

CAPTOR THERAPEUTICS S.A. CODE OF ETHICAL CONDUCT

The Captor Therapeutics S.A. Code of Ethical Conduct consists of professed Values and Principles of Conduct to maintain the highest ethical standards in business activities.

Captor Therapeutics conducts its business in an ethical, lawful manner, including respecting human rights and the interests of its employees, caring for the environment and the proper treatment of animals used in research, and requires the same from its business partners.

Mission

Captor Therapeutics' mission is to develop *first-in-class* medicines that will improve patients' quality of life.

Vision

The long-term vision is to create a biopharmaceutical company that is known as a stable and trusted provider of the highest quality clinical-stage medicines and as an organisation that maintains the highest ethical standards, operates in a culture of respect and continuous pursuit of innovation and scientific excellence.

Captor Therapeutics' Values

Captor Therapeutics is founded on the belief that through scientific excellence, planning and execution combined with collective thinking and respect, ventures can create and deliver innovative, breakthrough solutions regardless of geographical location, access to technology or funding.

- **Integrity.** Adherence to moral and ethical standards.
- **Collaboration.** Problems encountered are solved through collaboration and joined-up thinking, but responsibility remains with the individual.
- **Transparency.** The scientific, strategic and financial situation is open and transparent to all Captor shareholders. At the same time, each shareholder is responsible for the best possible performance of the company and is expected to be transparent in expressing his or her feelings, concerns and perceptions regarding Captor's well-being.
- **Scientific excellence.** Tolerance for failure, but no tolerance for incompetence. Willingness to experiment, but in a highly disciplined, data-driven and science-based manner. We embrace novel solutions, approaches if justified by scientific curiosity and the highest quality of research conduct.
- **Development.** Readiness for self-development and the development of others. Development encompasses all aspects of academic development, but also the evolution of leadership, communication, planning and delivery skills.
- **Discipline.** Achievements are the result of the conception of an idea, detailed short- and long-term planning and rigorous implementation of the plan. Each of these elements constitutes an individual discipline that requires thought and conscious cultivation. Idea generation is the ability to see gaps and inaccuracies in the current state of knowledge. Planning requires an understanding of goals and outcomes over a period of time and what is needed to achieve them in terms of staff (both skills and numbers), budget and strategic positioning of the company. Executing the plan is the ability to remain focused, committed and disciplined in implementing assigned tasks.

Principles of Conduct of Captor Therapeutics

1. Human rights

Captor Therapeutics conducts its business with respect for universally recognised human rights including by making efforts to exclude the use of products manufactured or services provided in violation of these rights.

A list of basic universally recognised human rights is contained in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights and the two main instruments to codify it: the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights).

The Company takes measures, in particular through the vetting of its counterparties and appropriate provisions in its contracts with contractors, to avoid entering into formal or informal cooperation with entities originating from countries subject to sanctions or committing violations of human rights, including fundamental principles of labour law.

The Company operates in a non-discriminatory manner understanding discrimination as any differentiation, exclusion or preference that results in a lack of equal treatment or equal opportunities without justifiable reasons.

2. Labour law

Captor Therapeutics complies with the law on employer-employee relations and other fundamental principles of labour law as defined by the International Labour Organisation.

The Company guarantees the freedom of association of employees, excludes the use of forced, compulsory or child labour and ensures equal opportunities and opposes harassment and discrimination in the workplace.

The Company ensures safe and hygienic working conditions for employees and implements appropriate monitoring and control mechanisms whenever working with hazardous substances.

The Company respects the personal rights of employees and protects their personal data and other confidential information related to them or their relatives.

3. Anti-corruption

Captor Therapeutics excludes the use of any unfair practices in business activities, in particular corruption, whether or not they are prohibited by law.

By corruption, the Company means the abuse of power or failure to perform duties to benefit the Company or a Company employee at the expense of the Company's interest.

Behaviours that are corrupt in nature and which the Company prevents and combats are, for example, bribery, kickbacks, acting within the framework of a conflict of interest, embezzlement, abuse of position for private gain, extortion, money laundering or dishonest accounting and reporting.

The Company places particular emphasis on preventing corruption and conflicts of interest in the Company's procurement of supplies and services using public funds.

4. Environmental protection

The Company is aware that the way it operates can have an impact on the environment and takes this into account when making its decisions.

Captor Therapeutics operates in compliance with the legal requirements for environmental protection and waste management that apply to the Company.

Captor Therapeutics takes measures to reduce greenhouse gas emissions and to conserve natural resources and reduce the environmental impact of the Company's activities, in particular by conserving the energy used by buildings, means of transport, production processes, equipment and electronic devices, and by reducing water consumption and making efficient use of the materials used in the Company's operations.

The Company promotes environmental activities among its employees.

5. Protection of laboratory animals

The Company counteracts the excessive and unethical use of animals in its research and scientific activities.

Captor Therapeutics operates in accordance with the legal requirements applicable to the protection of animals used for scientific or educational purposes and as Captor does not have its own animal testing facility, only works with partners and contractors who meet all relevant animal care and welfare regulations.

The Company adheres to the principle that animals may only be used in scientific research when their use is scientifically justified, when the expected benefits justify the risk of suffering to the animals and when the intended scientific goals cannot be achieved using methods that do not use animals.

The company limits the number of animals used in research and scientific activities.

6. Tools for dissemination, implementation, monitoring and evaluation of the principles

In each of the areas described above, Captor Therapeutics is taking systemic measures to publicise the Principles of Conduct, to implement them effectively and to monitor their compliance and their real impact on the Company's business.

All employees, associates and the Company's suppliers and service providers are informed of the Company's adoption and application of these Principles of Conduct. Employees and regular associates of the Company receive periodic training on the issues governed by the Principles of Conduct and other documents adopted and implemented in the Company in connection with the application of the Principles of Conduct.

In order to effectively implement the Principles of Conduct, the Company shall develop specific procedures, guidelines or other documents. In particular, the Company applies:

- 1) appropriate contractual clauses in contracts with suppliers and service providers to exclude the Company's complicity in violations of human rights, labour rights, activities of a corrupt nature, activities that do not respect animal rights or take actions that harm the environment;
- 2) an Anti-Corruption Policy to introduce detailed rules on anti-corruption, conflict of interest and cooperation with business partners, as well as rules on accepting and giving gifts;
- 3) appropriate purchasing procedures aimed at ethical, economically sound and lawful operation of the Company in the disbursement of public funds, in particular the Purchasing Procedure in accordance with the Competitiveness Rule of 23 December 2020 and the Procedure for the Implementation of procurement in projects co-financed by the Medical Research Agency of 17 July 2023;
- 4) Labour Regulations, Remuneration Regulations, Policy against discrimination, bullying and sexual harassment and procedures for the processing of personal data in employment and recruitment aimed at implementing and applying the fundamental principles of labour law, ensuring safe and hygienic working conditions, equality in the treatment of employees and respect for their rights and personal rights;
- 5) Regulations for the promotion and performance of environmental activities in CT dated 19 April 2021; and

- 6) appropriate contractual clauses and requirements for its contractors aimed at generalising the testing of the selected compounds in animal research models (not animals) and a commitment to the humane treatment of laboratory animals used for scientific purposes in compliance with the relevant legal requirements confirmed in particular by possession of current AAALAC (Association for Assessment and Accreditation of Laboratory Animal Care) certification or approval by the Ethics Committee or the National Ethics Committee for Animal Experimentation to work with animals and a certificate from the competent local district veterinarian that the contractors meet the conditions in this respect.

Captor Therapeutics promotes the prompt detection of any violations of the Principles of Conduct and, to this end, has implemented a Procedure for reporting violations of the law and ethical procedures and standards (whistleblowers) dated 7 March 2022.

The Company has appointed a person who is responsible for monitoring the provision of training on the issues governed by the Principles of Conduct and other documents adopted and implemented in the Company in connection with the application of the Principles of Conduct, as well as providing explanations on the Principles of Conduct and collecting comments, complaints and requests regarding their effective implementation and monitoring their observance and real impact on the Company's operations.

7. Standards underpinning the development of the principles

Captor Therapeutics' Principles of Conduct have been developed on the basis of international and national standards for responsible business practices using in particular:

- 1) OECD Due Diligence Guidance for Responsible Business Conduct;
- 2) UN Global Compact Management Model;
- 3) ISO 26000 standards;
- 4) UN Guiding Principles on Business and Human Rights;
- 5) ICC Code of Conduct on the fight against corruption;
- 6) Good Practices for Companies Listed on the WSE 2021;
- 7) Standards recommended for an anti-corruption compliance management system and a whistleblower protection system for companies listed on the markets organised by the Warsaw Stock Exchange.