



Corporate Responsibility Statement

As of February 21, 2025

Spyre Therapeutics (Spyre) is a biotechnology company that aims to create the next-generation of inflammatory bowel disease (IBD) products by combining best-in-class antibody engineering, rational therapeutic combinations, and precision medicine approaches for patient selection. Spyre is not currently a commercial company and does not place any products, goods or services on the market for sale.

Our Workforce

Professional Development

Spyre has a robust employee training program across different departments. Employee training topics include, but are not limited to: preventing fraud; compliance with law; preventing discrimination and harassment; inclusion and belonging; and job-related technical and scientific training. Other trainings include how to give performance feedback, building trusted relationships and emotional intelligence. Spyre also regularly trains employees on scientific concepts and data relevant to our business and company at all hands meetings.

Employees are given mid-year and year-end feedback on their performance and demonstration of our core behaviors; they are also encouraged to discuss opportunities for future growth.

Benefits and Wellness

Spyre offers a comprehensive benefits package for all new employees, including competitive compensation inclusive of base salary, performance bonus, equity grant opportunities, and health and retirement benefits.

Spyre is committed to employee wellbeing. As a virtual company with 100% of our employees working remotely, we embrace variable work schedules for our employees. Among other things, we offer our employees flexible paid time off and two, one-week company-wide shutdowns.

Inclusion, Belonging & Culture

Spyre is committed to cultivating, fostering, and preserving a culture of inclusion and belonging. This commitment includes welcoming diversity of thought, background and experience, as well as striving to remove barriers and promoting equitable treatment. We value inclusive behavior and practices, and want all employees to feel a sense of belonging at Spyre.

Our team members are one of our key competitive advantages. The collective sum of our individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent represent a significant part of not just our culture, but a critical key to our reputation and success. Not only do we embrace differences, but we also aspire to treat everyone equally in all respects and based on merit regardless of these differences.

As of the date of this Statement, our total workforce is 51% women and 38% (5 out of 13 positions) of our executive management team (SVPs and above) is composed of women.

Health and Safety

As a virtual company without any physical corporate offices, Spyre does not have the traditional workplace safety training/performance you would see for a brick-and-mortar company. Notwithstanding this, 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. The Company provides stipends for set up of an ergonomic home office environment and also reimburses employees for gym memberships.

Mental Health

We recognize the importance of caring for our employees' mental health and providing them with resources to facilitate that need. Spyre provides its employees with numerous resources, including an Employee Assistance Program that has programs to promote mental health (including up to three in-person sessions with a counselor per issue, per year, per individual) and stress management courses through Cigna, Spyre's health insurance provider. Spyre has annual programming for Mental Health Awareness month which we hope helps reduce stigma surrounding mental health in the workplace. As part of this programming, we annually send a company-wide email summarizing company resources.

Spyre also has a Paid Time Off Policy which provides for flexible paid time off, facilitating mental health needs as they arise. Employees in management positions also are encouraged to look for signs of mental health risks in the workplace and, as appropriate, assist employees with managing their workload.

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, the Declaration of Helsinki, Council for International Organizations of Medical Sciences guidelines, 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.

- As part of its ethical conduct of clinical trials, Spyre specifically requires that there be appropriate ethical and scientific support for the involvement of any vulnerable populations in the clinical trials that it sponsors. Populations that are generally recognized as vulnerable in the context of clinical trials include pregnant women, human

fetuses, neonates, children, and prisoners, as well as persons with diminished decision-making capacity.

- Spyre has adopted policies and procedures, which include on- and off-site audits, to ensure that clinical trial sites carrying out Spyre-sponsored studies do so in a manner that promotes participant safety, compliance and data integrity. In all its clinical trials, Spyre implements policies and requirements for timely and thorough receipt and review of reports of serious adverse events.
- Spyre, directly and with its clinical trial partners, reviews the capacity of its clinical trial sites to conduct the study successfully and in accordance with Spyre's scientific and ethical norms, both before engaging the site and on an ongoing basis during the study. It is Spyre's policy that sites for its sponsored studies be selected based on sites' qualifications, training, prior research, clinical expertise in relevant fields, potential to recruit eligible research participants and ability to conduct research in a manner that is consistent with Spyre's principles and values.
- In reviewing the study site's abilities, Spyre and its partners take into account the risks presented by the particular clinical trial site (*e.g.*, the site's experience with similar trials as well as the expertise and track record of its senior leadership).
- When consistent with regulatory requirements and the ethical approval standards of a study, it is the policy of Spyre to make available to research subjects and other members of vulnerable populations from which subjects are recruited, reasonable access to any study product that becomes available from the research.
- Spyre will ensure that, if the research design calls for any genetic test results conducted in research to be returned to study subjects, such tests will be performed and returned to subjects in compliance with all applicable laws and regulations, including without limitation the Clinical Laboratory Improvement Amendments of 1988 (CLIA) and requirements relating to the pre- and post-test counseling of genetic test recipients.
- Spyre-sponsored studies will only use human biological samples in its research when Spyre-selected clinical trial sites have collected the samples or cells in compliance with, or obtained such cells or sample from vendors that follow, all legal requirements related to the collection, storage and transport of such samples, as well as appropriate ethical and quality control standards. Any such cells or samples used in Spyre research shall have been obtained pursuant to an appropriate consent of the donor to the extent required by law.
- Spyre is committed to using animals in research only when regulatory or scientific alternatives do not exist. For example, when possible, Spyre strives to use computer models, cell culture techniques, and any other appropriate methods to in order to minimize the need to use animals in research. When animals must be used in research, Spyre is committed to adhering to all applicable laws and ethical standards, including requiring that such studies be reviewed and approved by an animal welfare committee. Spyre also adheres to standards for animal research subject welfare and publicly discloses information about animals used in research.

Human Rights

We respect human rights and are committed to ensuring that our employees, workers in our supply chains and individuals in the communities affected by our activities are treated with

dignity and respect. As part of our commitment to human rights, we expect Spyre employees to adhere to our [Human Rights Policy](#).

Environmental Sustainability

Spyre is committed to operating in a manner that protects the environment as much as possible and is further committed to compliance with all applicable environmental laws, regulations, and industry best practices. We aim to conduct business in a responsible way that minimizes our environmental impact and promotes the sustainable use of resources. As a virtual company, the main way we mitigate our environmental impact is by having 100% of our employees work remotely.

As a virtual company, Spyre does not lease, own or operate corporate office, manufacturing or laboratory space. We outsource our manufacturing, clinical trials and certain other functions. As such, we do not generate hazardous waste or handle substances of concern, including medical waste. Our manufacturing and clinical trial partners are large, well-known companies that promote environmental sustainability and social responsibility, and have policies and procedures to maintain compliance with all applicable environmental, health and safety (EHS) laws and regulations.

Business Continuity and Resilience

Spyre's Compensation Committee and Board annually review company and Board succession plans for key personnel. Spyre also has a data recovery contingency plan and regularly trains employees on data security. Our information security policy is aligned with National Institute of Standards and Technology (NIST) security and privacy principles.