

POLICY

Related Person Transactions	
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Confidential	Page 1 of 8

TABLE OF CONTENTS

1	PURPOSE.....	1
2	SCOPE	2
3	REFERENCES	4
3.1	Regulations, Guidelines and Publications	4
3.2	Governing Documents.....	4
4	DEFINITIONS AND ABBREVIATIONS.....	4
4.1	Definitions	4
4.2	Abbreviations.....	5
5	PROCEDURE	5
5.1	Identification of Related Persons and Dissemination of Information.....	5
5.2	Advance Approval of Related Person Transactions.....	5
5.3	Ratification of Related-Person Transactions.....	6
5.4	Approval Process and Guidelines	6
5.5	SEC Compliance; Interpretation.....	7
6	DOCUMENTATION	7
7	APPENDICES	7
8	CHANGE HISTORY.....	8

1 PURPOSE

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 adopting this related person transactions policy (**POL**) to set forth the procedures for the identification, review, consideration and approval or ratification of transactions involving the Company and any “Related Person” (as defined below) by the Audit Committee of the Company’s Board of Directors (**Board**) or by such other committee of the Board as shall be appropriate.

MOLECULAR PARTNERS	
Related Person Transactions	
Document Number: MP-DOC-02987	Document Version: 1.0
Confidential	Page 2 of 8

This POL has been approved by the Board. The Audit and Finance Committee of the Board (**Audit Committee**) will review and recommend to the Board, from time to time, any amendments to this Policy.

This POL is a supplement to the Company's Organizational Rules and should be read in conjunction therewith.

2 SCOPE

The document applies to:

- a. For so long as the Company qualifies as a foreign private issuer under the federal securities laws of the United States of America, any:
 - i. enterprise that directly or indirectly through one or more intermediaries, controls or is controlled by, or is under common control with, the Company;
 - ii. associate, i.e., any unconsolidated enterprise in which the Company has a significant influence or which has significant influence over the Company;
 - iii. individual owning, directly or indirectly, an interest in the voting power of the Company that gives them significant influence over the Company, and close members of any such individual's family;
 - iv. key management personnel, i.e., those persons having authority and responsibility for planning, directing and controlling the activities of the Company, including directors and senior management and close members of such individuals' families; or
 - v. enterprise in which a substantial interest in the voting power of the Company is owned, directly or indirectly, by any person described in iii and iv above or over which such a person is able to exercise significant influence. This includes enterprises owned by directors or major shareholders of the Company and enterprises that have a member of key management in common with the Company.

For purposes of the above:

Close members of an individual's family are those that may be expected to influence, or be influenced by, that person in their dealings with the Company.

Significant influence over an enterprise is the power to participate in the financial and operating policy decisions of the enterprise but is less than control over those policies. Shareholders beneficially owning a 10% interest in the voting power of the Company are presumed to have a significant influence on the Company.

MOLECULAR PARTNERS	
Related Person Transactions	
Document Number: MP-DOC-02987	Document Version: 1.0
Confidential	Page 3 of 8

- b. Thereafter, any:
- i. person who is, or at any time since the beginning of the Company last fiscal year was, a director or executive officer of the Company or a nominee to become a director of the Company;
 - ii. security holder known by the Company to be the beneficial owner of more than 3% of any class of the Company voting securities (a **Significant Shareholder**);
 - iii. **Immediate Family Member** of any of the foregoing, which means any child, stepchild, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law of such person, and any person (other than a tenant or employee) sharing the household of such person; and
 - iv. firm, corporation or other entity in which any of the foregoing persons is an executive, partner or principal or similar control position or in which such person has a 3% or greater beneficial ownership interest (an **Affiliate**).

The persons itemized in Section 2(a) and Section 2(b) above, as applicable, are collectively referred to as **Related Persons** and each individually as a **Related Person**.

This POL applies in relation to:

- a. for so long as the Company qualifies as a foreign private issuer under the federal securities laws of the United States of America: a transaction, arrangement or relationship (or any series of similar transactions, arrangements or relationships) in which the Company and any Related Person are, were or will be participants in which the amount involved exceeds USD 120,000 (or the equivalent in Swiss Francs or foreign currencies), or which is unusual in its nature or conditions; and
- b. thereafter: a transaction, arrangement or relationship (or any series of similar transactions, arrangements or relationships) in which the Company and any Related Person are, were or will be participants in which the amount involved exceeds USD 120,000 (or the equivalent in Swiss Francs or foreign currencies).

These transactions are referred to as **Related Person Transactions**.

Transactions involving compensation for services provided to the Company as an employee, consultant or director shall not be considered Related Person Transactions under this POL. A transaction, arrangement or relationship in which a Related Person's participation is solely due to the Related Person's position as a director of an entity that is participating in such

MOLECULAR PARTNERS	
Related Person Transactions	
Document Number: MP-DOC-02987	Document Version: 1.0
Confidential	Page 4 of 8

transaction, arrangement or relationship shall not be considered a Related Person Transaction under this POL.

3 REFERENCES

3.1 Regulations, Guidelines and Publications

Securities and Exchange Commission Rules & Regulations

SIX Directive on Information relating to Corporate Governance

3.2 Governing Documents

Document Number	Document Type	Document Name
MP-DOC-00211	SOP	Archiving

4 DEFINITIONS AND ABBREVIATIONS

4.1 Definitions

Affiliate	A firm, corporation or other entity in which (i) a director or executive officer of the Company or a nominee to become a director of the Company, (ii) an Immediate Family Member, or (iii) a Significant Shareholder is an executive, partner or principal or similar control position or in which such person has a 3% or greater beneficial ownership interest.
Audit Committee	MPAG's Audit and Finance Committee as per the Organizational Rules of MPAG.
Company	MP
Immediate Family Member	Any child, stepchild, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law of such person, and any person (other than a tenant or employee) sharing the household of a (i) director or executive officer of the Company or a nominee to become a director of the Company, or (ii) beneficial owner of more than 3% of any class of the Company voting securities.
Related Person	A (i) director or executive officer of the Company or a nominee to become a director of the Company, or (ii) a Significant Shareholder, or (iii) and Immediate Family Member, or (iv) an Affiliate.
Related Person Transaction	A transaction, arrangement or relationship (or any series of similar transactions, arrangements or relationships) in which the Company and any Related Person are, were or will be

MOLECULAR PARTNERS	
Related Person Transactions	
Document Number: MP-DOC-02987	Document Version: 1.0
Confidential	Page 5 of 8

participants in which the amount involved exceeds USD 120,000 (or the equivalent in Swiss Francs or foreign currencies), or which is unusual in its nature or conditions; and a transaction, arrangement or relationship (or any series of similar transactions, arrangements or relationships) in which the Company and any Related Person are, were or will be participants in which the amount involved exceeds USD 120,000 (or the equivalent in Swiss Francs or foreign currencies).

Significant Shareholder A beneficial owner of more than 3% of any class of the Company's voting securities.

4.2 Abbreviations

Board	Board of Directors of Molecular Partners AG
POL	Policy
MPAG	Molecular Partners AG
MP	Molecular Partners AG and any subsidiaries (such as Molecular Partners Inc.)
Nasdaq	The Nasdaq Stock Market
SEC	U.S. Securities and Exchange Commission
SIX	SIX Swiss Exchange

5 PROCEDURE

5.1 Identification of Related Persons and Dissemination of Information

The Company shall review all known transactions, arrangements and relationships in which the Company and a Related Person are participants to determine whether such transactions, arrangements and relationships constitute Related Person Transactions. In addition, each director and executive officer shall, and the Company shall request each Significant Shareholder to, notify all of his Affiliates and Immediate Family Members requiring that, before they or, with respect to Immediate Family Members, any of their Affiliates may engage in any Related Person Transaction, they must inform the director, executive officer or Significant Shareholder in advance and may not proceed with the transaction in the absence of approval pursuant to this Policy. The director, executive officer or Significant Shareholder shall be obligated to report the proposed transaction to the Company's management for consideration and approval by the Audit Committee as a Related Person Transaction in accordance with the terms of this POL.

5.2 Advance Approval of Related Person Transactions

Under this POL, any proposed transaction that has been identified as a Related Person Transaction may be consummated or materially amended only following approval by the

MOLECULAR PARTNERS	
Related Person Transactions	
Document Number: MP-DOC-02987	Document Version: 1.0
Confidential	Page 6 of 8

Audit Committee in accordance with the provisions of this POL. In the event that it is inappropriate for the Audit Committee to review the transaction for reasons of conflict of interest or otherwise, after taking into account possible recusals by Audit Committee members, then the Related Person Transaction shall be approved by another independent body of the Board.

5.3 Ratification of Related-Person Transactions

Under this POL, any Related Person Transaction, if not a Related Person Transaction when originally consummated, or if not initially identified as a Related Person Transaction prior to consummation, shall be submitted to the Audit Committee for review and ratification in accordance with the approval process and guidelines set forth in Section 5.4 below as soon as reasonably practicable. The Audit Committee shall consider whether to ratify and continue, amend and ratify, or terminate or rescind such Related Person Transaction.

5.4 Approval Process and Guidelines

- a. In the event that the Company proposes to enter into, or materially amend, a Related Person Transaction, the Company's management shall present such Related Person Transaction to the Audit Committee for review, consideration and approval or ratification. The presentation shall include, to the extent reasonably available, a description of (a) all of the parties thereto, (b) the interests, direct or indirect, of any Related Person in the transaction in sufficient detail so as to enable the Audit Committee to fully assess such interests (c) a description of the purpose of the transaction, (d) all of the material facts of the proposed Related Person Transaction, including the proposed aggregate value of such transaction, or, in the case of indebtedness, that amount of principal that would be involved, (e) the benefits to the Company of the proposed Related Person Transaction, (f) if applicable, the availability of other sources of comparable products or services, (g) an assessment of whether the proposed Related Person Transaction is on terms that are comparable to the terms available to or from, as the case may be, an unrelated third party or to employees generally and (h) management's recommendation with respect to the proposed Related Person Transaction. In the event the Audit Committee is asked to consider whether to ratify an ongoing Related Person Transaction, in addition to the information identified above, the presentation shall include a description of the extent of work performed and remaining to be performed in connection with the transaction and an assessment of the potential risks and costs of termination of the transaction, and where appropriate, the possibility of modification of the transaction.
- b. The Audit Committee, in approving or rejecting the proposed Related Person Transaction, shall consider all the relevant facts and circumstances deemed relevant by and available to the Audit Committee, including, but not limited to (a)

MOLECULAR PARTNERS	
Related Person Transactions	
Document Number: MP-DOC-02987	Document Version: 1.0
Confidential	Page 7 of 8

the risks, costs and benefits to the Company, (b) the impact on a director’s independence in the event the Related Person is a director, Immediate Family Member of a director or an entity with which a director is affiliated, (c) the terms of the transaction, (d) the availability of other sources for comparable services or products and (e) the terms available to or from, as the case may be, unrelated third parties or to or from employees generally. The Audit Committee shall approve only those Related Person Transactions that, in light of known circumstances, are in, or are not inconsistent with, the best interests of the Company and its shareholders, as the Audit Committee determines in the good faith exercise of its discretion.

5.5 SEC Compliance; Interpretation

All executive officers and directors of the Company will abide by the securities laws that govern related party transactions. As a result, the actions or relationships that will be considered covered by this POL with respect to the Company’s executive officers and directors are those that meet the requirement for disclosure in the Company’s periodic filings with the Securities and Exchange Commission pursuant to Part I, Item 7B of Form 20-F or Item 404 of Regulation S-K, as applicable, which are referred to as “related party transactions.” Such related party transactions must be approved by the Audit Committee as required by applicable laws and regulations, and provided such approval is obtained in advance and such transactions are publicly disclosed, such approval shall not be deemed a waiver of this POL or other policies of the Company.

This POL is intended to comply with Part I, Item 7B of Form 20-F and shall be interpreted in such a manner as to comply therewith.

Nothing in this POL shall be construed to supersede mandatory provisions of Swiss corporate law or Swiss securities laws or regulations in each case applicable to the Company, including in particular the requirements set out in article 718b of the Swiss Code of Obligations of March 30, 1911, as amended from time to time, and in the SIX Directive on Information relating to Corporate Governance of January 1, 2023, as amended from time to time.

6 DOCUMENTATION

This POL is archived according to SOP “Archiving”, MP-DOC-00211.

7 APPENDICES

None.

MOLECULAR PARTNERS	
Related Person Transactions	
Document Number: MP-DOC-02987	Document Version: 1.0
Confidential	Page 8 of 8

8 CHANGE HISTORY

Version Number	Change description / justification
1.0	Initial document version in Veeva Vault.