

Data Ethics Policy

Statutory statement on data ethics pursuant to section 99 d of the Danish Financial Statements Act

This statement on data ethics is prepared pursuant to section 99 d of the Danish Financial Statements Act and covers the financial year 1 January - 31 December 2025.

Pharma Equity Group A/S (“PEG”) recognises that responsible handling of data is an important element of good governance, trust and long-term value creation. PEG’s approach to data ethics reflects the Company’s size, current activity profile and organisational structure.

PEG’s activities are currently focused on corporate development, financing activities, portfolio management and the development of pharmaceutical assets through its subsidiary Reponex Pharmaceuticals A/S. In this context, PEG’s use of data is limited compared to larger operational or consumer-facing businesses. Nevertheless, PEG considers it important that data is handled responsibly and in accordance with applicable legal and ethical standards.

PEG’s approach to data ethics is based on the following principles:

Responsible handling of data

PEG seeks to process and handle data responsibly, securely and in accordance with applicable legislation. This includes an awareness of confidentiality, integrity and appropriate access to data in relevant business processes and stakeholder interactions.

Compliance with applicable rules and standards

PEG aims to comply with applicable data protection rules and other relevant legal requirements relating to the handling, storage and use of data. The Company’s approach to data ethics is aligned with its broader governance framework and internal policies.

Proportionality

PEG applies a proportionate approach to data ethics based on the Company’s size, organisational structure and nature of activities. The Company does not currently engage in extensive large-scale processing of personal data, automated profiling or similar data-driven activities that would require a more extensive standalone data ethics framework.

Governance and oversight

The Board of Directors and Executive Management assess the Company’s governance framework on an ongoing basis, including whether additional policies or procedures relating to data ethics should be introduced as the Company develops. Data ethics is viewed as part of the Company’s broader governance and risk awareness framework.

Ongoing development

PEG will continue to assess whether its activities, systems or stakeholder expectations give rise to a need to further develop its approach to data ethics. As the Company evolves, the Board of Directors and Executive Management may decide to formalise additional policies, procedures or controls in this area.

PEG has chosen to publish this statutory statement on data ethics on the Company's website in accordance with section 99 d of the Danish Financial Statements Act.