

## Modern Slavery Statement

This Statement is made by Abacus Medicine A/S on behalf of itself and all companies in the Abacus Medicine Group, including Abacus Medicine Ltd. and Abacus Medicine Pharma Services Ltd., which carry out business in the UK (collectively referred to as “Abacus Medicine”).

This Statement is made pursuant to the UK Modern Slavery Act 2015 section 54. Abacus Medicine is committed to prevent modern slavery and human trafficking in our business and in our supply chains. This statement relates to actions and activities during the financial year (1<sup>st</sup> of January 2023 – 31<sup>st</sup> of December 2023).

Abacus Medicine does not tolerate slavery and human trafficking in our business or supply chain. We are committed to acting ethically and with integrity in all of our business dealings and relationships. We hold ourselves to the highest standards by implementing and enforcing effective systems and controls to ensure that any form of slavery is not taking place in our own business or supply chains.

Abacus Medicine’s commitment to respecting human rights is anchored in Abacus Medicine’s Human Trafficking, Slavery and Child Labour (Modern Slavery) Policy which applies for all employees of Abacus Medicine and its subsidiaries, and in Abacus Medicine’s Supplier Code of Conduct which applies for all external medicinal suppliers and third party logistic providers.

### **Structure, business and supply chains**

#### Structure and business

Abacus Medicine is a parallel importer and distributor of original medicine, medical devices, generics and other related services within the pharmaceutical industry. Abacus Medicine operates in a life-critical business where trust is non-negotiable. Our ultimate parent company for the Abacus Medicine Group is Abacus Medicine A/S which has its headquarters in Denmark.

As per 31<sup>st</sup> of December 2023, the Abacus Medicine Group consists of 32 legal entities of which a great amount conduct business in the UK.

#### Supply chains

Abacus Medicine works with a large number of suppliers – more than 250 for medicines alone. Our suppliers are vital to our business, just as Abacus Medicine is vital to the business of many suppliers.

Customer and supply chain relations hold a unique position in the parallel distribution industry where demand always exceeds supply. Abacus Medicine seeks loyal, long-term partnerships with our business partners. Abacus Medicine believes in the principle of growing together.

### **Policies concerning Modern Slavery and Human Trafficking**

At Abacus Medicine, we do not tolerate any inhumane behaviour. Steps have been taken within our organisation to prevent modern slavery and human trafficking in our business and supply chain.

Abacus Medicine has a Supplier Code of Conduct for medicinal suppliers, which is overseen by a competent Sustainability Steering Committee. We operate with the following policies to prevent modern slavery and human trafficking in our business and supply chain.

- A Human Trafficking, Slavery and Child Labour (Modern Slavery) Policy
- A Supplier Code of Conduct for medicinal suppliers
- A Whistleblower Policy
- An Anti-Corruption & Conflict of Interest Policy

All policies within the business, including the above, are authorised, reviewed and processed by the Legal Department, representatives from the Executive Management Team and the Board of Directors 29 August 2023

### **Supplier risk assessment and due diligence processes within our business and supply chain**

All medicinal suppliers and business partners are subject to our Supplier Code of Conduct in which it is stipulated that any potential issues shall be identified, appropriately investigated and remedial actions taken against.

At Abacus Medicine, we strive to make sure that both we and our medicinal suppliers work thoroughly on standards of behaviour to ensure no violation of human rights. We expect all our suppliers to comply with international human rights, and we do not tolerate exploitative, inhumane labour practices. We expect our suppliers to undertake and comply with our Supplier Code of Conduct. We expect them to comply with the principles and to assess their vulnerabilities when it comes to upholding the principles set out in the Supplier Code of Conduct.

Abacus Medicine has a zero-tolerance position on violations to the UK's Anti-Human Trafficking and Anti-Modern Slavery laws. Our biggest exposure to modern slavery is

in our global supply chain, where we are working with our suppliers to minimise the risk of modern slavery.

All employees are representatives of Abacus Medicine and are therefore all expected to carry out continuous due diligence when visiting external suppliers. We work with global leaders within the worldwide supply chain, and they all have extensive policies regarding human rights and modern slavery.

Abacus Medicine undertakes due diligence processes which ensure that we are able to identify and address any adverse impact of our business as well as in our supply chain. Abacus Medicine outlines such due diligence and business risks in the annual Sustainability Report.

By virtue of our business, we conduct regular audits and visits to medicinal suppliers. We review our supply chain on a regular basis and constantly consider how to improve our own practices with a greater degree of focus on slavery and human trafficking.

All new employees at Abacus Medicine are required to read and understand the company's Compliance Framework, in which our principles on slavery and human trafficking are explained.

To minimise our adverse impacts in our own operations and within our business, we strive to ensure that if a risk is identified, we assess the level of that risk and take steps to prevent, monitor and mitigate it. The Supplier Code of Conduct for medicinal suppliers, the due diligence when engaging in a relationship with suppliers and the continuous audits of suppliers sets out efficient steps to prevent violation of human rights and modern slavery in our business and supply chain.

#### **Key performance indicators to measure effectiveness of steps being taken**

We log complaints received through our whistleblower channel or through other sources, together with the actions taken. To the date of this statement, Abacus Medicine has not identified any instances of modern slavery.

#### **Training to prevent modern slavery**

To ensure a high level of understanding of the impact of our business activities in our supply chains, we provide training to our employees in certain positions and functions. All employees in Abacus Medicine have completed compliance training for 2023, including training on modern slavery. We do this to ensure that the relevant employees have thorough knowledge of our policies and procedures and are able to act accordingly.



All new medicinal suppliers and third party logistic providers are introduced to Abacus Medicine's Supplier Code of Conduct.

As addressed in our Supplier Code of Conduct, we expect our business partners to follow the principles set out in the Supplier Code of Conduct, and we also urge our business partners to provide training to their employees and suppliers.

Approved by CEO Flemming Wagner