

# **SPYRE THERAPEUTICS, INC.**

## **HUMAN RIGHTS POLICY**

**(dated January 9, 2025)**

### **I. INTRODUCTION**

Spyre Therapeutics, Inc. (the “Company” or “we”) is committed to conducting business with the highest ethical standards and in compliance with applicable laws and Company policy.

This Human Rights Policy (the “Policy”) establishes standards for business conduct related to human rights and labor for Company employees. This Policy is informed by, among other things, the International Bill of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the Ten Principles of the United Nations Global Compact, and the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

This Policy goes beyond mere compliance with law. When differences arise between standards and legal requirements, the stricter standard applies, in compliance with applicable law.

We are committed to ensuring that our employees, the people who work for our suppliers, contractors, and partners (collectively referred to herein as “suppliers”) and individuals in the communities affected by our activities, are treated with dignity and respect. We expect our employees to share this commitment and conduct themselves in accordance with this Policy, applicable laws, and all other Company policies, including the [Code of Business Conduct and Ethics](#).

We consider any violation of this Policy to be a serious breach of our trust, and any violation may result in disciplinary action, up to and including termination, as well as potential civil or criminal penalties, depending on the nature of the violation and applicable law. If you are aware of someone’s violation of this Policy, you have a duty to report the violation in accordance with the procedures detailed below. We depend on your commitment to protect our values and will view your reporting of violations in that context.

### **II. HUMAN RIGHTS PRINCIPLES**

We respect human rights. It is our aim to never be complicit in the violation of internationally recognized human rights. As part of our commitment to human rights, we expect Company employees to adhere to the following principles.

#### **A. Fair Treatment**

We are committed to ensuring that our team members and the people who work for/with our suppliers, and the individuals in the communities affected by our activities are treated with

dignity and respect. We strive to comply with all relevant labor and employment laws and expect our employees to do so as well. We do not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Without limiting the foregoing, physical discipline or abuse, the threat of physical discipline or abuse, any form of harassment and verbal abuse or other forms of intimidation are prohibited.

## **B. Equal Opportunity and Diversity**

We value the diversity of the people with whom we work and the contributions they make. We are committed to equal opportunity and strive to provide an inclusive environment that is free from all forms of inappropriate behavior, including unlawful harassment and discrimination. We expect our employees to maintain a workplace that is free from discrimination or harassment on the basis of actual or perceived age, color, disability, race, ethnicity, family or marital status, sex, gender identity or expression, language, national origin, social origin, ancestry, culture or customs, physical and mental ability, political affiliation or opinion, race, religion, sexual orientation, socio-economic status, veteran status, or any other category protected by law.

## **C. Safe and Healthy Workplace**

We provide a safe and healthy workplace. As a virtual company without any physical corporate offices, however, this commitment takes a different form than a traditional brick-and-mortar company. Our employees are expected to conduct their work in a safe manner in compliance with all Spyre policies. Employees also are expected to report all safety or health concerns to their manager or Human Resources.

We also recognize the importance of caring for our employees' mental health. We are committed to providing employees with resources to facilitate that need.

## **D. Forced Labor and Human Trafficking; Recruitment Fees**

We prohibit the use of all forms of forced labor<sup>1</sup>, including prison labor, indentured labor, bonded labor, military labor, slave labor and any form of human trafficking. Company employees must ensure that all work is voluntary, conducted only through freely agreed upon and documented employment terms and paid in accordance with all applicable laws and regulations. Company employees may not engage in any form of trafficking in persons or use forced labor in the performance of contracts.

Employees of the Company must have the right to freely terminate employment in accordance with applicable laws and regulations without fear of physical, psychological, sexual, or verbal abuse. Employees of the Company may not be required to lodge deposits of identity papers, including passports or work permits.

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<sup>1</sup> "Forced labor" means any work or service that is exacted from a person under the threat of penalty, and for which that person has not offered himself or herself voluntarily (as set forth in ILO Convention 29 on Forced Labour).

Recruitment fees may not be charged to employees or potential employees.

### **E. Child Labor**

We prohibit the use of child labor<sup>2</sup> in our business and supply chain. We require that all employees of the Company be of the appropriate age as defined by applicable local and national laws. We further prohibit the hiring of individuals that are under 18 years of age for positions in which hazardous work is required.

### **F. Work Hours, Fair Compensation and Benefits**

We are committed to fairly compensating employees. We strive to operate in full compliance with applicable wage, work hours, overtime, and benefits.

Company employee working hours must be reasonable. The Company may not require workers to work more than the maximum hours of daily labor set by applicable law. Overtime must be paid in accordance with all applicable laws and regulations for non-exempt employees.

Company employees must be paid living wages under humane conditions. The Company must provide all workers with clear, written information about its employment conditions with respect to wages before they enter employment and as required by law throughout their term of employment, including by providing employees with documentation on wages (as requested). Deductions from wages as a disciplinary measure are not permitted, unless permitted by applicable law. Wages and benefits paid for a standard working week must meet, at a minimum, applicable legal standards.

### **G. Freedom of Association**

Employees of the Company must be allowed to exercise freedom of association and receive the full benefit of applicable collective bargaining agreements.

### **H. Environmental Matters**

The Company is committed to operating its business in a manner that protects the environment as much as possible. The Company is also committed to compliance with all applicable environmental laws, regulations, and industry best practices, such as those that affect hazardous waste disposal, emissions, and water purity. The Company aims to conduct business in a responsible way that minimizes its environmental impact and promotes the sustainable use

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<sup>2</sup> "Child labor" includes employment below the minimum age as established in national legislation (as set forth in ILO Convention 138 on the Minimum Age for Admission to Employment), hazardous unpaid household services, and the worst forms of child labor (as set forth in ILO Convention 182 on the Worst Forms of Child Labor).

of resources. As a virtual company, the main way the Company mitigates its environmental impact is by having 100% of its employees work remotely.

## **I. Clinical Trials**

Spyre adheres to internationally accepted principles for the ethical conduct of clinical trials, including, for example and without limitation, those principles set forth in the Belmont Report, the U.S. Common Rule and local and international regulatory requirements. Spyre complies with all Good Clinical Practice (GCP) regulations and guidelines and will only sponsor research that adheres to GCP.

We respect the rights of human subjects participating in our clinical research trials. This respect is demonstrated by informed consent and additional procedures to protect privacy and all applicable laws and regulations. Our R&D efforts and clinical trials are developed and administered in ways that support our commitment to human rights.

## **III. REPORTING VIOLATIONS**

If you know or reasonably believe that there has been a violation of this Policy or any other illegal behavior, employees must report such violation or illegal behavior to their supervisor, Human Resources or the Chief Legal Officer. Additionally, employees, suppliers, contractors, partners and others may report any violations of this Policy or any other illegal behavior anonymously through the Company's whistleblower hotline. There are two methods of logging complaints anonymously:

Web Form: <https://report.syntrio.com/spyre>

Toll-Free Hotline:

- For English in the U.S. and Canada: 855-222-1214
- For Spanish in the U.S. and Canada: 800-216-1288
- For locations outside North America: 800-603-2869 (must dial country access code first, please refer to Exhibit A for instructions)

Failure to report a known or suspected violation of this Policy is itself a violation, and may result in disciplinary action up to, and including, termination.

## EXHIBIT A

### AT&T USA Direct Calling Instructions for Locations Outside of North America

1. Make sure you have an outside line.
2. Enter the [Access Code](#) for the country and/or the telephone system you are calling from. You will then hear a 'bong'.
3. An English-language voice prompt will ask for the number you are calling.
4. Enter our toll-free number: 800-603-2869. There is no need to dial "1" before the toll-free number.
5. You are now connected to the hotline.
6. A Lighthouse greeting will be played in [multiple languages](#). Make a choice from the pre-recorded language prompts or press 000 and tell the English operator the language you speak (preferably in English). An interpreter will then join the call in 2-3 minutes. The Lighthouse operator will interview you, aided by the interpreter.
7. A report in English is then sent to the designated recipient(s) of your company.
8. [Access Codes](#) are subject to change.