Kuros Bioscience AG

INSIDER TRADING POLICY

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KUROS BIOSCIENCES AG

This Insider Trading Policy (the "**Policy**") has been adopted by the Board of Directors (the "**Board**") of Kuros Bioscience AG (the "**Company**") on 17 December 2025 and supersedes any Policy previously adopted by the Board.

1. POLICY STATEMENT

1.1. Any person covered by the Policy with knowledge of Insider Information (as defined below) must not trade in the Company's Securities (as defined below), disclose such information to third parties, or encourage others to trade in such Securities.

1.2. Any violation of this Policy is a serious disciplinary offense, entitling the Company to impose sanctions under applicable law and the relevant contractual agreement, including termination for cause. Furthermore, violating these rules, particularly on insider trading, may lead to criminal sanctions (fines and/or imprisonment) under article 154 of the Financial Market Infrastructure Act ("**FMIA**").

2. PURPOSE AND SCOPE

2.1. Purpose

As a company listed on the SIX Swiss Exchange ("**SIX**"), the Company must comply with all applicable disclosure, reporting, and market conduct laws. These include the rules and regulations of SIX and the Swiss Financial Market Supervisory Authority FINMA ("**FINMA**").

This Policy establishes a framework to ensure compliance with these laws, rules, and regulations. It defines the rules and procedures to prevent the abuse of Insider Information (as defined below) and market manipulation, as set out in articles 142-143 and 154-156 FMIA, article 122 et seq. of the Swiss Federal Financial Markets Infrastructure Ordinance, and FINMA Circular 2013/08 on market conduct rules.

2.2. Scope of this Policy

This Policy applies to any person with knowledge of Insider Information which is (i) employed by or any of its affiliates included in its consolidated financial statements (ii) affiliated (e.g. as Board member or consultant) with the Company or any of its affiliates included in its consolidated financial statements and (iii) any individuals who have been designated to assume such a role and who, in anticipation thereof, are given knowledge of Insider Information.

2.3. Explanation of Key Terms

Capitalized terms used but not defined herein shall have the meaning ascribed to them by the Organizational Regulations of the Company in the version of 17 December 2025 (as amended from time to time).

- The Policy applies to all "**Insiders**", which for purposes of this Policy includes all persons employed by or affiliated (e.g. as Board member or consultant) with the Company, as well as all companies included in its consolidated financial statement and any individuals who have been designated to assume such a role and who, in anticipation thereof, in each case with knowledge of Insider Information. The person entrusted by the Company with certain oversight task ("Compliance Officer)" shall in accordance with the Listing Rules furnish and maintain a list of Insider Information in general or based on job responsibilities or specific projects. Each person on such list is considered an Insider for the purposes of this Policy. The Compliance Officer shall communicate such designation to the respective individuals identified as Insiders.

- The term "**Insider Information**" is any Non-Public fact, the publication of which is Price Sensitive.

- Information is considered to be "**Price-Sensitive**" if its publication might result in a significant change in the price of Company shares or other Securities. Examples of Insider Information include (but are not limited to) (i) facts concerning scientific or regulatory results, (ii) financial results or forecasts, (iii) corporate collaborations or strategic partnerships, (iv) mergers or acquisitions, (v) top management or control changes, (vi) major litigation, (vii) significant borrowings or public or private financings, (viii) impending bankruptcy or liquidation, and (ix) other external events.

- A good rule of thumb to determine whether certain information is Insider Information is to consider whether the information makes you want to buy or sell Securities in the Company. If so, it would probably have the same effect on others. When in doubt, do not trade!

- Information is "**Non-Public**" if it is not generally available to investors. It may constitute Insider Information. Information remains Non-Public until it has been effectively disclosed to the investing public and the market has had sufficient time to absorb it.

- Even in the case of widespread and accurate rumors, the relevant information remains Non-Public until the Company officially discloses it

- The term "**Related Person**" means (1) domestic partners, (2) individuals living in the same household as the Insider, and (3) legal entities, partnerships and fiduciary institutions, if the Insider: (i) holds a management position within that entity, (ii) controls the company directly or indirectly, or (iii) is a beneficiary of this company or institution.

- The term "**Securities**" means any listed or pre-listed shares, debt instruments, and any other financial instruments issued by the Company. This also includes all related derivatives, options, and other equity-linked instruments (irrespective of their issuer), whose prices may be substantially influenced by Securities issued by the Company, whereas a performance linked 25% or more of the Company's shares performance shall be construed as substantial influence.

- The term "**Trading Plan**" means a set of instructions leading to the acquisition or disposition of a predefined number of Securities at objectively pre-defined prices in one or several Transactions.

- The term "**Transaction**" includes the actual purchase or sale of Securities, any contract to purchase or sell, or otherwise to acquire or dispose of Securities, whether by the Insider directly or indirectly through third parties or fiduciaries. This extends to a broad range of Transactions, in particular (i) the purchase or sale of Company shares (cash-for-stock Transactions), (ii) conversions, (iii) the exercise, purchase and sale of stock options such as warrants, put options, call options or other derivatives related to Securities, (iv) engaging in short sales or (v) engaging in hedging Transactions.

3. GENERAL RULES OF CONDUCT FOR INSIDERS

3.1. Access to and Handling of Insider Information

Insider Information about the Company may only be disclosed on a strict need-to-know basis and solely to the extent necessary for an employee or consultant to properly perform their duties. Disclosing Insider Information to any person, whether inside or outside the Company, is prohibited unless the disclosure is:

a. Required for legitimate business purposes;

b. Made only after the execution of a suitable confidentiality agreement; and

c. Authorized in advance by the Board, the Chief Executive Officer ("**CEO**"), the Compliance Officer or any other person the Board may designate from time to time.

All Insiders are required to take appropriate steps to safeguard and restrict access to Insider Information. This includes:

a. Maintaining the confidentiality of Company-related Transactions;

b. Reviewing confidential documents and electronic files in a manner that prevents access by unauthorized persons;

c. Restricting access to physical and electronic files containing Insider Information to those with a legitimate need to know;

d. Ensuring that conference rooms and workspaces are cleared of confidential materials immediately after meetings or discussions;

e. Disposing of confidential materials securely (e.g., through shredding or approved digital deletion) when no longer required for business or legal reasons;

f. Limiting access to areas or systems where confidential information is stored; and

g. Avoiding discussions of Insider Information in public or semi-public spaces such as elevators, hallways, restaurants, airplanes, or other areas where conversations may be overheard.

Insiders are strictly prohibited from using Insider Information for any purpose other than performing their duties. They must not use Insider Information for personal advantage, to benefit others, or to influence trading decisions in the Company's Securities or those of other entities.

3.2. Inquiries From Third Parties

Inquiries from third parties, such as industry or financial analysts or members of the media, about the Company should be directed to the person designated by the CEO.

4. GENERAL TRANSACTION RESTRICTIONS

Any Insider who is in possession of Insider Information or is subject to a Blackout Period (as defined below) may not:

a. Make any Transaction, e.g. directly or indirectly sell, buy, or enter into an option or similar transaction relating to Securities, whether for his or her own account or for the account of another person (subject to a pre-arranged Trading Plan in accordance with Section 8);

b. Disclose Insider Information to anyone other than a person whose position requires him or her to know the Insider Information and who (i) is, or by receipt of such Insider Information becomes, subject to this Policy, or (ii) is subject to a statutory or professional secrecy obligation, or (iii) has executed a written confidentiality undertaking (including standstill); or

c. Recommend to, induce or instruct another person to sell, buy or otherwise deal in Securities;

d. initiate a Transaction within twenty-four (24) hours following the public disclosure of Insider Information known to such Insider.

5. PRE-CLEARANCE OF TRANSACTIONS

5.1. Board members, members of the Executive Committee, and other persons specifically designated by the Compliance Officer ("**Pre-Clearance Insiders**") must preclear all Transactions in Company Securities for themselves or their Related Persons.

This requirement applies to all Transactions of such Pre-Clearance Insiders, including acquisitions, dispositions, loans, pledges, the exercise of call options with a subsequent sale of Company stock, and creating or modifying a Trading Plan.

5.2. Pre-Clearance Insiders must obtain pre-clearance for any aforementioned Transaction from the Compliance Officer or their designee at least two (2) business days before the proposed Transaction. The CEO must pre-clear any Transactions by the Compliance Officer. All approvals are recorded under the supervision of the Compliance Officer.

5.3. The Compliance Officer or their designee may, at their discretion, delay or deny clearance for a Transaction without providing a reason. Pre-cleared Transactions not completed within five (5) business days of their approval, must require new pre-clearance.

5.4. Despite this pre-clearance process, each Insider remains responsible for determining whether they possess Insider Information. Pre-clearing a Transaction does not absolve an Insider from potential criminal liability for trading on such information.

6. TRANSACTION REPORTING

6.1. The Company must report to the SIX Swiss Exchange any Transactions in Company Securities conducted by members of the Board, the Executive Committee plus any persons who perform such functions even on an interim basis. This obligation extends to transactions by their Related Persons.

6.2. Each person listed in Section 6.1 must report all Transactions to the Company within two (2) trading days of their execution, regardless of settlement. All such reports are recorded under the supervision of the Compliance Officer.

6.3. Person listed in Section 6.1 who grant a third-party asset manager discretionary authority over their assets must ensure compliance with this reporting obligation by providing the asset manager with appropriate instructions.

6.4. Each Insider who is subject to Transactions provided for under a Trading Plan may be reported either (i) using a single report describing the Trading Plan or (ii) reporting each individual Transaction separately. If the individual Transactions are reported separately, the deadline of two (2) trading days shall commence on execution of the Transaction. If all Transactions to be executed under Trading Plan are indicated in one report, the deadline of two (2) trading days shall commence on conclusion of the Trading Plan. The individual Transactions executed as part of the Trading Plan are no longer required to be reported as a consequence.

6.5. Each person listed in Section 6.1 shall procure that their Related Persons comply with this Policy and the respective reporting obligations under the rules of the SIX Swiss Exchange.

7. BLACKOUT PERIODS

7.1. During defined periods before the public release of annual or interim financial results (each a "**Blackout Period**"), Company staff shall not provide financial information to the investment community, the public, employees, or external advisors, unless specifically authorized by the Compliance Officer. An exception applies for disclosures made on a confidential and need-to-know basis.

7.2. In particular, the Company will not hold meetings with the press, financial analysts, or investors, nor will it issue internal publications or staff announcements on financial matters, without the Compliance Officer's specific authorization. If employees or external advisors require financial information to perform their duties, the Company must inform them of its confidential and sensitive nature and remind them of this Policy.

7.3. Insiders who may have access to financial information about the Company are prohibited from making Transactions in Company Securities during any Blackout Period, in particular during the following Blackout Periods:

a. From the fourth working day in January until twenty-four (24) hours after the announcement of the annual results; and

b. During each three-week period preceding the planned announcement of quarterly or semi-annual results, ending twenty-four (24) hours after such announcement.

The Compliance Officer generally communicates to potential Insiders the Blackout Period in advance and may grant exceptions in justified cases.

7.4. Furthermore, the Compliance Officer may declare an additional Blackout Period for all or selected Insiders if, in their discretion, other Insider Information exists within the Company that would render Transactions by Insiders inappropriate or illegal.

7.5. All Blackout Periods are recorded under the supervision of the Compliance Officer.

7.6. Making Transactions based on Insider Information remains prohibited, irrespective of whether a Blackout Period is ongoing.

8. PRE-ARRANGED TRADING PLAN

8.1. Each Insider may request the Compliance Officer to pre-clear a Trading Plan. Subject to this Section 8, Transactions under a pre-cleared Trading Plan are not deemed a violation of this Policy, even if the Insider is in possession of Insider Information at the time a Transaction is executed or a Transaction is executed within a Blackout Period pursuant to Section 7.

8.2. The Compliance Officer may in its own discretion pre-clear a Trading Plan (or the modification thereof), provided that it meets the following conditions:

a. The Insider must enter into a binding contract or written plan with a brokerage firm, asset manager or other fiduciary that holds discretionary authority over the execution of the Trading Plan;

b. The Trading Plan specifies the amount, price and date on which Transactions with Company Securities are to be made (or a formula for making such determinations);

c. The broker, asset manager or other fiduciary is until termination of the Trading Plan irrevocably instructed or has otherwise agreed to inform the Company directly of any Transactions made in accordance with the Trading Plan;

d. The Trading Plan is established (or modified) at a time when the Insider does not possess Insider Information and no Blackout Period in accordance with Section 7 is ongoing;

e. The Trading Plan prohibits the Insider from later asserting any influence over any person who exercises discretion as to how, when or whether to effect the Transactions set out therein; and

f. The first Transaction under a Trading Plan occurs after a waiting period of 30 days.

All such approvals are recorded under the supervision of the Compliance Officer.

8.3. The Compliance Officer may reject an Insider's Trading Plan or a modification thereof if, in their sole discretion, they feel it will create an undue financial or administrative burden on the Company.

8.4. The Company may at any time request the Insider to immediately suspend or cancel all or part of the Transactions contemplated under the Trading Plan in case such Transaction would be breaching applicable law or would cause material adverse consequences for the Company.

8.5. An Insider may at any time amend or terminate their pre-cleared Trading Plan. After such amendment or termination a cooling-off period of 30 days shall apply during which no Transactions shall be permitted.

8.6. Transactions pursuant to an cleared plan will not require further pre-clearance at the time of the Transaction, but must be reported to the Company as provided in Section 6.4 above.

8.7. Any Trading Plan is the sole responsibility of the person implementing such plan and notwithstanding any pre-clearance of a Trading Plan, the Company, Board members, members of the Executive Committee, the Compliance Officer and other involved officers assume no liability for the consequences of any Transaction made pursuant to such plan.

9. AVOIDANCE OF AGGRESSIVE OR SPECULATIVE TRADING

Insiders and their Related Persons shall not, directly or indirectly, engage in Transactions in Company Securities that, due to their aggressive or speculative nature, could create an appearance of impropriety. Such activities include the following speculative trading practices:

a. Transactions involving options on Company Securities are not permitted. This includes, in particular, buying or selling derivative instruments such as synthetic options, cash-settled options, warrants, or other financial instruments whose value is linked to the Company's share price but which do not result in the actual acquisition or delivery of Company shares. The exercise of employee options remains permitted.

b. Transactions involving leveraged instruments based on Company Securities are not permitted. This includes, but is not limited to, trading on margin, using borrowed funds to increase exposure to Company shares, or engaging in leveraged derivatives such as futures, CFDs, or options with high leverage.

c. Transactions of Company Securities with an interval of fewer than four (4) weeks between purchase and sale are not permitted. This includes day-trading, rapid buying and selling of Company Securities within short time frames, or any pattern of frequent Transactions intended to capitalize on short-term market fluctuations.

10. POST-TERMINATION APPLICABILITY

The obligations under this Policy, particularly the prohibition on conducting Transactions or sharing Insider Information while possessing it, continue to apply to any person after their employment or service relationship with the Company terminates, for as long as they possess such Insider Information.

11. ACKNOWLEDGMENT OF POLICY

Every Insider must review this Policy, which is an integral part of their respective contract with the Company. Questions regarding the Policy should be directed to the Compliance Officer.

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