the US State Department’s Office to Monitor and Combat Trafficking in Persons at <https://www.state.gov/bureaus-offices/under-secretary-for-civilian-security-democracy-and-human-rights/office-to-monitor-and-combat-trafficking-in-persons/>.

3.1.4 Provention strictly prohibits all Personnel from engaging in any form of human trafficking, including but not limited to those listed above. Failure to respect anti-trafficking FAR provisions and this Policy may result in significant consequences including: (1) Provention being barred from government contracts, and (2) Provention Personnel incurring disciplinary action up to and including termination.

3.1.5 Provention also complies with all applicable laws regarding the employment of minors. Provention does not tolerate any form of exploitative child labor.

**3.2 Diversity and Non-Discrimination**

3.2.1 Provention is committed to the protection of the rights of women and minority groups in all aspects of its business activities.

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3.2.2 Provention is committed to providing equal employment opportunities and complies with all applicable laws that prohibit employment discrimination on the basis of age, sex, gender (including pregnancy), race, color, disability, genetic information, national origin, sexual orientation, gender identity, religion, military or veteran status, or any other legally protected characteristic. All of our employment decisions are covered by this commitment, including recruiting, hiring, training, promotions, pay practices, benefits, disciplinary actions, and terminations.

3.2.3 Provention is committed to attaining diverse representation at the Board of Directors, senior management and workforce level. This commitment extends to, but is not limited to, ensuring appropriate representation of women and members of minority populations.

### 3.3 Occupational Health and Safety

3.3.1 Provention is committed to providing a safe and healthy workplace and complies with applicable safety and health laws, regulations, and policies. We are dedicated to minimizing the risk of accidents, injury and exposure to health risks. While accidents and injuries are rare (inasmuch as Personnel typically work in professional office and home-based settings), we are nevertheless committed to engaging with our employees to continually improve health and safety in our workplaces, including the identification of hazards and remediation of health and safety issues.

3.3.2 We work to ensure our workplaces are free from violence, harassment, intimidation, and other unsafe or disruptive conditions due to internal or external threats.

### 3.4 Labor Standards and Freedom of Association

3.4.1 Provention maintains labor standards including hours, conditions, wages, and overtime pay practices that comply with the laws of the jurisdictions in which we operate. Provention provides compensation packages (including base salaries,

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medical and other benefits, and paid time off) that are competitive for the locations in which our workforce members work.

- 3.4.2 Provention respects our employees’ freedom of association and their right to lawfully and peacefully associate, organize and bargain collectively, as permitted by applicable laws in the countries where Provention does business.

### 3.5 Supply Chain and Partners

- 3.5.1 Provention holds its suppliers, vendors and partners to each of the standards enumerated above. Our Compliance team periodically monitors these individuals and entities for compliance to this policy.
- 3.5.2 Internal and appropriate external Provention stakeholders shall be involved in the development, implementation and evaluation of outcomes of the policy, including but not limited to third-party labor suppliers.

### 3.6 Conflict Minerals

- 3.6.1 Provention complies with applicable laws wherever it operates, including laws pertaining to conflict minerals such as tantalum, tin, tungsten and gold (also known as 3TGs). Provention conducts due diligence to understand the use and source of 3TGs in our products across our complex global supply chain. Following guidelines developed by the Organization for Economic Cooperation and Development (OECD), we are identifying products and suppliers in scope, if any, and deploying standardized contract language that will require suppliers to disclose the presence and source of conflict minerals in their supply chains.
- 3.6.2 To the best of our knowledge, all within our supply chain have been verified conflict-free.

### 3.7 Training

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3.7.1 All Provention Personnel, including but not limited to those with direct responsibility for supply chain management, shall receive training on this policy within 30 days of implementation. New hires shall receive training on this policy within 30 days of hire.

### 3.8 Reporting Violations

3.8.1 Personnel who become aware of a potential violation of this policy are required to report the matter immediately. Reports may be made to the Legal/Compliance department via email at [compliance@proventionbio.com](mailto:compliance@proventionbio.com). Reports may also be made using the anonymous compliance hotline available at [www.proventionbio.ethicspoint.com](http://www.proventionbio.ethicspoint.com) or (844) 449-7503.

3.8.2 Employees may also report human trafficking concerns to the National Human Trafficking Hotline at 1-888-373-7888.

3.8.3 Provention Legal/Compliance is responsible for investigating alleged policy violations, and for overseeing the proactive monitoring of Provention worksites, subcontractors and vendors, to ensure we meet our commitment to respecting the human rights of all people in our business.

3.8.4 Provention is committed to taking appropriate corrective action in response to any violation. No retaliatory action will be taken against any Personnel for raising concerns or claims made in good faith under this Policy.

## 4. VERSION STATEMENT

4.1 This is an original Provention policy. There are no prior versions of this policy.

## 5. REFERENCES/RELATED DOCUMENTS

5.1 Federal Acquisition Regulations (FAR) 52.222-50 “Combatting Trafficking in Persons” available at <https://www.acquisition.gov/far/52.222-50>.

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- 5.2 State Department’s Office to Monitor and Combat Trafficking in Persons at <https://www.state.gov/bureaus-offices/under-secretary-for-civilian-security-democracy-and-human-rights/office-to-monitor-and-combat-trafficking-in-persons/>.
- 5.3 United Nations Universal Declaration of Human Rights available at <https://www.un.org/en/about-us/universal-d>.

## 6. DOCUMENT HISTORY

#	Date	Version #	Revised By	Description of Changes