

Human Rights Policy

Moldgenix, LLC. recognizes the importance of protecting and advocating for human rights as our employees Moldgenix, LLC. are our most valued asset. We are committed to ethical business practices including fair and impartial treatment of all persons regarding wages and benefits, working conditions, global labor and anti-corruption laws, and the preservation of applicable environmental standards. We strive to provide a safe, secure, and healthy environment for our employees, vendors, and customers and align our policies with guidance provided by the [UN Guiding Principles on Business and Human Rights](#).

Moldgenix, LLC. has a zero-tolerance philosophy against modern slavery and the deprivation of a person's liberties for personal or commercial gain. Modern slavery is a crime and a violation of fundamental human rights that takes various forms, such as slavery, servitude, forced and compulsory labor, and human trafficking. Moldgenix, LLC. is committed to eliminating acts of modern slavery from occurring within our business and will take the necessary measures to assess the effectiveness of our approach. This includes training employees who have direct responsibility for supply chain management to raise awareness and help to identify victims of modern slavery.

Moldgenix, LLC. will not do business with any company that knowingly engages in modern slavery or human trafficking. Our material suppliers contractually agree that the products they provide to Moldgenix, LLC., and the materials used to create them, were not produced from child or forced labor and comply with the local laws in which they operate.

Health & Safety

The health and safety of Moldgenix, LLC. employees and customers are vital to the health of our business. We strive to minimize injury or illness, in addition to property loss or business interruption caused by accidents, fire, or other hazards. The safer our workplace is, the more efficient and profitable our company will be.

Moldgenix, LLC. is committed to providing quality equipment, access to clean water, safe tools, and necessary protective equipment to keep employees safe. This includes providing ongoing training and the necessary resources and time required to maintain a safe place to work.

Additionally, we expect all employees to cooperate fully with our safety measures and actively participate in helping keep each other safe. All Moldgenix, LLC. employees must recognize hazards, anticipate exposures and risks, and act to eliminate or control them. Our employees are expected to communicate with each other, the Safety Director and our management team when unsafe acts are observed or if there is potential for an unsafe working environment. Through personal commitment and excellent communication, we strive to maintain a safe and productive place to work.

Commitment to Diversity, Equity, and Inclusion

Moldgenix, LLC. strives to maintain a workforce that reflects the communities we serve, where there are equitable opportunities for success for all people regardless of race, color, national origin, religion, ancestry, sex and gender (including identity/expression), military and veteran status, physical ability, medical condition, genetic information, marital or familial status, sexual orientation, age or any other category protected by federal, state or local law or because of the individual's association with a member of a protected group or connection to an organization or group related to a protected group. Moldgenix, LLC. provides equal opportunities in compliance with federal laws, including the U.S. Equal Employment Opportunity Commission laws and guidance.

We are committed to doing everything we can to ensure that all people have equal opportunities to grow, develop and achieve their dreams. We are striving to achieve pay parity, so that regardless of gender, race, or ethnicity, people are paid equally for equal work. We utilize an external third party to ensure we are making equitable decisions when it comes to pay.

Our approach to diversity, equity, and inclusion is focused on [four pillars of change](#):

1. **Educate Everyone** – Ongoing training and education for employees across all levels of the company aimed to educate, increase awareness, enhance cultural competencies, and mitigate bias.
2. **Be Accountable & Engage** – Hold ourselves accountable by tracking and reporting our [workforce demographics](#) and engaging with and supporting organizations that reflect the communities we work and live in.
3. **Recruit, Retain & Develop** - Ensure our processes to recruit, retain, and develop diverse talent at all levels of the organization are equitable and intentional.
4. **Listen & Respond to Employee Concerns** – Foster an environment where employees can voice concerns about racism, injustice, and inequality without fear of judgment or retaliation.

Hiring Practices

Moldgenix, LLC. strives to maintain adequate hiring practices. Facilities that don't have a formal hiring process are at a higher risk of using unethical practices. All hiring is completed by the Human Resources Department in accordance with Moldgenix, LLC.'s documented hiring process.

Working Hours and time off

Moldgenix, LLC. strives to maintain a 60-hour workweek maximum, including overtime in all facilities. This number may be exceeded for special projects/circumstances but will always comply with local/state/federal law. We also expect workers to receive a minimum of one full rest day after six consecutive workdays. All facilities must use an effective timekeeping system to ensure timecards are accurate and completed by the employees themselves.

Migrant Labor

All workers, including foreign and domestic migrant workers are to be provided wages, benefits and working conditions that are fair, comparable to local workers and in accordance with local law. We do not condone holding workers' passports, other personal documents, charging fees or deposits for employment, allowing labor agents or brokers to charge fees or engaging in deceptive recruitment practices.

Discipline

Moldgenix, LLC. expects that all employees are to be treated with dignity and respect. Moldgenix, LLC. will not knowingly work with vendors or factories who use physical abuse or intimidation against their workers. Any complaints regarding physical abuse or intimidation are investigated by HR/Management, disciplinary action is taken accordingly.



Code of Business Conduct & Ethics, Compliance & Training

Obeying the law is the basis on which Moldgenix, LLC.'s ethical standards are built. Relationships with customers, vendors, competitors, employees, and governmental bodies and officials must comply with all laws, rules, and regulations applicable to the conduct of Moldgenix, LLC.'s business. These include, without limitation, laws covering bribery and kickbacks, the development, testing, manufacturing, marketing and sale of our products, copyrights, trademarks and trade secrets, information privacy, insider trading, illegal political contributions, antitrust prohibitions, foreign corrupt practices, offering or receiving gratuities, environmental hazards, employment discrimination or harassment, occupational health and safety, false or misleading financial information or misuse of corporate assets.

All employees, regardless of position or rank, undergo compliance training annually and are required to acknowledge understanding and commitment to upholding our Code of Business Conduct & Ethics. Employees overseeing our supply chain also receive regular training on compliance with anti-bribery and corruption laws, alongside company policies.

Third-Party Standards of Conduct

We expect all third-party partners working for or with Moldgenix, LLC. to share our commitment to ethical business practices regarding fair wages and benefits, acceptable working conditions, adherence to global labor and anti-corruption laws, and the preservation of applicable environmental standards. All vendors, manufacturing suppliers, their sub-contractors, and their agents, are expected to conduct business with Moldgenix, LLC. as outlined below:

- **Wages and Benefits:** Those employed by vendors and manufacturers must receive benefits and be fairly compensated, on time, for all hours worked (including overtime), at rates that meet local industry standards and comply with local laws.
- **Health and Safety:** Vendors and manufacturers shall provide employees with safe, clean, and healthy working conditions throughout the facilities and in any provided living accommodations. Well-established safety procedures must be in place to reduce the risk of potential accidents and injuries, and exposure to hazardous materials and chemicals.
- **Country Labor Laws:** All vendors and manufacturers shall comply with local and country labor laws and workplace regulations of the countries in which they are located.
- **No Forced or Involuntary Labor:** Vendors and manufacturers shall not use forced or involuntary labor of any kind, including prison labor, human trafficking, slavery, debt bondage, abduction, or labor that is required as a means of political coercion, exploitation, or as punishment for holding, or for peacefully expressing political views.

- **Prohibition of Child Labor:** Vendors and manufacturers must not employ any persons under the age of 14, regardless of the law of the country where the vendor and manufacturer are located, and shall comply with all local laws regarding the employment of minors.
- **No Discrimination:** Those employed by vendors and manufacturers must not be discriminated against based on age, pregnancy, race, religion, disability, ethnicity, national origin, marital status, protected status, or any other reason impermissible with local law.
- **Prohibition of Harassment and Abuse:** Those employed by vendors and manufacturers shall not be subject to any type of corporal, mental, verbal, sexual or physical punishment, harassment, torture, or abuse.
- **Freedom of Association:** Vendors and manufacturers shall respect the rights of workers to freely join lawful organizations of their choice and bargain collectively without fear of retaliation.
- **Environmental Preservation:** Vendors and manufacturers must adhere to local laws regarding the protection and preservation of the environment and strive to incorporate sound business practices to protect the environment. All required licenses, permits, and registrations must be kept up to date.
- **Illegal Payments and Corruption:** Regardless of local custom, vendors and manufacturers will not engage in (either directly or indirectly) illegal payments or other facilitating payments, nor will it involve itself in activities or practices of questionable ethical standards, including (but not limited to) fraud, extortion, embezzlement, bribes, favors, gifts of substantial value, or gifts or loans of money to government officials.
- **Unauthorized Subcontracting:** Vendors and manufacturers will not subcontract production work for Moldgenix, LLC. without sending advance written notice of the subcontracted facility name and address to lhrycko@moldgenix.com.
- **Conflict Minerals:** Vendors and manufacturers will not source metals derived from minerals, or their derivatives, originating from conflict regions that directly or indirectly finance or benefit armed groups.

Vendors and manufacturers will be held accountable for the continuous monitoring and documenting of their compliance processes within their supply chain.



Reporting Known or Suspected Violations & Grievances

Employees shall promptly report (openly or confidentially and/or anonymously) in any of the manners described below:

- Any questionable accounting, internal accounting controls, auditing matters or questionable financial practices (an “Accounting Allegation”);
- Any possible non-compliance with applicable legal and regulatory requirements (a “Legal Allegation”);
- Any possible non-compliance with the Code of Business Conduct and Ethics (a “Code Allegation”); and
- Any alleged retaliation against employees and other persons who make, in good faith, Accounting Allegations, Legal Allegations or Code Allegations (a “Retaliatory Act”).

In addition to any other avenue available, they may, in their sole discretion, report to the President or the Office Manager any Accounting Allegation, Legal Allegation, Code Allegation or Retaliatory Act:

- In writing to Moldgenix, LLC., Attn: President, HR Manager, or Office Manager, PO Box 878, Trumbauersville, PA 18970
 - By calling 215-538-9613 during standard business hours Monday through Friday 8am - 3pm.
 - Ask to speak with either the President, Office Manager, or Office Administrator
- In writing via contact form on website www.moldgenix.com

Any report by an employee or other individual may be made openly or confidentially and/or anonymously. Employees may also report possible Code Allegations and send questions or comments to their manager, department head or Human Resources.

We are committed to providing workers, vendors, community members, and other stakeholders with access to effective grievance mechanisms. Encouraging individuals to speak up is the most effective way to ensure good working conditions and respect for human rights.