

CHEMOMAB THERAPEUTICS LTD.

POLICY FOR COMPLAINTS REGARDING ACCOUNTING, INTERNAL ACCOUNTING CONTROLS OR AUDITING MATTERS

1. Introduction

Chemomab Therapeutics Ltd. (the “*Company*”) is committed to full and accurate financial disclosure and to maintaining its books and records in compliance with all applicable laws, rules and regulations. The Company wishes to encourage employees, independent contractors, third-party vendors, customers and business partners to make the Company aware of any practices, procedures or circumstances that raise concerns about the integrity of its financial disclosures, books and records. Therefore, the Company has adopted this policy (the “*Policy*”) to govern the receipt, retention and treatment of complaints regarding the Company’s accounting, internal accounting controls or auditing matters, and to protect the confidential, anonymous reporting (to the extent permitted by applicable law) of employee concerns regarding questionable accounting or auditing matters. This Policy is in addition to the Company’s Code of Business Conduct and Ethics, which describes the policy and procedures for reporting any illegal or unethical behavior.

For purposes of this Policy, an “*Accounting Complaint*” is a complaint about accounting, internal accounting controls, auditing matters or questionable financial practices, including but not limited to complaints of:

- fraud against investors, securities fraud, mail or wire fraud, bank fraud or fraudulent statements to the Securities and Exchange Commission (the “*SEC*”) or the investing public;
- violations of SEC rules and regulations or any other laws applicable to the Company’s financial accounting, maintenance of financial books and records, internal accounting controls and financial statement reviews or audits;
- fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
- significant deficiencies in or intentional noncompliance with the Company’s internal accounting controls;
- misrepresentations or false statements regarding a matter contained in the financial records, financial reports or audit reports of the Company; and
- deviation from the full and fair reporting of the Company’s financial condition.

2. Reporting Accounting Complaints

The Company urges any person desiring to make an Accounting Complaint to contact the Company’s designated compliance officer (the “*Compliance Officer*”), who is currently the

Company's Chief Financial Officer, directly. For persons who wish to report an Accounting Complaint but do not wish to contact the Compliance Officer directly, the Company has established the following four alternative procedures to report an Accounting Complaint:

- A. Telephone Hotline: Any person may call, phone number +972-3 -3-7106555 to report an Accounting Complaint. The phone call will be received by Mr. Yisrael Gewirtz , the Internal Auditor of the Company.
- C. Written Complaints: Any person may report an Accounting Complaint to the Compliance Officer in writing marked CONFIDENTIAL and mailed to the following address: Donald [@chemomab.com](mailto:Donald@chemomab.com) and/or Yisrael.Gewirtz@il.gt.com.
- D. Audit Committee: Any person may report an Accounting Complaint to the Audit Committee directly, in writing marked CONFIDENTIAL and mailed to the chairman of the audit committee, Mr. Joel Maryles at the following address: jymaryles@gmail.com.

Upon receipt of an Accounting Complaint, the Compliance Officer or the Audit Committee, as applicable, will acknowledge receipt to the person reporting the Accounting Complaint if possible.

3. Review and Investigation of Accounting Complaints

Accounting Complaints received by the Compliance Officer or the Audit Committee, as applicable, will be reviewed and investigated either by himself, herself or themselves or by a designated employee, outside counsel, advisor, expert or third-party service provider. If determined to be necessary by the Compliance Officer or the Audit Committee, as applicable, the Company shall provide for appropriate funding to obtain and pay for additional resources that may be necessary to conduct the investigation, including without limitation, retaining outside counsel and/or expert witnesses. Unless otherwise directed by Compliance Officer or the Audit Committee, as applicable, any person assigned to investigate an Accounting Complaint will report his or her findings and recommendations to both the Compliance Officer and the Audit Committee.

Periodically and whenever else requested by the Audit Committee, the Compliance Officer shall submit a report to the Audit Committee (and any member of Company management that the Audit Committee directs to receive such report) that summarizes each Accounting Complaint made to the Compliance Officer within the last twelve months and shows specifically: (i) the complainant (unless anonymous (to the extent permitted by applicable law) in which case the report will so indicate), (ii) a description of the substance of the Accounting Complaint, (iii) the status of the investigation, (iv) any conclusions reached by the investigator and (v) findings and recommendations.

The Audit Committee shall review all Accounting Complaints periodically.

4. Confidentiality and Anonymity of Persons Reporting Accounting Complaints

While the Company prefers that persons reporting Accounting Complaints identify themselves to aid in the investigation, if necessary, reports may be made anonymously if desired, except in countries that have laws that do not allow for anonymous reporting. If requested by the employee

and to the extent permitted by applicable law, the Company will protect the confidentiality and anonymity of an employee who makes an Accounting Complaint to the fullest extent possible, consistent with the need to conduct an adequate review and investigation of the Accounting Complaint.

5. Access to Reports and Records Regarding Accounting Complaints

All reports and records associated with Accounting Complaints are considered confidential information and access will be restricted to the Compliance Officer, the members of the Audit Committee and such other persons reasonably determined by the Compliance Officer or the Audit Committee to require such access.

6. Disclosure of Investigation Results

Accounting Complaints and any resulting investigations, reports or resulting actions will generally not be disclosed to the public except as required by any legal requirements or regulations or by any Company policy in place at the time.

7. Retention of Records

All Accounting Complaints and documents relating to an Accounting Complaint made through the procedures outlined in this Policy shall, subject to applicable law, be retained for at least five years from the date of the complaint, after which time the information may be destroyed unless the information may be relevant to any pending or potential litigation, inquiry or investigation, in which case the information may not be destroyed and must be retained for the duration of that litigation, inquiry or investigation and thereafter as necessary.

Any personal data in an Accounting Complaint that relates to persons based in the European Union or the UK will be retained in accordance with the retention periods set out in the applicable Privacy Notice.

8. No Retaliation

The Company will not discipline, discriminate against or retaliate against any person who reports an Accounting Complaint in good faith and will not tolerate any such action. It will abide by all laws that prohibit retaliation against employees who lawfully submit complaints under these procedures. The Company urges any employee that believes that he or she has been subjected to retaliation due to submitting an Accounting Complaint, to immediately report the issue to the Compliance Officer, an executive officer of the Company or any supervisor. The Company will promptly and thoroughly investigate any assertion that a manager, supervisor or employee is involved in discrimination or retaliation related to reporting of or the Company's subsequent investigation of an Accounting Complaint.

9. Data Protection

The Company operates this Illegal or Unethical Conduct Reporting Procedure (Whistleblowing Policy) in which a person can report an Accounting Complaint through several mechanisms, such as: telephone hotline; written complaint; and audit committee

process. Whilst operating this procedure, we ensure to secure and examine the reliability of the information we get through the reporting of the Accounting Complaint. It is our commitment to ensure that we do so carefully, from the understanding of the sensitivity of the information regarding the persons that are being involved in this situation."

10. Notice to Employees

A notice to the employees of the Company and the Company's affiliates regarding the adoption of this policy will be made using good employee communications practices. These employee communications may differ by jurisdiction, and may comply with local applicable laws on whistleblower procedure communications to employees. Communications will include instructions on the method by which Accounting Complaints may be submitted.

11. Periodic Reviews and Amendments

The Audit Committee will periodically review this Policy. Any amendments to this Policy must be approved by the Audit Committee.