

## **Allogene Therapeutics, Inc.**

### **Workplace Harassment, Discrimination and Retaliation Prevention and Complaint Procedures Policy**

#### **1.0 Purpose**

Allogene Therapeutics, Inc. (the “Company”) is committed to providing a work environment free of unlawful harassment and discrimination against employees, independent contractors, consultants, and other persons doing business with the Company by other employees or third parties. The Company’s policy strictly prohibits harassment or discrimination based on an individual’s sex (including pregnancy, childbirth, breastfeeding and medical conditions related to pregnancy, childbirth and breastfeeding), race, religion or religious creed, color, gender, gender identity, gender expression, sexual orientation, national origin or ancestry, physical or mental disability, medical condition (which includes genetic conditions or characteristics, cancer and cancer-related conditions), genetic information, marital status, domestic partner status, age, veteran or military status, or any other basis protected by federal, state or local law or ordinance or regulation. The Company will also not tolerate any harassing or discriminatory conduct that has the effect of unreasonably interfering with an individual’s work performance, or creating a hostile or offensive work environment. Similarly, the Company is committed to complying with all applicable laws protecting qualified individuals with disabilities, as well as employees’ religious beliefs and observances.

The Company has adopted this policy to formally define the Company’s position on unlawful harassment, discrimination and retaliation in the workplace and to define the process for resolution.

#### **2.0 Scope**

This policy applies to all applicants and employees (full-time, part-time and temporary), including co-workers, supervisors and managers, independent contractors and consultants at the Company, and other persons involved in the operation of the Company as described more fully below. This policy extends to all aspects of the Company’s employment practices, including recruiting, hiring, discipline, termination, promotions, transfers, compensation, benefits, training, leaves of absence and other terms and conditions of employment.

### 3.0 Policy

**3.1 Individuals and conduct covered.** The Company's policy applies to all persons involved in the operation of the Company and prohibits harassment or discrimination by any employee of the Company, including co-workers, supervisors and managers, as well as vendors, independent contractors, volunteers, interns, customers and any other persons. It also prohibits harassment or discrimination based on the perception that anyone has characteristics, or is associated with a person who has or is perceived as having characteristics, of those included as a protected class. No individual in the Company is exempt from the requirements of this policy, and all Company employees are expected to avoid any behavior or conduct that could reasonably be interpreted as violating this policy, regardless of whether that conduct occurs on or off Company premises, on social media, after hours or at events not sponsored by the Company.

Harassment of the Company's customers, clients, vendors, suppliers, independent contractors (or employees of any of the foregoing parties) is also strictly prohibited. Any such harassment will subject an employee to disciplinary action, up to and including termination of employment.

**3.2 Prohibited Conduct.** Workplace harassment is generally conduct that: does not relate to the business of the Company; has the purpose or effect of interfering with an individual's ability to work, or that creates a hostile, intimidating or abusive work environment; and is directed at an individual because of the individual's inclusion in or association with a protected class.

Among the types of unwelcome conduct prohibited by this policy are verbal conduct (such as epithets, slurs, negative stereotyping, derogatory comments, unwelcome jokes and teasing); visual conduct (such as graphics, symbols, computer displays or emails); and physical conduct (such as physically threatening another, blocking someone's way, etc.). In addition, the circulation or posting (including, but not limited to, by e-mail, blogging or web posting) or viewing on Company computers of written or graphic materials that reflect negatively on an individual's protected status is also prohibited. The Company's policy prohibits the conduct described above even if the conduct is not sufficiently severe or pervasive to constitute a legal violation.

Other forms of improper or abusive conduct may not rise to the level of unlawful discrimination or harassment, but are similarly detrimental to the work environment. The Company does not condone any form of abusive or otherwise improper conduct. Abusive conduct includes conduct of an individual in the workplace, with malice, that a reasonable person would find hostile, offensive, and unrelated to the Company's legitimate business interests. Abusive conduct may include repeated infliction of verbal abuse, such as the use of derogatory remarks, insults, and epithets, verbal or physical conduct that a reasonable person would find threatening, intimidating, or humiliating, or the gratuitous sabotage or undermining of a person's work performance.

**3.3 Sexual Harassment Defined.** Sexual harassment is a problem that deserves special mention. For purposes of this policy, sexual harassment is defined as unwelcome sexual advances, requests for sexual favors and other verbal, visual or physical conduct of a sexual nature when: (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (ii) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (iii) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance, or creating an intimidating, hostile or offensive working environment.

The following are terms often used when talking about sexual harassment:

- **Quid Pro Quo** - When employment decisions are based upon an employee's acceptance or rejection of unwelcome sexual advances or sexual behavior.
- **Hostile Work Environment** - May result from unwelcome sexual behavior or offensive, hostile, and/or intimidating behavior directed at an employee because of that employee's sex (gender).
- **Sex Discrimination** - Occurs when employment decisions are based upon an employee's sex (gender) or when an employee is treated differently because of his or her sex.

In addition, conduct may violate this policy even if it is not sexual in nature or motivated by sexual desire if such conduct is based on a person's sex (gender) and has the purpose or effect of creating a hostile work environment. Sexual harassment may involve individuals of the same or different genders.

Examples of conduct prohibited by this policy include:

- Verbal conduct such as epithets, derogatory jokes or comments, slurs or unwanted sexual advances, invitations or comments;
- Visual displays such as derogatory and/or sexually-oriented posters, postings, photography, cartoons, drawings or gestures or leering;
- Physical conduct including assault, unwanted touching, sexual gestures, intentionally blocking normal movement or interfering with work because of sex, race or any other protected basis;
- Threats and demands to submit to sexual requests as a condition of continued employment, or to avoid some other loss, and offers of employment benefits in return for sexual favors;
- Retaliation for reporting or threatening to report harassment or discrimination; and
- Communication via electronic media of any type that includes any conduct that is prohibited by state and/or Federal law, or by the Company's policy.

This list is illustrative only, and not exhaustive. No form of unlawful sexual harassment or discrimination will be tolerated. Employees who have any questions about what constitutes harassing or discriminatory conduct should contact their supervisor and/or Human Resources.

**3.4 Retaliation Is Prohibited.** The Company also prohibits retaliation against any individual who reports discrimination or harassment in good faith, who assists another in making a report, who cooperates in a discrimination or harassment investigation or who files an administrative claim with any government agency. Any individual who experiences, witnesses or becomes aware of any conduct he or she believes to be retaliatory must immediately follow the reporting procedures stated below.

Management and supervisory employees who become aware of conduct inconsistent with this policy against retaliation also must immediately report the conduct as described below, and this is true even if an employee reporting the alleged harassment requests the manager or supervisor not to do so. Retaliation is a serious violation of this policy and like harassment or discrimination itself, will be subject to disciplinary action, up to and including termination of employment.

**3.5 Reporting Responsibility and Procedure; the Company's Response.** The Company encourages all employees to report any incidents of harassment or discrimination forbidden by this policy immediately so that complaints can be promptly and fairly investigated and resolved. Employees who believe they have been unlawfully harassed or discriminated against should report the behavior to their supervisor and/or Human Resources as soon as possible after the incident. If the employee's supervisor and/or Human Resources is unavailable, or the employee believes it is inappropriate, or feels uncomfortable reporting the matter to his/her supervisor and/or Human Resources, the employee should report the inappropriate conduct immediately to the Chief Financial Officer. The employee will be asked to provide details of the incident(s), names of individuals involved and names of any witnesses. Supervisors will refer all harassment complaints to Human Resources.

All discrimination, harassment, abusive conduct and retaliation claims will be promptly investigated in a fair, impartial, and thorough manner that provides all parties appropriate due process and ensures that an attempt to reach a reasonable conclusion is made based on the evidence collected, and appropriate corrective action will be taken where warranted. To the extent possible, confidentiality of the complainant, witnesses and the alleged harasser will be protected against unnecessary disclosure.

If the Company determines that a violation of this policy has occurred, effective remedial action will be taken in accordance with the circumstances involved. Any employee determined by the Company to be responsible for harassment, discrimination or retaliation will be subject to appropriate disciplinary action, up to and including termination. The Company may exercise its discretion to put certain interim measures in place, such as a suspension, leave of absence or a transfer, while the investigation proceeds. Human Resources will advise the parties concerned of the results of the investigation to the extent consistent with the law and privacy rights. The Company will not retaliate against any employee for filing a complaint in good faith, nor tolerate or permit retaliation by management or co-workers.

Because the Company is committed to avoiding even the appearance of impropriety with respect to harassment, it may take corrective action toward any employee for inappropriate conduct learned during the course of any investigation, regardless of whether the conduct amounts to a violation of law or even a violation of this policy. If a person who is found to have engaged in harassment is not employed by the Company, the Company will take whatever corrective action it determines is reasonable and appropriate under the circumstances.

Employees should be aware that the Federal Equal Employment Opportunity Commission and the California Department of Fair Employment and Housing investigate and prosecute complaints of prohibited harassment in employment. Employees who think they have been harassed or retaliated against for resisting or complaining may file a complaint with the appropriate agency. Addresses and phone numbers for the local agencies can be found online at [www.dfeh.ca.gov](http://www.dfeh.ca.gov) and [www.eeoc.gov](http://www.eeoc.gov).

Employees who experience or witness harassment, discrimination or any other violation of the Company's policy should report it immediately to their supervisor and/or Human Resources. Employees can raise concerns and make reports without fear of reprisal or retaliation for opposing or reporting harassment or discrimination or for otherwise participating in processes connected with the investigation, proceeding or hearing conducted by the Company or a government agency with respect to such complaints.

Any supervisor who becomes aware of possible unlawful harassment or discrimination must immediately advise Human Resources so it can be investigated in a timely and thorough manner.

Employees who do not comply with this policy will be subject to disciplinary action, up to and including termination. Moreover, any supervisor or manager who condones or ignores potential violations of this policy will be subject to appropriate disciplinary action, up to and including termination of employment.

This policy is not intended to restrict communications or actions protected or required by Federal, state or local law.