



Global Human Rights and Anti-Human Trafficking Policy

PURPOSE

Insméd is committed to upholding human rights in the workplace and will not tolerate such abuses. Insméd's commitment to human rights includes prohibiting human trafficking, such as the use of modern-day slavery in any form, forced labor and child labor. We expect all Personnel to abide by this commitment and to take appropriate steps to mitigate these risks from occurring in any aspect of our work environment, business, and supply chain. Our commitment to uphold human rights and prohibit human trafficking is consistent with our core values of respect, integrity, and conducting ourselves in an ethical, lawful manner, as supported by our Code of Business Conduct and Ethics. Insméd will not tolerate or condone violations of human rights, including human trafficking, in any part of our global organization.

Insméd respects international human rights principles. We support the principles outlined in the United Nations Universal Declaration of Human Rights, the United Nations Global Compact, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and the Japanese Guidelines on Respecting Human Rights in Responsible Supply Chains.

See also Appendix, Statement of Disclosure and Compliance with the Transparency in Supply Chain Act (CA)

SCOPE

This Global Human Rights and Anti-Human Trafficking Policy applies to all Insméd employees, temporary employees, contractors, subcontractors, vendors, suppliers, partners, and others through whom Insméd conducts business, including those engaged to provide services to Insméd subsidiaries and affiliates (collectively, "Personnel").

POLICY

Roles and Responsibilities

Insméd Personnel shall respect human rights and not engage in any practice that constitutes human trafficking, modern-day slavery, or child labor. This includes, but is not limited to, the following activities:

- Respecting the value and dignity of all our employees;
- Making decisions about hiring, promotion, compensation and all personnel actions without regard to any legally protected characteristic;
- Being an affirmative action employer;
- Encouraging our employees' development so they reach their full potential;
- Fostering a diverse, inclusive, and equitable workplace;
- Prohibiting any form unlawful harassment, discrimination, or retaliation;
- Providing a healthy and safe workplace;
- Recognizing employee privacy and freedom of association;
- Ensuring compliance with applicable labor and employment laws, including those regulating wages and hours;
- Not allowing work to be conducted by persons under the age of 18;

- Prohibiting the use of forced labor in the performance of any work;
- Not destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passport or driver's license, regardless of issuing authority;
- If required by law or contract, providing return transportation or paying for the cost of return transportation upon the end of employment;
- Not using misleading or fraudulent practices during the recruitment of employees or offering of employment/contract positions, such as failing to disclose, in a format and language understood by the employee or applicant, basic information;
- If required by law or contract, providing an employment contract, recruitment agreement, or other required work document in writing with legally required information and in a language the employee understands;
- Not making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing, any associated costs (if provided by the employer or agent), any significant cost to be charged to the employee or applicant, and, if applicable, the hazardous nature of the work;
- Only using recruiters that comply with local labor laws of the country in which the recruiting takes place;
- Not charging applicants recruitment fees; and
- If required by law or contract, providing or arranging housing that meets the host country housing and safety standards.

Procedure for Reporting Suspected Violations

The Reporting and Investigating Reports of Misconduct Policy outlines how to report issues. In accordance with the Reporting and Investigating Reports of Misconduct Policy, conduct believed to be in violation of this policy must be promptly reported verbally or in writing to (1) a supervisor or other manager including an Executive Committee member, (2) a Human Resources representative, (3) the Legal Department, (4) the Chief Compliance Officer, or any member of the Global Compliance department, or (5) the Board of Directors (via an email to the Corporate Secretary).

You also can use the Insmmed Hotline which allows you to report any concerns and violations or suspected violations confidentially 24 hours a day, 365 days a year:

Website: insmed.ethicspoint.com

Mobile site: insmedmobile.ethicspoint.com

Hotline toll-free phone number, English: +1-844-539-2347

International callers: Dial your country specific access code (available [here](#)) and, once prompted, dial the Hotline phone number: 844-539-2347





Where allowed by local law, you may choose to remain anonymous when using the Insmmed Hotline. Although you may have this option to remain anonymous, you are encouraged to identify yourself to facilitate investigation and follow-up.

Reports will be kept confidential to the extent possible, consistent with applicable law and the need to conduct an adequate investigation.

Insmmed will not tolerate retaliation against any Personnel for reporting a concern in good faith or for cooperating with an investigation.

Failure to report an actual or suspected violation of this policy may be deemed a violation of this policy.

Enforcement

The Reporting and Investigating Reports of Misconduct Policy outlines any potential disciplinary consequences.

The United States Government has a zero-tolerance policy regarding any Government employees and contractor personnel, and their agents, engaging in any form of human trafficking. Insmmed stands behind and whole-heartedly supports this zero-tolerance policy. The U.S. Government's policy prohibiting trafficking in persons is available at 48 CFR § 52.222-50. Additional information about the awareness of human trafficking may be found at the U.S. Department of State's Office to Monitor and Combat Trafficking in Persons website at www.state.gov/j/tip. Violation of the U.S. Government's policy against human trafficking may also result in criminal prosecution of responsible individuals.

In Japan, Europe, and other markets where Insmmed conducts business, there are also laws, guidelines and policies protecting against and penalizing human trafficking and child labor. Insmmed whole-heartedly supports these guidelines, policies and laws.

APPENDIX

Statement of Disclosure and Compliance with the Transparency in Supply Chain Act



Effective Date: January 31, 2023

APPENDIX

Statement of Disclosure and Compliance with the California Transparency in Supply Chain Act

The California Transparency in Supply Chains Act of 2010 requires certain retailers and manufacturers doing business in California to disclose their efforts to address slavery and human trafficking in their direct supply chains.

Insmmed is not aware of any element of slavery, child labor, or human trafficking in its business or supply chains and will work to the best of its ability to ensure it remains free of any such activity. Insmmed has taken the following actions to honor our commitment to combating modern slavery:

- **Verification:** Insmmed does not yet verify its direct supply chain to evaluate and address risks of slavery and human trafficking.
- **Audits:** Insmmed does not yet audit its suppliers to evaluate compliance with company standards prohibiting slavery and human trafficking.
- **Certification by Direct Suppliers:** Insmmed expects all suppliers to maintain the highest ethical standards when carrying out business activities. Although we do not currently require direct suppliers specifically to certify that their materials are sourced or manufactured in compliance with applicable laws on slavery and trafficking, we do require suppliers to comply with all applicable laws.
- **Internal Accountability:** Insmmed maintains Code of Business Conduct and Ethics and other policies that require Personnel to comply with all applicable laws, including those that relate to labor practices. Insmmed will take appropriate action if it determines that Personnel has violated a company standard or law, including those relating to slavery or forced labor. We will also take appropriate action if it is determined that a supplier is not complying with all contractual requirements. Although Insmmed does not yet have internal procedures for specifically determining whether suppliers are complying with laws or company standards regarding slavery and forced labor, our Code of Business Conduct and Ethics requires internal and external stakeholders to report concerns about potential noncompliance (see anonymous hotline listed below).
- **Training:** All employees and management receive training on the Code of Business Conduct and Ethics and other applicable policies and procedures that cover Insmmed's prohibition of human trafficking and slavery, and ways to report any concerns with compliance. Our Business Code of Conduct and Ethics establishes principles and expectations for employees and contractors to follow, including laws related to labor practices. We enforce compliance with those expectations through training, and when necessary, disciplinary action.

Reports may be made to the Insmmed Hotline which allows you to report any concerns and violations or suspected violations confidentially 24 hours a day, 365 days a year:

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