

ANTI-MONEY LAUNDERING POLICY

1. SCOPE AND PURPOSE OF THE POLICY

- 1.1 This Policy applies to Captor Therapeutics S.A. (hereinafter the “Company”) and its subsidiaries (hereinafter collectively “**Captor Therapeutics**”), provided that its provisions do not conflict with the national laws applicable to those entities. All employees and regular associates of Captor Therapeutics are required to familiarise themselves with and comply with the provisions of the Policy.
- 1.2 The Anti-Money Laundering Policy (hereinafter the “Policy”) is introduced to incorporate into Captor Therapeutics’ operations the regulations and practices relating to:
- anti-money laundering (**AML**),
 - Know Your Customer proces (**KYC**),
 - Combatting the Financing of Terrorism (**CFT**).
- 1.3 Captor Therapeutics and its subsidiaries are not obliged institutions under the provisions of the Act of 1 March 2018 on the prevention of money laundering and the financing of terrorism (Journal of Laws, item 723, as amended), and this Policy is adopted voluntarily as an ethical standard and an expression of due diligence.

2. BASIC TERMS

- financing terrorism – an act defined in Article 165a of the Act of 6 June 1997 – the Criminal Code (i.e. Journal of Laws of 2025, item 383, as amended)
- KYC (Know Your Customer) – the process of verifying the identity and credibility of a business partner
- money laundering – an offence defined in Article 299 of the Criminal Code (i.e. Journal of Laws of 2025, item 383, as amended)

3. RISKS RELATED TO FINANCIAL CRIMES

Captor Therapeutics identifies four areas of risk associated with financial crime:

- costs (purchases) – funds are transferred by Captor Therapeutics to external entities whose purpose may be money laundering,
- revenue (research collaborations, partnerships) – collaboration involving the transfer of part of the benefits of intellectual property to a business partner of Captor Therapeutics may potentially be used by that business partner for money laundering,
- investing own funds – funds belonging to Captor Therapeutics may be used in an unlawful manner,
- financing of operations – an agreement concerning the financing of Captor Therapeutics’ operations (share subscription, bond subscription, granting of a loan) could potentially be used by an investor for money laundering.

4. RISK MITIGATION

- 4.1 Captor Therapeutics employs the following methods to prevent the risk of financial crime:
- costs (purchases):

- a. except in exceptional circumstances, payments are not made in cash (this applies in particular to transactions exceeding PLN 15.000),
 - b. as a general rule, payments are made after the invoice has been received and recorded,
- 2) Revenue (research collaborations, partnerships):
- a. no discussions are held with entities that could be suspected of money laundering or terrorist financing,
 - b. no discussions are held with entities subject to international sanctions imposed by Poland,
- 3) Investment of own funds:
- a. own funds are not invested in financial instruments that are not subject to AML/KYC/CFT processes in any OECD country,
- 4) financing of activities:
- a. as part of securities issues (other than those arising from incentive schemes), securities are offered exclusively to investors who have undergone the KYC process at the issuing institution.
- 4.2 Captor Therapeutics does not conduct a formalised KYC process, but applies the principle of limited trust and verifies partners based on:
- a. publicly available documents and registers (e.g. KRS, CEIDG),
 - b. sanctions lists (including the Ministry of the Interior and Administration list and EU lists),
 - c. the counterparty's reputation and industry reviews,
 - d. the history of previous cooperation.
- The employee initiating the cooperation is responsible for the initial verification of the counterparty.
- 4.3 Potential red flags include, amongst others:
- a. lack of basic information about the contractor,
 - b. unusual payment requests,
 - c. no economic justification for the transaction,
 - d. pressure to conclude the transaction quickly.

5. RELATED PROCEDURES

- 5.1 An employee shall report any transaction that may be linked to the commission of a financial offence in accordance with the "Procedure for reporting (including anonymous reporting) of violations of the law and of ethical procedures and standards". Making such a report does not preclude the possibility of reporting the transaction directly to law enforcement authorities.
- 5.2 The provisions of this Policy do not limit the rights and obligations of employees arising, in particular, from the "Captor Therapeutics Anti-Corruption Policy" and the "Captor Therapeutics S.A. Code of Ethical Conduct".
- 5.3 In situations that give rise to doubts but to which this Policy does not directly apply, the employee is obliged to comply with (in order of priority of the most relevant source of guidance):
- 1) the provisions of law,

- 2) internal regulations and policies in force at Captor Therapeutics S.A. and its subsidiaries,
- 3) instructions from their supervisor.

6. SUPERVISION AND UPDATES

- 6.1 The Chief Financial Officer is responsible for overseeing the implementation of this Policy.
- 6.2 Captor Therapeutics updates this Policy in response to changes in legislation or practices relating to the subject matter of the Policy.