



Commitment to Corporate Responsibility

2024 ESG Report

Axsome's corporate responsibility is fundamental to our long-term success. We have a commitment to environmental, social, and governance ("ESG") issues. The Nominating and Corporate Governance Committee of our Board of Directors oversees management's engagement on ESG matters.

Our Commitment to the Environment

We consider how our activities impact not only patients, employees, and investors, but also our global community as a whole. We are stewards of the environment by ensuring that we conserve and utilize resources consistent with the applicable laws and regulations. Further, we strive to minimize and, if possible, eliminate the use of substances that cause environmental damage. We initiate and implement initiatives to reduce resource consumption, waste generation, and environmental pollution and to address global warming and climate change. For example, we selected One World Trade Center, a LEED® Gold certified building, for our corporate and executive offices, use energy efficient lighting in our offices, and cool our office space with a chiller plant harnessing cold water from New York's Hudson River. Likewise, we estimate that nearly 30% of the electricity used in our business comes from renewable sources. We strive to use environmentally friendly materials in our business, and we encourage all employees to participate actively in our onsite recycling program. To date, we have not been engaged in any legal proceedings relating to our alleged non-compliance with environmental laws.

Global Warming & Climate Change

We operate our facilities in an environmentally sound manner and carefully consider each of our material vendor's environmental practices as part of our evaluation process. We seek to ensure that our products are developed and manufactured in a manner which minimizes greenhouse gas impact. In addition, our adoption of a hybrid remote work policy enables our employees to further reduce the environmental impact of their commutes. As with all ESG matters, the Nominating and Corporate Governance Committee of our Board of Directors oversees management's response to climate change related risks and opportunities.

Material Waste

We recycle waste generated at our facilities to the extent permitted by local conditions. Where feasible, we procure and use eco-conscious and compostable or reusable kitchen and office supplies. We encourage the suppliers who manufacture and package our products to minimize waste in connection with these processes pursuant to the Supplier Management policy described below.

Water Usage

We seek to minimize water usage throughout our business. None of our operations are located within water stressed areas.

Supplier Management

We expect our suppliers to follow all applicable environmental laws, regulations and standards. This includes, where applicable, requirements for chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits and environmental reporting. Suppliers should have their own environmental management system, as feasible, including quantifiable goals to reduce environmental impact and greenhouse gas emissions, and minimize waste, energy consumption and the use of materials of concern as well as adopt measures and controls, including audits, reporting and training. Suppliers should, wherever possible, support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility, and encourage the diffusion of environmentally preferable technologies implementing sound life-cycle practices. We are not aware of any violations of our environmental expectations by our suppliers.

Our Commitment to Social Responsibility

Our commitment to social responsibility extends to both our employees and the communities we serve.

We provide our employees with competitive salaries and bonuses, opportunities for equity ownership, development programs that enable continued learning and growth and a robust employment package that promotes well-being across all aspects of their lives. In addition to salaries, these programs include potential annual discretionary bonuses for our non-sales staff, potential quarterly incentive compensation for our sales staff, stock awards, a 401(k) plan which includes employer contributions, healthcare and insurance benefits, health savings and flexible spending accounts, paid time off, family leave/dependent care, and flexible work schedules to accommodate work-life balance, among other benefits. As of the date of this report, substantially all of our employees are permanent full-time employees and are eligible for each of these benefits.

We serve the communities where we operate and the broader global community through company policies and processes which ensure that we make positive impacts, big and small, every day. Examples include policies regarding our respect for human rights, conducting robust and transparent clinical trials, developing our drugs with due consideration for animal welfare, ensuring broad access to our drugs, engaging in ethical marketing, and ensuring that our participation in the political process is conducted in an ethical and compliant manner.

Employee Training

We are committed to employee growth and development, and regularly evaluate the need for learning throughout our organization. We support growth and development in a variety of ways, including through a seminar program of visiting speakers, in-house training programs, and recurrent structured employee/manager check-ins to discuss career development goals and success. Additional opportunities are available to employees, including opportunities to attend external conferences or receive training. We encourage ongoing feedback, improvement, and growth for our employees.

Employee Diversity

We are also committed to building a diverse workforce, including hiring for diversity of thought, background and experience, and diversity of personal characteristics such as gender identity, sexual orientation, race, ethnicity, faith, disability, veteran and LGBTQ+ status. It starts at the top, where 40% of the members of our Board identify as a member of an underrepresented racial minority group (those self-identifying as African American, Hispanic or Latino, Asian, or being two or more races or ethnicities), including our CEO. We believe that a diverse workforce not only positively impacts our performance and strengthens our culture, but it also cultivates an essential pipeline of experienced leaders for management. As of March 27, 2024, women make up approximately 53.4% of our global workforce and constitute approximately 36.4% of management. As of March 27, 2024, employees who identify as a member of an underrepresented racial minority group make up approximately 26.4% of our global workforce and approximately 36.4% of management (4% of our employees declined to self-identify, or otherwise did not provide us with this information).

Employee Engagement

We systematically track employee engagement through our 360-degree review process and through other defined and recurrent human resources processes. We use this feedback to ensure that we maintain our position as an employer of choice within the life sciences industry.

Employee Safety

We strive to create a safe workplace for all of our employees. We provide mandatory safety training for employees operating company-owned motor vehicles and regularly undertake both internal and external inspections of our office space for safety hazards. For the calendar year 2023, we had zero OSHA-reportable employee injuries

Human Rights

We respect human rights through our engagements with patients, our employees, our suppliers and the communities in which we live and operate. We align our approach on human rights with the UN Guiding Principles on Business and Human Rights. This includes our commitment to respecting the rights contained in the Universal Declaration of Human Rights and the Fundamental Principles and Rights at Work set out by the International Labour Organisation. This commitment extends to respecting women's rights throughout the world.

As a purchaser of goods and services, we strive to conduct business with third-party suppliers, business partners and collaborators who share our commitment to high ethical standards and operate in a responsible and ethical manner towards their workers and their own suppliers.

We protect the rights, dignity and safety of people using our products, both during and after the product's development. We monitor the safety of our products to protect patients' wellbeing. We are committed to ensuring that the human rights of people taking part in our clinical research are protected, including through the informed consent process and procedures to protect patient privacy. We are committed to patient-centered promotional practices which are ethical, responsible and principled. As a marketer of pharmaceutical products, we strive to make them as widely available as possible, while running our business in a sustainable way.

As an employer we are:

- Committed to providing a fair salary and good conditions of employment
- Committed to providing a healthy, safe, and secure workplace for all employees and contractors
- Committed to exercising high standards of integrity in dealing with and protecting the Personally Identifiable Information (PII) of employees
- Committed to prohibiting discrimination at work and to promoting diversity and inclusion
- Committed to promoting the personal development and dignity of every individual employee
- Respectful of the right of employees to join an independent trade union, the right to collectively bargain, and of freedom of association
- Committed to eradicating all forms of forced labor and prohibiting all forms of slavery and exploitative child labor and will work with appropriate partners to address this problem responsibly wherever we encounter it

Clinical Trial Policy

We are deeply committed to ensuring that our clinical research is conducted responsibly and transparently, in full compliance with applicable laws and regulations, while protecting patient data. We are proud to have dedicated and trained staff to ensure timely registration of clinical trials and communication of our research results, and we work closely with external experts and thought leaders to ensure our work reflects the latest clinical and scientific advances.

Our current practices include:

- **Data Privacy** – As guardians of data about the patients who use our medicines, as well as their caregivers and the healthcare professionals who serve them, we are committed to handling personal data in accordance with global laws and regulations that govern data protection and privacy
- **Clinical Trial Registration** – We register company-sponsored clinical trials on public clinical registry sites as required by global laws and regulations
- **Clinical Trial Results** – We disclose company-sponsored clinical trial results on public registries in compliance with global results disclosure laws and regulations

Animal Welfare

We are science-driven organization committed to developing novel therapies for central nervous system (CNS) conditions that have limited treatment options. Over time, progress has been made to reduce the use of animals in medical research, but animal studies remain an essential requirement for this important work. Animal welfare is always a priority, and this includes a commitment to Replacement, Reduction and Refinement of animals in research (the 3Rs):

- **Replacement** – Accelerating the development and use of models and tools, based on the latest science and technologies, to address important scientific questions without the use of animals
- **Reduction** – Appropriately designed and analyzed animal studies that are robust and reproducible, and truly add to the knowledge base
- **Refinement** – Advancing animal welfare by using the latest in vivo technologies and improving understanding of the impact of welfare on scientific outcomes

Ensuring Access to Our Drugs

We are committed to ensuring broad access to the medications which we manufacture. We operate patient assistance programs for our products which provide free drug to qualifying patients for whom affordability is a concern. Likewise, we operate co-pay assistance programs to reduce financial burden for insured patients.

Product Safety

We are a patient-focused company committed to producing products of the highest quality. Our products are manufactured to international Good Manufacturing Practices (“GMP”) standards as we confirm through our vendor quality audit program. Likewise, we operate a comprehensive pharmacovigilance program fully in compliance with global regulatory standards. We serialize our products and sell them only to reputable and carefully vetted wholesalers to reduce the risk of counterfeiting. To date, we have not recalled any product from the market.

Ethical Marketing

We market our products in an ethical manner. We provide fair balance in all of our marketing materials, and our policies strictly prohibit off-label marketing, pre-approval marketing or the making of unsubstantiated product claims. Any third party engaged by us to market our products is held to these same high standards. Our engagements with the public and patient advocacy groups are all subject to the company’s Healthcare Compliance policies. We have not received any notice of any violation of any regulatory, labeling or marketing codes or paid any costs associated with allegations of false, deceptive or unfair marketing practices.

Participation in Political Process

We may, from time to time, participate in industry efforts to educate lawmakers regarding matters of concern to the biotechnology industry, and to advocate for policies which we believe will improve public health. We do not make donations to individual political candidates. In all cases we strictly comply with all applicable laws regarding our conduct in this regard.

Our Commitment to Ethics and Corporate Governance

We aspire to maintain the highest ethical standards. All of our employees are required to adhere to our Code of Business Conduct and Ethics, which provides, among other things, that all of our employees, officers and directors must (i) act with integrity and observe the highest ethical standards of business conduct in his or her dealings with our customers, suppliers, partners, service providers, competitors, employees and anyone else with whom he or she has contact in the course of performing his or her job, and (ii) conduct relationships with colleagues and business relationships with competitors, suppliers and customers free of any discrimination, including based on race, color, creed, religion, age, gender identity, sexual orientation, national origin, marital status, veteran status, handicap or disability. A copy of our most recent Code of Business Conduct and Ethics (last updated February 9, 2024) may be found [here](#).

Healthcare Compliance

We also operate a robust healthcare compliance program with a team of full-time dedicated professionals who are tasked with managing risks associated with our interactions with healthcare providers. In addition to dedicated personnel, key aspects of our comprehensive approach to healthcare compliance include:

- A full set of written healthcare compliance policies consistent with, among other things, the PhRMA Code, and validated by best-in-class external consultants
- Mandatory and recurrent healthcare compliance training for all sales personnel with certification exams to confirm learning outcomes
- Continuous field and headquarters-based monitoring of commercial personnel's interactions with healthcare providers
- An external hotline for anonymously reporting healthcare compliance concerns

Likewise, we manage risks associated with marketing communications through a formal Promotional Review Committee ("PRC") process. As part of our PRC process, all prospective marketing materials are reviewed by representatives from our Medical, Legal, and Regulatory teams prior to being approved for external distribution. All materials are reviewed to ensure fair balance, adequate substantiation, and compliance with law.

We are committed to transparency in our interactions with healthcare providers. In the United States, we publicly disclose transfers of value to healthcare providers through CMS's Open Payments portal.