

# Code of Conduct 2023

Our Code of Conduct is a set of guidelines, principles and rules outlining our expected behavior and ethical standards for our stakeholders in Pharma Equity group and its subsidiary Reponex A/S.

Pharma Equity Group has, in accordance with the Danish Financial Statements Act, section 107b, prepared the following report on corporate governance. (Danish: Lovpligtig redegørelse for virksomhedsledelse, jf. årsregnskabslovens § 107 b).

The statement is part of the management report in the company's annual (latest) report for the period 1 January 2023 – 31 December 2023.

## **Supply chain**

Pharma Equity Group's suppliers are an integral part of helping Pharma Equity Group to supply high quality potential therapies to patients. These guidelines document the principles, guidelines and expectations for establishing and maintaining a business relationship with Pharma Equity Group. As from 2025, we therefore expect new suppliers not only to comply with the Code of Conduct for Pharma Equity Group's suppliers in their own organization, but also to ensure in turn that their subcontractors adhere to the international standards summarized in the Code of Conduct for Pharma Equity Group's suppliers.

Pharma Equity Group reserves the right to verify a supplier's compliance with this Code of Conduct.

## **Legal compliance**

Pharma Equity Group considers legal compliance to be one of our primary duties. As part of our corporate responsibility, we also expect this from our suppliers and suppliers must commit themselves hereto.

## **Prohibition of corruption and bribery**

Pharma Equity Group works against all forms of corruption and no contraventions will be tolerated. Pharma Equity Group complies with Danish law on criminal offenses, which regulates this. Employees of Pharma Equity Group must not receive gifts, prejudicial discounts, payments, fees, loans, entertainment, favours or services from suppliers or

external companies which may influence or give the appearance of influencing purchasing decisions. No employee shall do business on behalf of Pharma Equity Group with a close relative or own any financial interest in a supplier's business where the Pharma Equity Group employee has the ability to impact the supplier's relationship with Pharma Equity Group.

Pharma Equity Group expects our suppliers not to tolerate any form of and not to engage in any form of corruption or bribery, including any payment or other form of benefit conferred on any government official for influencing decision making in violation of law.

### **Fair AIR Competition, anti-trust laws and intellectual property rights**

Antitrust laws prohibit agreements between companies that restrict competition, e.g. price fixing, market or customer allocation, market sharing or bid rigging with competitors, or the abuse of a dominant position in the market. Employees of Pharma Equity Group must act in compliance with antitrust laws and expects its contractual partners to do the same. Pharma Equity Group's employees and suppliers must act in accordance with national and international competition laws and will not participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors and will respect the intellectual property rights of others.

### **Conflict of interest**

Pharma Equity Group's employees must act in the best interest of Pharma Equity Group. Accordingly, employees should have no relationship, financial or otherwise, with anyone that conflicts, or appears to conflict, with the employees' obligation to act in the best interest of Pharma Equity Group. Employees must avoid all conflicts of interest that may adversely influence business relationships. This shall also apply to the employees of a supplier.

### **Respect for the basic human rights and employees**

Pharma Equity Group respects the basic human rights of employees as defined in the international conventions of the United Nations (UN), the International Labour Organization (ILO), the Organization for Economic Cooperation and Development (OECD), the UN Global Compact Initiative and Danish Labour legislation.

Pharma Equity Group expects its suppliers to respect the basic human rights of their employees as defined in the international conventions of the United Nations (UN), the International Labour Organization (ILO), the Organization for Economic Cooperation and Development (OECD) and the UN Global Compact Initiative. This means that a supplier must

e.g.: (1) respect the personal dignity, privacy and rights of each employee and (2) comply with the maximum number of working hours laid down in the applicable laws.

### **Prohibition of child labour**

Pharma Equity Group will not employ workers under the age of 15 and will comply with Danish Labour legislation related hereto. Pharma Equity Group expects its suppliers to only employ workers with a minimum age of 15.

### **Health and safety of employees**

Pharma Equity Group is following national Labour legislation with regards to minimum requirements for health and safety of Pharma Equity Group's employees. Pharma Equity Group has established a safety/work environment organization, which reviews, instructs and measures according to the criteria in the Danish Labour legislation.

We expect our suppliers to be compliant and follow national Labour legislation with regards to the health and safety of their employees and control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases.

### **Environment protection**

The objective of environmental protection is to improve the market opportunities for our products and the esteem in which our customers and the public hold us, by increasing the environmental compatibility and ecological efficiency of the products themselves as well as the production processes. This can only be achieved in partnership with our suppliers.

Pharma Equity Group will act in accordance with the applicable statutory and international standards regarding environmental protection and we expect our suppliers to do the same.

### **Conflict minerals**

Pharma Equity Group will avoid in its products the use of raw materials which directly or indirectly finance armed groups who violate human rights and we expect our suppliers to do the same.

**Animal welfare**

Pharma Equity Group respects animal welfare. Pharma Equity Group expects suppliers to respect animal welfare and comply with national legislation related hereto.

**Human tissue**

It is essential for Pharma Equity Group that material derived from humans comply with applicable laws and regulations regarding the procurement, use and storage of human tissues. Pharma Equity Group complies with Danish legislation related hereto and Pharma Equity Group's suppliers are expected to comply with any national legislation in their country.