

Equal Employment Opportunity and Harassment Policy

Equal Employment Opportunity

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at Immunomedics, Inc. will be based on merit, qualifications, and abilities. Immunomedics, Inc. does not discriminate in employment opportunities or practices on the basis of race, color, religion, sex, sexual orientation, national origin, age, disability, or any other characteristic protected by law.

Immunomedics, Inc. will make reasonable accommodations for qualified individuals with known disabilities, as required by applicable law.

Any employees with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their immediate supervisor or to Human Resources. Employees can raise concerns and make reports without fear of reprisal. Anyone found to be engaging in any type of unlawful discrimination will be subject to disciplinary action, up to and including termination of employment.

Sexual and Other Unlawful Harassment

Immunomedics recognizes the value of each individual and is committed to providing equal employment opportunities. It is the policy of Immunomedics to afford equal employment opportunities to qualified individuals, regardless of their age, national origin, nationality, race, ancestry, color, creed, religion, gender/sex (including pregnancy), affectional or sexual orientation, genetic information and testing, atypical hereditary cellular or blood trait, family or marital status, civil union or domestic partnership status, military or veteran status, or physical and mental handicap or disability (including perceived disability and AIDS or HIV status), and to comply with all applicable laws and regulations.

The policy of equal employment opportunity encompasses all aspects of the employment relationship including hiring, promotion, transfer, selection for training opportunities, wage and salary administration and the application of benefit plans and Company policies.

Sexual harassment and other forms of unlawful harassment are offensive and detrimental to morale, and as a result, interfere with the work effectiveness of the person(s) harassed. Immunomedics will not tolerate any type of unlawful harassment (including sexual harassment) of any employee by any other employee or outside individual who has a relationship with the Company (for example, outside vendors, contractors, customers or clients). This policy applies to all work-related settings and activities, whether inside or outside the workplace, and includes work-related social events. Immunomedics' property (for example, telephones, copy machines, facsimile machines, computers and computer

applications such as e-mail and Internet access) may not be used to engage in conduct that violates this policy.

Neither the existence of this policy, nor any policy prohibiting discrimination in employment, shall be used as a basis for excluding any employee in any protected class from participating in any business activity or work-related social event in order to avoid allegations of harassment.

What is Sexual Harassment?

Sexual harassment is behavior directed toward either a male or female employee(s) on the basis of gender. The behavior does not have to be aimed at a member of the opposite sex to be considered sexual harassment. Men can harass men and women can harass women. Sexual harassment can include sexual advances, requests for sexual favors, or verbal and physical conduct of a sexual nature when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of employment; or
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual; or
- 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.

While it is not possible to define precisely what type of conduct will constitute an intimidating, hostile or offensive working environment, it may include verbal abuse or insults of a sexual nature, sexual jokes or other references of a sexual nature, display or circulation of sexually degrading pictures or materials, inquiry regarding another employee's sexual experiences or activities, and other similar offensive conduct.

Other Forms of Harassment and Discrimination

It is also against Company policy to engage in verbal or physical conduct that denigrates or shows hostility or aversion towards an individual because of his or her age, national origin, nationality, race, ancestry, color, creed, religion, gender/sex (including pregnancy), affectional or sexual orientation, genetic information and testing, atypical hereditary cellular or blood trait, family or marital status, civil union or domestic partnership status, military or veteran status, or physical and mental handicap or disability (including perceived disability and AIDS or HIV status), or other protected category (or that of the individual's relatives, friends, or associates) that:

- Has the purpose or effect of creating an intimidating, hostile, humiliating, or offensive working environment;

- Has the purpose or effect of unreasonably interfering with an individual's work performance; or
- Otherwise adversely affects an individual's employment opportunities.

Depending on the circumstances, the following conduct may constitute discriminatory: epithets, slurs, negative stereotyping, jokes, or threatening, intimidating, or hostile acts, and/or written or graphic material that denigrates or shows hostility towards an individual or group that is circulated anywhere in the workplace (or at an off-site work location), or placed anywhere on Immunomedics' premises such as at an employee's desk or on Company bulletin boards or equipment (including electronic information systems and equipment).

Retaliation Prohibited

It also is the policy of Immunomedics to encourage employees to come forward with any complaints of sexual or other harassment and/or to cooperate in any investigation of harassment. This policy and the law prohibit retaliation against an employee for filing a complaint of sexual or other harassment or for cooperating in the investigation of such a complaint, and retaliation will not be tolerated.

Responsibilities of Supervisors and Employees

Supervisors are responsible for:

- Promptly responding to all alleged incidents of harassment by immediately reporting them to both their supervisors and to Human Resources.
- Educating employees under their direction and ensuring compliance with this policy.
- Eliminating behavior that constitutes unlawful harassment in the work environment.
- Protecting the privacy of persons reporting alleged harassment to the greatest extent practicable and disclosing information related to the alleged conduct only to those with a need-to-know.
- When appropriate, as determined by the Company, participating in the investigation of the alleged conduct and taking corrective and/or disciplinary action as directed by or agreed to by Human Resources or Senior Management of the Company.

Employees are responsible for:

- Behaving in a manner that does not constitute sexual harassment or other unlawful harassment of other employees.

- If the offended employee wishes, they may discuss any such behavior with the individual causing the problem to make him or her aware of the offensive nature of the behavior, that it is unwelcome, and to request that it stop.
- Reporting the behavior to their immediate supervisor (or their supervisor's supervisor, or Human Resources). Immunomedics obviously can only respond to those situations about which it knows. If the particular circumstances make a discussion or complaint to the supervisor inappropriate (e.g., if the complaint involves the supervisor or if retaliation from the supervisor is feared), employees should not hesitate to bring the matter to Human Resources.

Reporting and Investigating Harassment Allegations

If an employee at Immunomedics believes that he or she has been subjected to sexual or other harassment, the employee is strongly encouraged to inform his or her supervisor and one of the following persons:

<u>Name</u>	<u>Title</u>	<u>Telephone Number</u>
Amy Leland	Associate Director, Human Resources	973-605-8200 ext. 133
Susan Finan	Human Resources Administrator	973-605-8200 ext. 104

Any reported incident will be investigated promptly and thoroughly. Although each investigation will proceed as the particular circumstances warrant, an investigation will at a minimum involve an interview with the employee making the complaint and interviews with persons identified as witnesses or otherwise having knowledge of the incident or conduct. All persons will be instructed to treat the investigation as confidential and not to discuss the allegations with other persons, particularly those not involved in the incident or conduct. Also, all persons will be informed that Immunomedics will not tolerate any form of retaliation directed toward an individual who makes a complaint or who participates or cooperates in an investigation, and that any such retaliation is unlawful.

If, as a result of the investigation, it is determined that any individual engaged in conduct that either constitutes harassment or otherwise violates Immunomedics' policies or rules of conduct, appropriate remedial or disciplinary action will be taken. Such actions could include (among others) eliminating contact between the individuals involved in the incident, mandated training and/or counseling, demotion and/or termination. Immunomedics will also follow up with relevant employees to make certain that improper conduct has stopped and that there has been no discrimination or retaliatory action against a complaining employee.

The importance of this policy cannot be emphasized enough. An environment free of sexual harassment and other forms of harassment is not only the law, it is fundamental to Immunomedics' employment philosophy. While we hope that any employee who believes that he or she has been the victim of unlawful sexual or other harassment will bring the matter to the attention of a supervisor and/or a designated Company official immediately, employees also have the right to contact the New Jersey Division on Civil

Rights (“NJDCR”) and the Equal Employment Opportunity Commission (“EEOC”). Any complaint of sexual or other harassment must be filed with the NJDCR within one hundred eighty (180) days or with the EEOC within three hundred (300) days of the claimed harassment.

While it is the right of any employee to seek the assistance of these agencies, Immunomedics hopes that all employees will feel comfortable coming forward and allowing us to pursue a resolution of the matter internally. We believe that we have created a thorough and fair resolution process for such issues and will be able to work together to resolve any inappropriate situation involving sexual or other harassment.