

## **Code of Conduct**

### **Pharma Equity Group A/S and Reponex Pharmaceuticals A/S**

This Code of Conduct sets out the principles, guidelines and expectations for responsible conduct in Pharma Equity Group A/S, its subsidiary Reponex Pharmaceuticals A/S, and, where relevant, the Group's suppliers and business partners.

The purpose of this Code of Conduct is to support a culture of integrity, accountability and responsible business conduct across the Group and in our external relationships. The Code reflects the standards that we seek to apply in our operations, decision-making and collaboration with stakeholders.

Pharma Equity Group operates with a focused and lean organisation and is committed to maintaining clear standards for lawful, ethical and responsible conduct. We expect employees, management, Board members, suppliers and relevant business partners to act in a manner consistent with the principles set out in this Code of Conduct.

### **Scope**

This Code of Conduct applies to:

- Pharma Equity Group A/S
- Reponex Pharmaceuticals A/S
- employees, management and Board members within the Group
- suppliers, subcontractors and business partners, where relevant to the nature of the relationship

Suppliers are expected not only to comply with the principles set out in this Code of Conduct in their own organisation, but also, where relevant, to promote similar standards in their supply chain and among subcontractors.

Pharma Equity Group reserves the right to request relevant information and documentation in order to assess whether a supplier or business partner acts in accordance with the principles set out in this Code of Conduct.

### **Legal compliance**

Compliance with applicable laws and regulations is a fundamental requirement in all activities of the Group. Pharma Equity Group expects all employees, suppliers and business partners to comply with relevant national and international laws and regulations applicable to their activities.

### **Anti-corruption and anti-bribery**

Pharma Equity Group has zero tolerance for corruption and bribery in any form.

Employees, management and Board members must not offer, promise, give, request or accept any improper advantage, payment, gift, benefit or service that may influence, or appear to influence, business decisions or professional judgement.

Employees must avoid situations where personal interests may conflict, or appear to conflict, with the interests of Pharma Equity Group.

Pharma Equity Group expects suppliers and business partners not to tolerate, engage in or facilitate any form of corruption or bribery, including improper payments or benefits to public officials or private counterparties.

### **Fair competition and respect for intellectual property rights**

Pharma Equity Group is committed to fair competition and compliance with applicable competition and antitrust laws.

Employees, suppliers and business partners must not engage in unlawful anti-competitive conduct, including price fixing, market sharing, customer allocation, bid rigging or abuse of a dominant position.

Pharma Equity Group also expects all parties acting on its behalf or in cooperation with the Group to respect the intellectual property rights of others.

### **Conflicts of interest**

Employees and representatives of Pharma Equity Group must act in the best interests of the Group and must avoid conflicts of interest that may compromise, or appear to compromise, their objectivity or professional judgement.

Any actual or potential conflict of interest must be disclosed and handled appropriately.

Pharma Equity Group expects suppliers and business partners to apply similar standards in their own organisations.

### **Respect for human rights and labour standards**

Pharma Equity Group respects internationally recognised human rights and expects the same from suppliers and business partners.

This includes respect for the dignity, privacy and rights of individuals and a commitment to fair and lawful working conditions.

Pharma Equity Group supports principles reflected in internationally recognised frameworks, including relevant conventions and standards of the United Nations, the International Labour Organization and the OECD.

Suppliers and business partners are expected to maintain working conditions that comply with applicable laws and to treat employees with respect and fairness.

### **Prohibition of child labour**

Pharma Equity Group does not accept child labour and expects suppliers and business partners to comply with applicable laws and internationally recognised standards relating to minimum working age.

### **Health and safety**

Pharma Equity Group is committed to providing a safe and healthy working environment and to complying with applicable health and safety requirements.

Suppliers and business partners are expected to manage health and safety responsibly, identify and control relevant risks, and take reasonable steps to prevent accidents, injuries and occupational illness.

### **Environmental responsibility**

Pharma Equity Group seeks to act responsibly in relation to the environment and expects suppliers and business partners to do the same.

The Group aims to comply with applicable environmental laws and standards and to support responsible practices in its operations and value chain. Given the nature of the Group's activities and operating model, environmental responsibility is primarily addressed through sound operational choices, collaboration with responsible partners and ongoing attention to relevant environmental impacts.

### **Conflict minerals**

Pharma Equity Group seeks to avoid the use of raw materials that directly or indirectly finance armed groups or contribute to serious human rights violations and expects suppliers and business partners to apply similar principles where relevant.

### **Animal welfare**

Pharma Equity Group respects animal welfare and expects suppliers and business partners to comply with applicable laws and standards relating to animal welfare where relevant to their activities.

### **Human tissue and biological material**

Where the Group's activities involve human tissue, biological material or related processes, Pharma Equity Group is committed to compliance with applicable laws, regulations and ethical standards relating to procurement, use, handling and storage.

Suppliers and business partners involved in such activities are expected to comply with applicable legal and ethical requirements in their relevant jurisdictions.

### **Reporting concerns**

Pharma Equity Group expects concerns regarding serious misconduct or breaches of applicable law or this Code of Conduct to be raised through relevant internal channels.

The Group is continuously evaluating how to strengthen its framework for responsible conduct and reporting of concerns in line with its size, development and governance framework.

### **Implementation and follow-up**

This Code of Conduct forms part of Pharma Equity Group's broader governance framework and is intended to support clear expectations for conduct across the Group and in stakeholder interactions.

The Group may update this Code of Conduct from time to time to reflect developments in the business, governance framework, stakeholder expectations and applicable requirements.