

CAPTOR THERAPEUTICS ANTI-DISCRIMINATION POLICY

Considering

- 1) *fundamental principles of labour law, which include, in particular, the obligation to eliminate discrimination in matters of employment and occupation;*
- 2) *good practices of listed companies, according to which non-discriminatory rules are introduced in employment relations, in particular with regard to remuneration and ensuring equal pay for women and men;*
- 3) *principles resulting from the Labour Code consisting in the implementation of the obligation of equal treatment in employment, in particular regardless of gender, age, disability, race, religion, nationality, political beliefs, trade union membership, ethnic origin, religion, sexual orientation, employment for a definite or indefinite period of time, full-time or part-time employment and counteracting mobbing or bullying in the workplace*

Captor Therapeutics S.A. implements this Anti-Discrimination Policy.

1. SCOPE AND OBJECTIVE OF THE POLICY

- 1.1. This Anti-Discrimination Policy (hereinafter referred to as the "**Policy**") is in force at Captor Therapeutics S.A., with its registered office in Wrocław (address: 54-427 Wrocław, 11 Duńska Street), entered into the Register of Entrepreneurs of the National Court Register kept by the District Court for Wrocław Fabryczna in Wrocław, VI Commercial Division of the National Court Register, under KRS number 0000756383, with the share capital in the amount of PLN 464,571.20 – fully paid-up, NIP 8943071259, REGON 363381765 (hereinafter referred to as the "**Company**", "**Captor Therapeutics**" or "**Employer**") and in the Company's subsidiaries in relations with employees and natural persons being regular contractors ("**Employees**").
- 1.2. The implementation of the Policy is aimed at:
 - 1.2.1. an unambiguous and explicit declaration of the Company against discrimination in employment and recruitment and counteracting mobbing;
 - 1.2.2. defining and providing examples of discriminatory and mobbing behaviours that the Company will not tolerate;
 - 1.2.3. introduction of operating principles aimed at the implementation of the Policy;
 - 1.2.4. regulating the rules for reporting cases of discrimination and mobbing;
 - 1.2.5. dissemination of anti-discrimination and anti-mobbing rules.

2. BASIC CONCEPTS

- 2.1. Discrimination is defined as any unequal treatment in employment, whether directly or indirectly, in terms of establishing and terminating an employment relationship, terms and conditions of employment, promotion and access to training for the purpose of improving professional qualifications, in particular on the grounds of sex, age, disability, race, religion, nationality, political opinions, trade union membership, ethnic origin, religion, sexual orientation, temporary employment definite or indefinite or full-time or part-time ("**Discrimination**").
- 2.2. Examples of Discrimination are:
 - 2.2.1. formulating, as part of the recruitment process (in particular in recruitment advertisements), requirements that are not justified by the position to which the recruitment relates, e.g. gender requirements (also through wording suggesting a sex of an employee) (discrimination on the basis of sex);
 - 2.2.2. requesting information from the candidate for an Employee, also during recruitment interviews, that is not necessary to assess his/her suitability for the position to which the recruitment relates (e.g. information about disability, requiring the presentation of

- a photograph which may lead to discrimination on the grounds of race, ethnic origin, gender or religion, etc.);
- 2.2.3. differentiation of remuneration not justified by the qualifications, skills, experience or scope of the Employee's duties (e.g. on the basis of gender or the type of contract);
 - 2.2.4. unjustified application of precisely defined rules of promotion, access to training, additional benefits to selected Employees, while other Employees do not apply such rules at all or different rules apply (e.g. due to gender, type of contract, trade union membership, political beliefs);
 - 2.2.5. unjustified granting of holidays, permits to work remotely, in individually defined working hours or introducing other exceptions in the form of work conditions (e.g. due to religion, gender, type of contract);
 - 2.2.6. restricting the possibility of Employees to form associations.
- 2.3. Harassment is undesirable behaviour which has the purpose or effect of violating the dignity of an Employee and creating an intimidating, hostile, degrading, humiliating or derogatory atmosphere towards him/her. Harassment is a manifestation of Discrimination. ("**Harassment**").
- 2.4. Examples of Harassment are:
- 2.4.1. evaluating the Employee's performance in a way that violates the dignity of the Employee being evaluated;
 - 2.4.2. abuse of disciplinary institutions provided for by law and internal labour law;
 - 2.4.3. unjustified isolation of the Employee, both physically and by, for example, cutting them off from information to which they should have access;
 - 2.4.4. omitting an Employee from activities, even though his/her position and scope of responsibility justify his/her involvement;
 - 2.4.5. comments, especially those made to other Employees, referring to the Employee's characteristics, beliefs or actions that are not related to the performance of the employee's duties.
- 2.5. Sexual harassment is any undesirable conduct of a sexual nature or relating to the sex of an Employee, the purpose or effect of which is to violate the dignity of the Employee, in particular to create an intimidating, hostile, degrading, humiliating or derogatory atmosphere towards him/her, which may consist of physical, verbal or non-verbal elements. Sexual harassment is a manifestation of Discrimination. ("**Sexual Harassment**").
- 2.6. Examples of Sexual Harassment are:
- 2.6.1. unsolicited invitations to meetings that are not related to the performance of employee duties;
 - 2.6.2. comments about the Employee's sex life, relationships, or lack of a relationship;
 - 2.6.3. comments about the Employee's appearance that are not justified by the Employee's duties;
 - 2.6.4. Comments or jokes that portray a particular gender, certain genders, certain sexual behaviors, or sexual preferences in a negative way.
 - 2.6.5. touch, gestures, and other behaviors that are appropriate for a close non-employee relationship and are not justified in the workplace.
- 2.7. Mobbing is actions or behaviours concerning an Employee or directed against an Employee, consisting of persistent and long-term harassment or intimidation of an Employee, causing the Employee to underestimate their professional suitability, causing or intended to humiliate or ridicule the Employee, isolating them or eliminating them from the team of colleagues ("**Mobbing**").
- 2.8. Examples of mobbing are:
- 2.8.1. systematic and long-term humiliation, criticism or ridicule of an Employee;
 - 2.8.2. continuous isolation or exclusion of the Employee from the life of the team without a justified reason;

- 2.8.3. systematically delegating tasks to the Employee that are far below their qualifications or impossible to perform in order to humiliate them;
- 2.8.4. spreading false rumours or misinformation about an Employee;
- 2.8.5. constantly ignoring or marginalizing the contribution of the Employee's work.

3. ANTI-DISCRIMINATION DECLARATION

- 3.1. Captor Therapeutics is committed to creating a work environment free from Discrimination, Harassment, Sexual Harassment and Mobbing.
- 3.2. The Company recognises and appreciates the diversity of its Employees and the individuality of each Employee, and declares that all forms of Discrimination – whether based on gender, age, race, religion, nationality, sexual orientation, health, disability, social status or any other characteristic – are absolutely unacceptable and will be vigorously combated.
- 3.3. Captor Therapeutics is committed to preventing all forms of Discrimination, Harassment, Sexual Harassment and Mobbing, ensuring that no such behavior is ignored and perpetrators are held accountable. Any potential breach will be treated with the utmost seriousness and confidentiality.
- 3.4. The Employer's goal is to promote a culture of respect, equality and safety, where every employee feels valued and supported, and their rights are protected.
- 3.5. The Company will continuously monitor its operations and the policies and procedures it has developed to ensure effectiveness in eliminating all forms of discrimination, mobbing and other types of inappropriate behavior in the workplace.

4. NON-DISCRIMINATORY RECRUITMENT

- 4.1. When recruiting, the Company uses job advertisements that are gender-neutral and culturally sensitive, and clearly indicates that the organization values diversity and inclusion.
- 4.2. The Company, as far as possible and justified in a given recruitment process, makes efforts to ensure that the recruitment process is conducted in accordance with the following principles:
 - 4.2.1. The recruitment process uses standard procedures and assessment criteria for all candidates, including standardized interview and behavioural interview questions, to help objectively assess candidates;
 - 4.2.2. the recruitment process involves recruiters adequately trained in anti-discrimination;
 - 4.2.3. Recruiters with diverse gender, age, experience, and cultural backgrounds are involved in the hiring process, which can help you better understand and evaluate diverse candidates.
 - 4.2.4. candidates are given the opportunity to lodge complaints about the recruitment process and the Company promptly and with due diligence investigates these complaints;
 - 4.2.5. Recruitment process data is regularly reviewed and analysed in order to identify and correct possible Discriminatory actions.

5. COUNTERACTING DISCRIMINATION IN EMPLOYMENT

- 5.1. The Company establishes transparent and justified remuneration rules, which are included in the Remuneration Regulations.
- 5.2. The Company develops transparent and justified rules for evaluating the Employee's performance, as well as rules for promotions and access to training tailored to the position the Employee holds.
- 5.3. In the event that an Employee performs his/her work in a manner inappropriate for his/her position, the Company in the first place – if justified by the circumstances – in a manner that does not violate the Employee's dignity, presents the Employee with objections to the manner in which the work is performed and gives the Employee time and opportunity to improve it.
- 5.4. The Company conducts regular trainings for the management staff on counteracting discrimination.

6. PREVENTING SEXUAL HARASSMENT

- 6.1. Captor Therapeutics has a zero-tolerance policy for any undesirable behavior that is sexually suggestive or gender-specific.
- 6.2. Undesirable behaviour is any behaviour to which the affected person objected or which was of a non-employee nature and the affected person tolerated it for fear of consequences in the workplace.
- 6.3. The Company conducts regular trainings for employees on counteracting sexual harassment.

7. COUNTERACTING MOBBING

- 7.1. The Company conducts regular trainings for employees, especially for the management staff, on counteracting mobbing.
- 7.2. The Company supports the behaviour of Employees aimed at helping Employees affected by mobbing and encourages witnesses of mobbing to report such cases in accordance with the procedure provided for in the Policy.

8. REPORTING POLICY VIOLATIONS AND THE CONSEQUENCES OF VIOLATIONS

- 8.1. Any cases of violation of the rules resulting from the Policy, any Employee who is aggrieved by such a violation or witnesses thereof may report and will be considered in accordance with the procedure and rules of the Procedure for reporting violations of the law, procedures and ethical standards (whistleblowers) in force at Captor Therapeutics.
- 8.2. The Employer informs all Employees that a breach of the rules arising from the Policy may also constitute a breach of the rules of cooperation with the Company and may lead to termination of the contract with the Employee without notice.
- 8.3. The Employer informs all Employees that a breach of the rules resulting from the Policy may, in addition to the consequences referred to in the 8.2, give rise to liability for damages against the Company.

9. DISSEMINATION OF ANTI-DISCRIMINATION AND ANTI-MOBBING PRINCIPLES

- 9.1. In order to disseminate the principles of counteracting discrimination and mobbing, this Policy is published with access to all Employees in the Company's internal network.
- 9.2. The Company informs each newly hired Employee about the validity of the Policy and receives a statement from the Employee that it has read its contents.

10. OVERSIGHT OF POLICY IMPLEMENTATION AND EFFECTIVENESS

- 10.1. The Company appoints a person responsible for compliance with the Policy and informs all Employees of his/her appointment.
- 10.2. The Company conducts cyclical, anonymous surveys among Employees in order to detect cases of Discrimination or Mobbing and to assess the effectiveness of the implemented solutions to counteract these behaviors.