

WHISTLEBLOWER POLICY

Reference ID: POL-014-01	Effective date: 15 June 2021
Supersedes: not applicable	

Author/Process Owner	
<i>Mirjam von Zedtwitz</i> Mirjam von Zedtwitz / Director Legal Counsel	<i>17.06.2021</i> Date
Approved by	
<i>J. Gander</i> Julien Gander / General Counsel	<i>8.07.2021</i> Date
Approved by	
<i>P. Amstutz</i> Patrick Amstutz / Chief Executive Officer	<i>14.7.21</i> Date

Withdrawn by	
..... Name / Job Title Date
Replaced with :	

WHISTLEBLOWER POLICY

Reference ID: POL-014-01	Effective date: 15 June 2021
Supersedes: not applicable	

Author/Process Owner	
<i>Mirjam von Zedtwitz</i> Mirjam von Zedtwitz / Director Legal Counsel	<i>17.06.2021</i> Date
Approved by	
<i>J. Gander</i> Julien Gander / General Counsel	<i>17 June 2021</i> Date
Approved by	
<i>P. Amstutz</i> Patrick Amstutz / Chief Executive Officer	<i>18 June 2021</i> Date

Withdrawn by	
..... Name / Job Title Date
Replaced with :	

TABLE OF CONTENTS

1	PURPOSE AND AIMS	3
2	SCOPE	4
3	DEFINITIONS AND ABBREVIATIONS	4
3.1	Definitions	4
3.2	Abbreviations	5
4	PROCEDURE	5
4.1	Policy of Non-Retaliation	5
4.2	Compliance Officer and Audit Committee Chair.....	5
4.3	Anonymous Reporting of Complaints	6
4.4	Policy for Receiving and Investigating Complaints	6
4.5	Retention of Complaints	7
5	TRAINING	7
6	DOCUMENTATION	7
7	REFERENCES.....	7
8	APPENDICES.....	8
9	CHANGE HISTORY	8

1 PURPOSE AND AIMS

Molecular Partners AG (together with its subsidiaries worldwide, the **Company**), a company incorporated in Schlieren, Switzerland, and listed on the SIX Swiss Exchange (**SIX**) and The Nasdaq Stock Market (**Nasdaq**), is required to comply with all applicable laws of Switzerland, as well as the federal securities laws of the United States of America and the rules of Nasdaq.

The Company is committed to complying with all laws and regulations that govern its business, as well as maintaining high standards of financial, regulatory and cultural integrity, and the Company takes very seriously all complaints and concerns regarding accounting, internal accounting controls, auditing and other legal matters. The Company's financial information guides the decisions of management and is relied upon by the Company's shareholders, employees, directors and business partners. The Company's policies and practices have been developed to maintain the highest business, legal and ethical standards.

For these reasons, the Company maintains a workplace environment where all employees of the Company and each of its subsidiaries can raise concerns free of any harassment, discrimination or retaliation if they reasonably believe that they are aware of: (1) questionable accounting, internal accounting controls or auditing matters; (2) the reporting of fraudulent financial information of or by the Company; (3) violations of securities laws or other laws, rules and regulations; or (4) any activities or transactions that appear to violate the Company's Code of Conduct. Employees should report those concerns as soon as possible after discovery. Other third parties, such as consultants or vendors, may also report a good faith complaint or concern regarding accounting or auditing matters in accordance with this Whistleblower Policy (this **Policy**). The Company strives to encourage open communication so that such concerns may be raised without fear of retaliation in any manner.

The Audit and Finance Committee of the Company's Board of Directors (the **Audit Committee**) has established these procedures to facilitate the reporting of complaints regarding accounting or auditing matters. The procedures govern (i) the receipt, retention and treatment of complaints regarding accounting, internal accounting controls or auditing matters and (ii) the submission by employees (confidentially and anonymously, if they wish, in the United States, and in any other jurisdiction to the fullest extent legally permitted in such other jurisdiction), and the appropriate treatment, of concerns regarding accounting or auditing matters they believe to be questionable or violations of the Company's Code of Conduct or U.S. federal securities laws or other applicable state and federal laws, including the U.S. Foreign Corrupt Practices Act of 1977, as amended (the **FCPA**), the UK Bribery Act 2010 (the **UKBA**), the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and similar laws, in each case applicable to the Company. This Policy is a supplement to the Company's Code of Conduct and should be read in conjunction therewith.

This Policy is a binding document issued by the Board of Directors of the Company.

2 SCOPE

The document applies to all members of the Board of Directors and all members of the Executive Management, as well as any employee or contractor of the Company.

Other third parties, such as vendors, consultants, collaborators or partners also may report a good faith complaint regarding accounting or auditing matters in accordance with this Policy.

Timeliness is critical because, as with all investigations, evidential matter may deteriorate, disappear or otherwise become harder to discover or less useful as time passes. Employees and contractors are encouraged to provide as much detail as possible regarding dates, times, places, names of people involved in any way, actions or inactions, statements made or the identity of other evidential matter.

This Policy covers complaints relating to accounting and auditing matters, including the following:

- a. intentional error, fraud or gross negligence in the preparation, review or audit of any of the financial statements of the Company or any of its direct and indirect subsidiaries;
- b. intentional error, fraud or gross negligence in the recording of transactions of the Company or any of its direct and indirect subsidiaries;
- c. intentional noncompliance with the internal and reporting controls of the Company or any of its direct and indirect subsidiaries;
- d. significant deficiencies or material weaknesses in the internal or reporting controls of the Company or any of its direct and indirect subsidiaries;
- e. violations of the rules and regulations of the U.S. Securities and Exchange Commission (the **SEC**) that are related to accounting, internal accounting controls and auditing matters;
- f. fraud against investors, securities fraud, mail or wire fraud, bank fraud or fraudulent statements to management, outside auditors, the SEC or members of the investing public; or
- g. violations of the Company's Insider Trading Policy, the Company's Code of Conduct, the U.S. federal securities laws or other applicable state and federal or foreign laws, including the FCPA, the UKBA and similar laws.

Failure to report these matters to the Company, the appropriate government agency (including the SEC) or any relevant law enforcement agency may result in disciplinary action.

3 DEFINITIONS AND ABBREVIATIONS

3.1 Definitions

Company MPAG and its affiliates

Compliance Officer	MPAG's Compliance Officer responsible for handling compliance matters
Audit Committee	MPAG's Audit and Finance Committee as per the Organizational Rules of MPAG
Whistleblower	A person submitting a complaint regarding accounting matters.

3.2 Abbreviations

FCPA	U.S. Foreign Corrupt Practices Act of 1977, as amended
MPAG	Molecular Partners AG
Nasdaq	The Nasdaq Stock Market
SEC	U.S. Securities and Exchange Commission
SIX	SIX Swiss Exchange
UKBA	UK Bribery Act 2010

4 PROCEDURE

4.1 Policy of Non-Retaliation

Reprisal, threats, retribution or retaliation in any way against any person who has in good faith made a complaint or reported a concern, or against any person who assists in any investigation or process with respect to such a complaint or concern, is prohibited. Employees who believe that they have been subjected to any discrimination, retaliation or harassment for having submitted a complaint regarding questionable accounting, internal accounting controls or auditing matters, or the reporting of fraudulent financial information under this policy, or participating in an investigation relating to such a complaint, should immediately report the concern to the Compliance Officer or to any of their supervisors or to the chair of the Audit Committee. Any complaint that such discrimination, retaliation or harassment has occurred will be promptly and thoroughly investigated. If such a complaint is substantiated, appropriate disciplinary action will be taken, up to and including termination of employment/engagement for those individuals that engaged in the harassment or retaliation.

4.2 Compliance Officer and Audit Committee Chair

The Audit Committee has appointed the Company's **Compliance Officer** for responsibility for certain aspects of this Policy. The Compliance Officer is responsible for administering this Policy. The Compliance Officer is the General Counsel of the Company. The Audit Committee has also designated the Audit Committee Chair as the person responsible for receiving, reviewing and then investigating (under the direction and oversight of the Audit Committee) complaints under this Policy. The Audit Committee Chair may be reached by calling or emailing the Compliance Hotline as provided below. If an employee or contractor has a complaint covered by this Policy, such employee or contractor must report such matter to the Audit Committee Chair. If the suspected violation involves the Audit Committee Chair, the employee or contractor must instead report the suspected violation to the Compliance Officer or another member of the Audit Committee.

4.3 Anonymous Reporting of Complaints

The Company has also established a procedure under which complaints regarding accounting matters may be reported anonymously. Employees or contractors may anonymously report these concerns to either (i) leaving an anonymous message via a toll free call to the Company's Compliance Helpline at 0800 1777 9999, compliance@molecularpartners.com or the Company web based compliance tool <https://app.convercent.com/en-us/LandingPage/ec459424-57ff-e711-80e2-000d3ab6ebad>, or (ii) to the Compliance Office or the Compliance Officer via regular mail to Molecular Partners AG, Attn: Compliance Officer, Wagistrasse 14, 8952 Zürich-Schlieren Switzerland. Employees or contractors should make every effort to report their concerns using one or more of the methods specified above. The complaint procedure is specifically designed so that employees or contractors have a mechanism that allows the employee or contractor to bypass a supervisor he/she believes is engaged in prohibited conduct under this Policy. Anonymous reports should be factual, instead of speculative or conclusory, and should contain as much specific information as possible to allow the Compliance Officer, Audit Committee Chair and/or other persons investigating the report to adequately assess the nature, extent and urgency of the investigation.

4.4 Policy for Receiving and Investigating Complaints

Upon receipt of a complaint, the Audit Committee Chair will determine whether the information alleged in the complaint pertains to an accounting, internal accounting control or audit matter. The Audit Committee will be notified promptly of all complaints that pertain to an accounting, internal accounting control or audit matter and will determine the planned course of action. Complaints regarding matters other than accounting, internal accounting control or audit matter will be investigated by the Compliance Officer or other appropriate person designated by the Audit Committee Chair.

Initially, the Audit Committee will determine if there is an adequate basis for an investigation. If so, the Audit Committee Chair will appoint one or more internal or external investigators to promptly and fully investigate the claim(s) under the direction and oversight of the Audit Committee. The Audit Committee may also appoint other persons to provide direction and oversight of the investigation. The Audit Committee Chair or Compliance Officer, as appropriate, will confidentially inform the reporting person (if his or her identity is known) that the complaint was received and whether an investigator has been assigned.

Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review. Access to reports and records of complaints may be granted to regulatory agencies and other persons or parties at the discretion of the Audit Committee. Documents that are covered by the attorney-client communication and/or work-product privileges (including in each case their foreign-law equivalents) should not be disclosed unless the Compliance Officer has consented in writing to a waiver of privilege.

In all cases, prompt and appropriate corrective action will be taken by the Company, as overseen by the Audit Committee. An employee may be subject to disciplinary action, which may include the

termination of his or her employment, and a contractor may be subject to contractual actions and claims, which may include the termination of his or her engagement or a claim for damages, if the employee or contractor fails to cooperate in an investigation or deliberately provides false or misleading information during an investigation. The specific action that will be taken in response to a report will depend on the nature and gravity of the conduct or circumstances reported and the quality of the information provided. Where questionable accounting, internal accounting controls or auditing matters or the reporting of fraudulent financial information is verified, corrective action will be taken and, if appropriate, the persons responsible will be disciplined.

The Company endeavors to operate on a highly transparent basis and wants to be made aware of alleged wrongdoings and to address them as soon as possible. We encourage you to first address your concerns by following the procedures outlined herein for reporting to or through the Company, so that the Company may conduct its own internal investigation and take corrective action as quickly as possible. Among other things, the Company may choose to self-report certain matters to government or other agencies. However, nothing in this Policy is intended to prevent any employee or contractor from directly reporting information to law enforcement agencies when an employee or contractor has reasonable cause to believe that the violation of a law or regulation has occurred. A report to law enforcement agencies may be made instead of, or in addition to, a report directly to the Company through its management or the Company's Compliance Helpline.

4.5 Retention of Complaints

The Audit Committee Chair, with the assistance of the Compliance Officer as appropriate, will maintain a log of all complaints, tracking their receipt, investigation and resolution, and will prepare a periodic summary report for each member of the Audit Committee. Each member of the Audit Committee will have access to the log and the Audit Committee Chair may provide access to the log to other personnel involved in the investigation of complaints. Copies of the log and all documents obtained or created in connection with any investigation will be maintained in accordance with any established document retention policy.

Nothing in this Policy shall be construed to supersede mandatory provisions of Swiss law relating to document storage and retention, including in particular article 958f of the Swiss Code of Obligations of March 30, 1911, as amended.

5 TRAINING

The Process Owner is responsible for communicating, and providing adequate training of, the Policy.

6 DOCUMENTATION

This Policy is archived according to SOP GEN-003.

7 REFERENCES

MPAG's Code of Conduct

8 APPENDICES

N/A

9 CHANGE HISTORY

Version number	Changes
01	Initial version.