

Human Rights Policy

Background

Anavex Life Sciences Corp. and its affiliates and subsidiaries (“Anavex” or the “Company”) is committed to respecting Human Rights as defined by the International Bill of Human Rights, the International Labour Organization’s (ILO) Declaration of Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights. Therefore the Company wishes to adopt the following Human Rights Policy (the “Policy”).

Purpose and Scope

The purpose of this Human Rights Policy is to articulate the Company’s commitment to the protection of internationally recognized human rights and exercise human rights due diligence in all its business activities.

This policy applies to all officers, directors, employees, consultants, agents and other business partners acting on behalf of Anavex (each a “Covered Person”). Responsibility to adhere to this policy is the duty of each individual at every level of the Company.

Definitions

Child Labour. The term ‘child labor’ is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that is mentally, physically, socially or morally dangerous and harmful to children and/or interferes with their schooling by: depriving them of the opportunity to attend school, obliging them to leave school prematurely, or requiring them to attempt to combine school attendance with excessively long and heavy work. Whether or not particular forms of “work” can be called “child labor” depends on the child’s age, the type and hours of work performed, the conditions under which it is performed and the objectives pursued by individual countries. The answer varies from country to country, as well as among sectors within countries. For purposes of this policy and as set forth below, the minimum age for admission to employment is 18.

Forced Labour. Forced Labor includes any work for which someone has not offered himself or herself voluntarily, any work performed under threat of penalty, any work that is demanded as repayment for a loan or debt, any work for which the worker was recruited, transported, harbored, obtained, or received through the use of deception, intimidation, threat, force, or other forms of coercion for the purpose of exploitation, and any work performed by a prisoner that is not performed voluntarily or for which he or she does not receive pay.

- Signs of forced labor can include: holding, destroying, concealing, confiscating, or denying access of employees to their identification documents, such as passports, work permits, and travel documentation, and/or requiring workers to pay recruitment and other fees

and costs that create circumstances of debt bondage.

- Indentured labor is a form of forced labor in which a person is contracted to work without salary for a specific number of years.

Human Trafficking. Means the unlawful act of transporting or coercing people in order to benefit from their work or service, typically in the form of forced labour.

Indentured Labour. Indentured labour is a form of labour in which a person is contracted to work without salary for a specific number of years.

Principles

Anavex values diversity in the workplace. Discrimination or harassment based on race, sex, color, national origin, religion, age, disability, sexual orientation, gender identity, HIV status, or marital status is not acceptable and will not be tolerated in the workplace.

Anavex's employees are free to associate and collectively bargain.

Anavex employs workers at will and voluntarily. Anavex does not use forced labour, indentured labour, prison labour, human trafficked labour, or any other form of involuntary labour.

Anavex believes in treating employees with dignity and respect. Harassment and harsh and demeaning treatment are not tolerated. The Company endeavors to maintain a good work/life balance.

Anavex employees are paid competitively.

Anavex does not employ children. Our employees are all adults and meet the minimum age requirements set by local law.

Anavex strives to have a safe and productive office. Anavex allows employees to report unsafe working conditions or unethical practices without fear of reprisal or retaliation when reported in good faith.

Anavex endeavors to verify all contractors utilized do not employ forced labour, indentured labour, human trafficked labour, or any other form of involuntary labour. Anavex expects all contractors to follow minimum wage laws and to not employ anyone younger than 18 for any hazardous job.

All vendors, suppliers, consultants, and contractors will be expected provide assurances that they will follow the Anavex Supplier Code of Conduct as part of their Master Services Agreements.

Anavex is committed to conducting clinical trials that have social and clinical value, scientific validity, and a favorable risk to benefit ratio. Informed consent is obtained from all participants, and patient privacy is respected. ICH guidelines for clinical trials are followed, as are General Data Protection Regulation (GDPR) (European Parliament, Council of the European Union 2016) and Health Insurance Portability and Accountability Act (HIPAA) privacy regulations, as required. Permission for all clinical trials is obtained from the appropriate national agency, such as the FDA before commencement and enrollment of any clinical trial.

Due Diligence and Monitoring

Anavex has procedures in place to ensure our commitment to respect human rights as stated in this Policy is upheld in all aspects of the organization including:

- 1) Adopting this Policy by the Board of Directors and top management
- 2) Upholding international standards on human rights as a minimum requirement for conducting business, including through a Supplier Code of Conduct embedded into supplier Master Service Agreements.
- 3) Embedding this Policy into our Code of Conduct and Ethics and ensuring annual attestation and training for compliance with such Code of Conduct and Ethics.
- 4) Obtaining a thorough understanding of Anavex's potential human rights impacts and developing policies and practices to manage these risks.
- 5) Ensuring clinical trials are conducted in accordance with ICH guidelines through informed consent procedures.
- 6) Establishing a grievance mechanism for our workforce, suppliers and other stakeholders, including anonymous reporting of Policy violations through the Company's confidential whistleblower hotline.

Reporting and Compliance

All Covered Persons must immediately report any known, suspected or suggested violations of this Policy to the Company's CEO. Alternatively, Covered Persons can report any known, suspected or suggested violations of this Policy through the Company's Whistleblower Hotline by one of the following methods:

- a. **Email.** By email on a confidential basis which is forwarded directly to a designated member of the Board of Directors (the "**Board Member**") to: anavexhotline@anavexcorp.com. This hotline email address is forwarded directly to the Board Member who will maintain anonymity if so requested. However, employees may also use a non-identifiable or third-party email address to submit anonymous complaints to the hotline.
- b. **Audio Message.** Employees or others wishing to lodge a complaint or raise compliance concerns may contact 917-460-0668 to record an audio message. An audio file will be created and will be forwarded to the Board Member.

Additionally, Covered Persons may contact the Company's CEO with a question or concern about the application of this Policy. Any questions or violation reports will be addressed immediately and taken seriously and can be made anonymously. The CEO, Board Member or his/her designee will investigate any reported violations, and, if warranted, will determine an appropriate response, including corrective action and preventative measures. All reports will be treated confidentially to every extent possible.

The Company will not tolerate any retaliation against any Covered Person for raising, in good faith, a possible violation of this Policy or of a law, rule or regulation, Company policy or any Alleged Irregularity. Retaliation for reporting a U.S. federal offense is illegal under U.S. federal law. Any person who participates in retaliatory conduct will be subject to disciplinary action up to and including termination of employment or office. Misusing this Policy by knowingly or recklessly providing false information to the Company may also result in appropriate disciplinary action. Any Covered Person who deliberately fails to report a matter of noncompliance will be subject to appropriate disciplinary action.

Disclosure

This Policy, as may be amended from time to time, shall be posted on the Company's website. The Company shall state in its annual proxy statement that this Policy is available on the Company's website and provide the website address.

Adopted: April 25, 2024