



Supplier Standards of Conduct

This Supplier Standards of Conduct applies to our suppliers and vendors of goods and services (hereinafter collectively referred to as “Suppliers”). It outlines the primary principles and expectations that Axsome expects from its Suppliers.

We recognize that our Suppliers might operate in different legal and cultural environments, and should adherence to this Policy violate local law or collective bargaining agreements or make it unreasonably challenging for it to implement this Policy, Suppliers should comply with local requirements while respecting the underlying principles in this Policy and/or reach out to us to develop an appropriate plan.

If any of our Suppliers developed their own standards or policies, we expect that they ensure that their own policies are consistent with this Policy.

1. Human Rights

We along with our Suppliers must respect internationally recognized human rights and comply with all applicable laws on this matter. Our Suppliers are expected to adhere to internationally recognized human rights, such as the Universal Declaration of Human Rights, International Bill of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the principles concerning fundamental rights set out in the ILO’s Declaration on Fundamental Principles and Rights at Work. We strongly encourage our Suppliers to conduct due diligence on human rights.

2. Labor Practices

Employment is freely chosen

Suppliers shall not employ, use, or otherwise benefit from forced, bonded, or indentured labor, or involuntary prison labor. No worker shall pay for a job or be denied freedom of movement.

Non-discrimination and fair treatment in employment

Suppliers shall comply with applicable laws regarding equal employment opportunities and discrimination in the workplace. The Supplier shall provide a work environment free of harassment, discrimination, violence, punitive and/or inhumane treatment, including any sexual harassment, sexual abuse, mental or physical coercion or verbal abuse of workers and no threat of any such treatment. There shall be no discrimination for reasons based on reasons such as race, color, creed, religion, age, sex, sexual preference, pregnancy, national origin, marital status, veteran status, handicap or disability, or any other protected status. Examples of illegal discrimination or harassment include derogatory comments based on any of the preceding characteristics or unwelcome sexual advances.

Wage and Benefits

Suppliers shall pay workers according to applicable laws and agreed employment contracts, including at least minimum wage, overtime hours and mandated benefits. Workers shall not have to work more than 48 hours a week on a regular basis, or 60 hours a week including overtime. Our Suppliers are encouraged to pay a fair wage to ensure a decent standard of living for their workers in their respective regions.

Suppliers are expected to communicate whether overtime is needed, shall be voluntary and shall not be demanded on a regular basis. Overtime shall always be compensated at a premium rate and workers shall be given breaks and appropriate leaves per local laws, ILO standards, collective agreements and/or industry benchmarks.

Child Labor

Suppliers must not recruit or use child labor. The minimum working age shall be fifteen or the applicable minimum legal age for employment, whichever is higher. Those above the minimum age but younger than 18 shall not be employed at night or in hazardous conditions.

Collective Bargaining

Suppliers must respect the rights of workers, as set forth in local laws, to associate freely, have the right to join or form trade unions of their own choosing and to bargain collectively. Worker representatives shall not be discriminated against and have access to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted under law, the Supplier shall facilitate and not hinder the development of parallel means for independent and free association.

3. Health and Safety

Suppliers shall comply with all applicable health and safety laws and regulations, and shall provide all workers with a safe and healthy working environment, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

Suppliers shall provide workers with regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

Safety information relating to hazardous materials shall be available to educate, train, and protect workers from hazards. Suppliers shall ensure compliance and proper monitoring of hazard information through documents such as Safety Data Sheets, and shall maintain a culture of safety.

Suppliers shall protect workers from unhealthy exposure to chemical, biological, and physical hazards. Appropriate equipment, facilities and services shall be provided to support workers safety, health, and wellbeing, including access to potable water. Accommodation, where provided, shall be clean, safe, and meet the basic needs of workers.

Suppliers shall have process safety procedures and processes in place to identify, monitor and prevent both occupational and process hazards. Suppliers shall also have actions in place to identify the risks from chemical and biological processes and to prevent the catastrophic release of chemical or biological agents.

4. Environment

Axsome is committed to protecting and respecting our environment. Suppliers are expected 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.

5. Supplier Assessments

Suppliers must demonstrate commitment to the standards set out in this Policy by allocating the appropriate resources and using appropriate systems and mechanisms to conduct due diligence in identifying and adopting risk-mitigation measures. Suppliers are expected to maintain necessary documentation that demonstrate compliance with these Standards and with applicable regulations.

Suppliers must permit Axsome to conduct regular due diligence reviews and audits, upon reasonable notice, to ensure conformance with this Policy, compliance with applicable laws, and alignment with Axsome's values and standards. Axsome maintains the right to terminate its relationship with a Supplier for violation of this Policy or if the Supplier fails to take necessary corrective actions for deficiencies identified by internal or external assessments within agreed upon timeframes.