

Compliance Framework



ABACUS MEDICINE GROUP

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Introduction

The Abacus Medicine Group Compliance Framework serves as a guide to the principles and guidelines that shape our organisation’s culture and practices. Its purpose is to provide clear and accessible guidance on Abacus Medicine Group’s policies on:

- Ethics and Values
- Trade and competition compliance
- Business integrity
- Working environment and human rights
- IT security and data ethics
- Data privacy

Scope

The Policies apply to the Abacus Medicine Group, including its subsidiaries, affiliates, and branches (hereinafter “Abacus Medicine”) and all employees, representatives and board members of Abacus Medicine, regardless of permanent or temporary employment or volunteering.

All employees and representatives are obliged to familiarise themselves with the Compliance Framework and respect the principles outlined herein. All employees and representatives are obliged to report any evidence or suspicion of breach of the Policies to their immediate manager, the Legal Department or through the company’s Whistleblower Channel.

It is the responsibility of each manager to ensure that the Compliance Framework is understood and followed by all employees and representatives within their respective area of responsibility. Managers and employees are advised to revisit the Compliance Framework at least once every year.

Purpose

Abacus Medicine is a distributor of original medicine, medical devices, generics, and other related services within the pharmaceutical industry.

We operate in a life-critical business where trust is non-negotiable.

Our success relies on the confidence our stakeholders have in us, and each and every one of us has a critical role in building and maintaining this trust.

It is therefore critical to the success of Abacus Medicine that each employee or representative adheres to the Policies of the Compliance Framework.

Accessibility

The Compliance Framework is accessible to all employees through Access, the company intranet, to ensure its availability to everyone. Abacus Medicine will notify

employees of any changes or updates and provide them with the necessary training and ways to seek advice and report any concerns anonymously.

The Compliance Framework is an annex to all new contracts of employment and is introduced to all new employees as part of the onboarding program.

Adherence

If an employee or representative violates the Policies, it may lead to disciplinary measures or termination of their employment with Abacus Medicine or position as representative of Abacus Medicine.

If you have questions

Employees are always welcome to bring any questions directly to the Legal Department or have a manager pass on the questions.

Concerns can be reported in the following ways:

- **Bringing the concern to the attention of an immediate manager who will be responsible for reporting such concern to the Legal Department; or**

- **Contact the Legal Department directly.**

Definitions

“Employee(s) and Representative(s)” shall mean all employees, representatives, consultants, board members, contractors, agents, distributors, joint venture partners, or other business associates retained by the Abacus Medicine Group who interact on behalf of the Abacus Medicine Group.

“Applicable Law” shall mean the collective body of international, regional, national, and local laws, regulations, rules, guidelines, and industry codes that are relevant to and govern the activities of Abacus Medicine.

Ethics & Values

Ethics at Abacus Medicine

Our Purpose and values

At Abacus Medicine, we are innovative, dedicated, and we care. We improve global healthcare through better access to medicine.

Throughout its existence, Abacus Medicine has achieved significant growth while remaining profitable.

This allows us to pay taxes and provide more than one thousand jobs with attractive remuneration, thus securing livelihoods for families in several countries. We are happy to fulfil our tax obligations and have formulated a Group Tax Policy to ensure that we pay our fair and equitable share of taxes in the geographies where we operate.

We have job opportunities for people of all levels of education and skills, including people with disabilities. We provide internal training and support for necessary education.

As an employer, we are proud of our tradition of hiring young people and empowering them from the start. We offer a working environment where talented people can challenge themselves and grow, and this makes Abacus Medicine able to regularly attract candidates from the leading institutions of higher education.

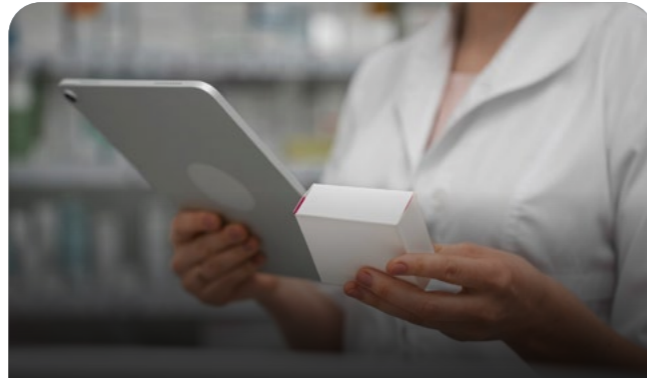
Abacus Medicine is a young company with a young workforce, and we value an entrepreneurial mindset and the courage to do things differently. This ethos, however, is never in conflict with our dedication to quality and compliance.

Principles we follow

At Abacus Medicine, we are subject to the strict regulations of the pharmaceutical supply chain. We welcome this and work with the highest level of quality assurance throughout our processes. We recognize that our responsibilities may extend even beyond the letter of the law. We wish to be recognized as a company that acts in a fair and ethical manner.

Abacus Medicine's Ethics principles defines how we want to conduct our business in relation to society as a whole, to our customers and business partners, and to our fellow colleagues. It sets the standard for how we conduct ourselves on a daily basis.

Not every situation that may arise is covered by this Ethics policy guide or the Compliance Framework. Guidance in uncertain situations can often be found in internal SOPs, policies, and rules, but not always. In situations of uncertainty, employees and representatives are encouraged to seek advice from managers or relevant specialists, and our Ethics principles shall serve as guidance during such times.



Values in Action: Active in the battle against counterfeit and falsified medicines:

Falsified and counterfeit medicines are a serious and unfortunately increasing problem. Abacus Medicine is an active participant in the fight against these falsified and counterfeit pharmaceutical products.

- Abacus Medicine has developed and implemented its own risk-based approach, combining internal controls with regular audits of suppliers and transporters.
- Abacus Medicine conducts tailor-made training programs with selected suppliers to bolster the first line of defence. Abacus Medicine trains employees and its suppliers in techniques to screen and ultimately reject suspicious products before they enter its supply chain.
- In line with the rest of the pharmaceutical industry, Abacus Medicine has invested considerable resources in the measures implemented by the EU's Falsified Medicines Directive to ensure the safe of the medicine supply-chain.



Abacus Medicine's commitments to our stakeholders

External Relations, Authorities and Audits:

- a. As a distributor of pharmaceutical products, Abacus Medicine is subject to strict regulations and is regularly inspected by authorities and business partners. Abacus Medicine carries out detailed quality assurance, and always welcomes and collaborates in audits demonstrating its compliance with the rules to authorities and business partners.
- b. Abacus Medicine maintains positive working relations with regulators and policy makers. We regularly serve as a well-informed conversation partner regarding the market conditions shaping our industry.

Supplier Relations:

- a. 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 of our suppliers.
- b. A Supplier Code of Conduct has been implemented, which sets the standards for our suppliers not only to live up to our quality standards but that they also conduct their business in an ethical manner, treat their employees well, and support the environment.

- c. A significant number of our medicinal suppliers and transporters have accepted our Supplier Code of Conduct, whilst our goal is to get confirmation from the rest of our suppliers in 2023.
- d. We seek loyal, long-term partnerships with our business partners. We believe in the principle of growing together, and we will do our utmost to offer a steady, continuous order flow in a market where prices may fluctuate.

Customer Relations:

- a. Customer relations hold a unique position in the parallel distribution industry where demand always exceeds supply. At Abacus Medicine, we seek to be not just a supplier of products, but a business partner for long-term growth.
- b. We value a high level of openness and transparency in the dialogue with our customers. Since we operate in multiple European countries, we are often able to offer our customers a wider perspective with insights and best practices from other markets.



Sustainability Policy

The Abacus Medicine Group is committed to conducting business in an environmentally, socially and economically conscious manner.

Purpose

As our company grows, so does our societal impact. We recognize our obligation to our stakeholders and to the wider society.

We insist on a close link between our core business and our sustainability efforts, and we are firmly committed to the concept of materiality. We want to do better, where it really matters.

This Sustainability Policy outlines the key concepts and the accompanying Governance structure of sustainability in the Abacus Medicine Group.

We report on our progress regularly and publish an annual Sustainability Report on abacusmedicine.com.

This Sustainability Policy of the Abacus Medicine Group is rooted in the 17 UN Sustainable Development Goals with an emphasis on goal #3: Good Health and Well-being.

These general guidelines are subsequently adapted into specific goals and action plans reflecting the actual business practices of the Abacus Medicine Group.

Ethics Questions to Consider when in Doubt

If an employee has doubts whether a decision is a good idea, the questions below must be considered and eventually the team manager must be consulted:

- a. Is it in compliance with statutory law?
- b. Does it feel right?
- c. Is it against Abacus Medicine's standards or our policies?
- d. Is there a risk of a negative impact on you or Abacus Medicine?
- e. Could anyone else be affected by this (employees in Abacus Medicine, customers, suppliers, etc.)?
- f. Would you be embarrassed if anyone else knew that you took this course of action?
- g. Is there an alternative action that does not pose an ethical conflict?
- h. What would a reasonable person think?
- i. What would it look like in the media?

Questions and concerns

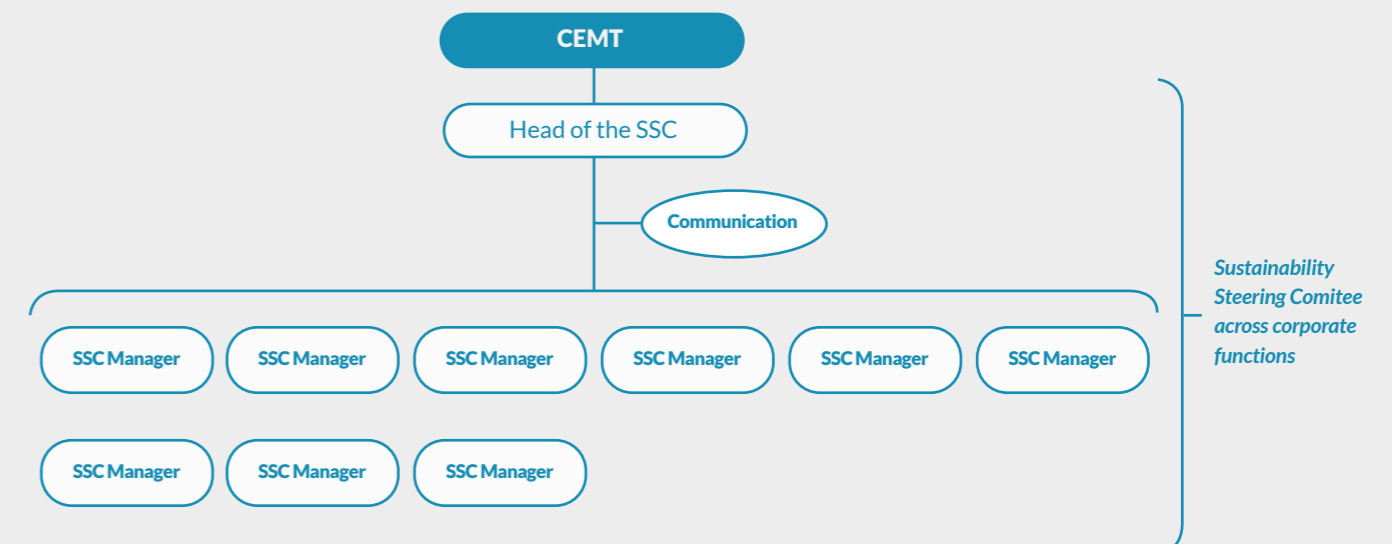
Employees and Representatives are encouraged to bring any questions about this Policy directly to the Legal Department or to have a manager pass on the questions.

All Employees and Representatives are obliged to familiarise themselves with this Policy and respect the principles herein, as well as reporting any evidence or suspicion of breach of this Policy to their immediate manager, the Legal department or through Abacus Medicine's Whistleblowing Scheme.

Violations

Violation of this Policy may lead to disciplinary measures or termination of the offender's employment with Abacus Medicine.

Governance Structure



Sustainability Steering Committee

Sustainability in the Abacus Medicine Group is organized to connect strategy with daily operations and is governed at Senior Management level through the Sustainability Steering Committee. The Sustainability Steering Committee sets the strategy for our work with sustainability and agrees on the yearly Focus Programs.

The Focus Programs represent the projects we work with throughout the year and each Focus Program has specific goals and a separate action plan. Specific KPIs and action plans are agreed for each Focus Program every year. The number of Focus Programs may change from year to year.

The Sustainability Steering Committee consists of the Head of the SSC, the Communication Team, and SSC Managers from across corporate functions. The Head of the Sustainability Steering Committee manages and oversees the committee and programs and is responsible for the communication with the CEMT and Board of Directors. The SSC Managers can appoint Project Managers who lead the daily operations of the Focus Program in question.

Communications Team

The Communications Team is responsible for internal and external communication and reporting of everything related to the work and functioning of the Sustainability Steering Committee.

SSC Managers

The SSC Managers will in collaboration divide focus programs among themselves in relation to where the relevant skills and knowledge lie.

SSC Managers are responsible for the functioning of their assigned focus program(s) as well as the overall results or lack thereof.

If you wish to explore the specific sustainability contributions of Abacus Medicine, please see our annual Sustainability Report which can be found on the Abacus Medicine website.

Approved by the Board of Directors on 29 August 2023.



Goal #3: Good Health and Well-Being, including:



Target 3.8: "Achieve universal health coverage (UHC), including financial risk protection, access to quality essential health care services, and access to safe, effective, quality, and affordable essential medicines and vaccines for all"



Goal #8: Decent Work and Economic Growth, including:



Target 8.5: "by 2030 achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value"



Goal #12: Responsible Production and Consumption, including:



Target 12.5: "by 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse"



Target 12.6: "encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle"

Whistleblower Policy

Abacus Medicine has established a Whistleblower Scheme in order to allow reporting of potential violations of laws and serious violations of internal policies and procedures.

Purpose

The Whistleblower Scheme is not intended to replace, limit, or supersede the existing internal communication paths of Abacus Medicine. It serves as an alternative to the ordinary reporting of potential irregularities to Abacus Medicine's Management or Board of Directors.

It is the intention that reporting can be made about concerns regarding serious issues and/or related acts or omissions made by partners or employees of Abacus Medicine, members of Management, or others related to Abacus Medicine.

Reporting under this Whistleblower Policy is voluntary and can be done on an anonymous basis. This Whistleblower Policy is set up to provide Whistleblowers with the protection established by the Whistleblower Directive 2019/1937.

Types of concerns which may be reported

The types of concerns which may be raised using the Whistleblower Scheme are serious and sensitive concerns that could have an adverse impact on the operations and performance of Abacus Medicine's business, employees, and other people interacting with the company. Concerns can

be reported about any individual legal entity in the Abacus Medicine Group. This includes, without limitation, concerns regarding:

- a. Money laundering, bribery, or corruption;
- b. Fraud (e.g. financial fraud, document fraud, or embezzlement);
- c. Serious violations of internal policies and procedures;
- d. Breaches of European Union law;
- e. Financing of terrorism;
- f. Any violation of law, the Compliance Framework or any other material concern; or
- g. The life or health of individuals, deficiencies as regards security in the workplace, discrimination or harassment, or other irregularities of a general or operational nature, such as endangerments concerning the vital interests of Abacus Medicine.

Who can file a report?

All past and present employees and partners of Abacus Medicine can file a report about concerns under this Whistleblower Policy.

Anonymity

This Whistleblower Policy, and the structures of the Whistleblower Scheme, are set up to support and safeguard the option to report anonymously and allow a Whistleblower to remain anonymous throughout the process. The IT platform used for sending and receiving reports involves multiple control measures to ensure anonymity and protection of confidentiality.

The anonymity of Whistleblowers opting to submit anonymous reports will be preserved when using the Whistleblower Scheme, ensuring that their identities remain unknown.

The Whistleblower Committee is obligated to maintain strict confidentiality and is prohibited from disclosing the identities of Whistleblowers who choose to report non-anonymously, as well as the content of any reports submitted without the Whistleblower’s consent, except where necessary to address suspected breaches of law.

The Whistleblower may make the report anonymously and the report should preferably be made in English. The Whistleblower can choose to establish a communication channel through the Whistleblower Portal. The communication channel allows the Whistleblower Committee to ask clarifying questions during an investigation without compromising the Whistleblower's anonymity.

Investigation

The investigation is conducted by the Whistleblower Committee in accordance with the Rules of Procedure of

the Whistleblower committee. All reports are screened for potential conflicts of interest. In case of a conflict of interest, the concerned member of the Whistleblower Committee will step down.

Care is taken during investigations of the Whistleblower Reports to ensure that all concerns are examined thoroughly, on a case-by-case basis, and within an appropriate timeframe. If the concern received is deemed within the purpose of this Whistleblower Policy, an investigation of the concern will be conducted, and all necessary actions and preventive measures will be taken. A written report outlining the results of the investigation and the measures taken will be sent to the members of the Board of Directors and the Audit Committee.

Notification of parties involved

Whistleblowers who create a communication channel or provide contact details will receive a confirmation of receipt of the report within seven days and will receive feedback on the report no later than three months from making the report. As soon as reasonably possible, the person(s) whose behaviour has been reported shall be notified of the main object of the reported concern to allow that person to present objections.

No retaliation

All Whistleblowers are protected from any kind of retaliation or discriminatory or disciplinary action which causes or may cause unjustified detriment to the Whistleblower, including but not limited to discharge, demotion, suspension, threats, reduction in wages, intimidation, coercion, unfair treatment, or any other kind of harassment. Any such retaliation against a Whistleblower is considered a serious breach of this Whistleblower Policy. However, such protection shall not apply if the Whistleblower maliciously makes demonstrably false allegations.



How to report

In order to facilitate confidentiality of concerns covered by this Whistleblower Policy, the person intending to make a report (the “Whistleblower”) is to report it via the Whistleblower Portal.

– In order to stay anonymous and avoid any potential tracking from the website when reporting, the URL below must be copied into a new browser window.

– Link to the Whistleblower Portal: <https://abacusmedicine.whistleblownetwork.net>.

Whistleblowers making reports within the scope of the Whistleblower Directive, as implemented into national law, will benefit from additional legal protection under this directive.

Deletion of Whistleblower reports

Subject to other requirements under local law, the collected information will be deleted:

- a. immediately, if the report is beyond the purpose of the Whistleblower Policy or should prove unfounded or if no internal action is made in relation to the concern;
- b. right after the closing of the case by the authorities, if a report is filed with the police or other relevant authorities;
- c. 2 (two) months after the investigation has been completed, if no further action is taken; or
- d. at the latest, 5 (five) years after the time of the employee’s departure, if disciplinary sanctions are made towards the reported employee on the basis of the collected information, or other reasons for it being factual and necessary to continue storing the information. The collected information will be stored in the personnel folder in question.

Questions and Concerns

Employees and representatives are always encouraged to bring any questions about this Policy directly to the Legal Department or have a manager pass on the questions.

All employees and representatives are obliged to familiarise themselves with this Policy and respect the principles herein, as well as reporting any evidence or suspicion of breach of this Policy to their immediate manager, the Legal Department or through Abacus Medicine’s Whistleblower Scheme.

Violations

Violation of this Policy may lead to disciplinary measures or termination of the offender’s employment with Abacus Medicine.

Approved by the Board of Directors on 26 November 2024.

Trade & Competition Compliance

Trade Sanctions Policy

Abacus Medicine is committed to fair and ethical business practices throughout its entire business operations. Part of this commitment is to ensure that Abacus Medicine complies with applicable law on trade sanctions and restrictive measures.

Purpose

The purpose of this Trade Sanctions Policy is to provide guidelines and procedures to identify and manage risks related to trade sanctions and restrictive measures administered by:

- the EU-Commission;
- the United Kingdom's Foreign, Commonwealth & Development Office;
- the United Nations Security Council; and
- the US Office of Foreign Assets Control (collectively, the "Trade Sanction Laws").

All employees of Abacus Medicine must conduct their activities in full compliance with this Policy and any and all applicable Trade Sanction Laws.

The following activities are prohibited under this Policy:

- a. Engaging in any business or dealings with Embargoed Countries, Blocked Persons, Individuals or Entities listed as sanction targets under Trade Sanction Laws; or
- b. Facilitating transactions with third parties involving Embargoed Countries, Blocked Persons, Individuals or Entities listed as sanction targets under Trade Sanction Laws.

These prohibitions cover direct and indirect business transactions and dealings. In practice, this prohibits Abacus Medicine from trading or making dealings with third parties for supply to a Sanctions target.

Trade Sanctions are governmental instruments intended to restrict trade and financial transactions with certain countries or individuals. Trade Sanctions prohibit entities from engaging in business activities with persons, countries, and legal entities which have been listed as Sanction Targets.



How to Transact or Trade with a sanctions Target

It is possible to transact or trade with a Sanctions Target, if:

- a. the transaction is subject to an exemption issued by the competent governmental authority; or
- b. Abacus Medicine has been granted a specific licence by the competent governmental authority.

It should not be assumed that a transaction is permissible pursuant to an exception or licence without consulting Management, the Legal Department and this Policy in advance.

Compliance Procedures

Abacus Medicine shall actively ensure that the employees:

- a. Have access to this policy and;
- b. Will act in good faith to comply with this policy.
- d. Are provided with training on Trade Sanctions.

Throughout the fiscal year, the company will perform periodic internal audits of financial transaction. The findings will be summarized in a report submitted to the management on an annual basis.

Questions and Concerns

Employees and representatives are always encouraged to bring any questions about this Policy directly to the Legal Department or have a manager pass on the questions.

All employees and representatives are obliged to familiarise themselves with this Policy and respect the principles herein, as well as reporting any evidence or suspicion of breach of this Policy to their immediate manager, the Legal Department or through Abacus Medicine's Whistleblowing Scheme.

Violations

Any Violation of this Policy may lead to disciplinary measures or termination of the offender's employment with Abacus Medicine.

Approved by the Board of Directors on 26 November 2024.

Fair Competition Policy

At Abacus Medicine, we are committed to conducting our business in a manner that supports open and fair competition in accordance with applicable competition law and regulations.

Purpose

This Fair Competition Policy serves as a guideline for employees and representatives of Abacus Medicine, outlining how to conduct business in accordance with the law. It applies to the entire Abacus Medicine Group and extends to all employees and representatives.

Prohibition against cartels and collusion

Abacus Medicine strictly prohibits any involvement in cartels or anti-competitive agreements with competitors. Competition law is established to protect consumers by requiring companies to act independently of each other, thereby ensuring a competitive market. Employees and Representatives must not engage in discussions or agreements with competitors related to:

- Pricing
- Coordination of bids, e.g., on public tenders
- Production or supply levels
- Market or customer allocation
- The exchange of confidential information or any other information that may lead to coordinated behaviour

These rules apply to both written and oral agreements.

Working with competitors

When collaborating with or providing services to competitors, employees must ensure that the Legal Department is involved in order to ensure that cooperation and any agreements made are in compliance with applicable law.

Guidelines for Interaction with Competitors

Abacus Medicine and its employees often engage with different parties, at trade associations, medical fairs, and other events, which requires careful consideration of the information shared and how interactions take place. Abacus Medicine's employees must be cautious when dealing with competitors, especially in tender processes, to avoid any appearance of participating in anti-competitive activities.

It is important to note that an improper discussion without actually entering into an agreement can cause a breach of competition law. If you find yourself in a discussion involving competitors where anti-competitive behaviour is discussed, you must immediately remove yourself from the situation and unequivocally reject or decline the proposed actions. It is important to document the concern and consult your immediate manager and the Legal Department.

Prohibition on Abuse of Dominance

Anti-competitive conduct can also arise when Abacus Medicine holds a dominant position in the market. It is prohibited for companies with a dominant market position to abuse their power, such as charging unfair prices, limiting production, or refusing to supply. Abacus Medicine does not currently hold a dominant position, but will continuously monitor our position in the market and remain aware of market mechanisms that may result in such market power for certain products.

Questions and Concerns

Employees and representatives are always encouraged to bring any questions about this Policy directly to the Legal Department or have a manager pass on the questions.

All employees and representatives are obliged to familiarise themselves with this Policy and respect the principles herein, as well as reporting any evidence or suspicion of breach of this Policy to their immediate manager, the Legal Department or through Abacus Medicine's Whistleblowing Scheme.

Violations

Violation of this Policy may lead to disciplinary measures or termination of the offender's employment with Abacus Medicine.

Approved by the Board of Directors on 26 November 2024.

In circumstances where discussions take place with competitors, employees must use the following list of “Don’ts” as a guide:

DON'T

- Discuss pricing or other commercial conditions with competitors.
- Discuss or agree to share customers, volumes, supplies, or divide geographic markets with competitors.
- Discuss, agree, or exchange information on bidding strategies with competitors. Tender preparation and submission should be an independent process, and sensitive information should not be exchanged.
- Agree to bidding schemes with competitors or give/receive rewards for bidding cooperation.
- Share commercially sensitive information with competitors, such as customer prices, costs, production volumes, capacity, inventories, sales, market shares, bidding, procurement data, production, distribution, or marketing plans. If such information is received from a competitor, object to it, alert the Legal Department, and do not circulate the material internally.
- Collaborate with competitors to exclude another technology, competitor, or organization from the market (collective boycott).
- Discuss limiting production, distribution, or volumes with competitors.
- Remain present during meetings with inappropriate discussions and voice concerns before leaving. Insist that this incident is documented and report it to your manager and the Legal Department.

Business Integrity

Trade Secrets & Confidentiality Policy

Information of a confidential nature such as Trade Secrets are subject to strict regulations and it is of high importance that Trade Secrets and Confidential Information are not disclosed to any third party or used in a non-compliant way.

This Trade Secrets & Confidentiality Policy outlines the procedures for handling and safeguarding Trade Secrets and Confidential Information. It is mandatory for all employees and Representatives to familiarize themselves with this policy and abide by the principles stated herein.

Trade Secrets

A Trade Secret is valuable information belonging to a company which gives the company in question a competitive advantage. This may include information such as: information about technologies, finance, sales, strategy, operations, intellectual property rights (IPR), know-how, and potential mergers and acquisitions (M&A). All types of information can be a Trade Secret, as long as it holds value to the company.

A piece of information is a Trade Secret, if

- i. it is a secret in the sense that it is not known or readily accessible to a wide circle of persons;
- ii. it has commercial value because it is secret, and
- iii. it has been subject to reasonable steps by the company in control of the information, to keep it secret.

The information remains a Trade Secret until

- i. it becomes easily accessible;
- ii. no longer has commercial value; or
- iii. it is no longer protected.

Confidential Information

Confidential Information refers to information pertaining to Abacus Medicine, its employees, or information held by the company regarding third parties such as suppliers, customers, and business partners. This may include, but is not limited to, employee information, job applicant information, information about our business partners, business agreements, internal processes, strategy, prices and forecasts.

Abacus Medicine's commitment

Abacus Medicine will ensure that Trade Secrets, Confidential Information and personal data of employees, customers, suppliers, and business partners are being handled confidentially by making sure that:

- a. The information is not revealed to any third parties;

A Trade Secret may relate to marketing, export or sales strategies, or business management routines or procedures, including software used for various business purposes. Furthermore, technical or financial information, such as business plans, business processes, list of key customers, list of reliable or special suppliers, purchase prices of raw materials, test data, technical drawings or sketches, salary structure, product pricing and advertising rates, source codes, object code, data-bases, and electronic data complications, promotional or marketing material under development.

- b. Employees do not use the information, directly or indirectly, for personal gain;
- c. All employees and representatives are bound by an obligation of confidentiality;
- d. Any Confidential Information received from customers, suppliers, or other business partners is handled and used appropriately in accordance with the terms and conditions under which it was disclosed
- e. Abacus Medicine does not violate any of its agreed confidentiality obligations.
- f. Employees and representatives understand this policy, and receive training and instructions to avoid any breach of confidentiality and Trade Secrets; and
- g. Any information received by Abacus Medicine from any third party will as a starting point be treated as confidential.

You as an employee

During your employment at Abacus Medicine, you may be entrusted with Trade Secrets and Confidential Information. It is essential that you fulfil your legal obligation to safeguard and maintain the confidentiality of this information both during and after your employment.

All employees and representatives must actively take measures to protect Trade Secrets and Confidential Information by:

- i. Refraining from sharing or disclosing such information to any third party without adequate protection, such as a non-disclosure agreement.
- ii. Limiting access to the information when storing it, providing access only to colleagues who have a legitimate work-related need for it.
- iii. Adhering to internal security procedures and policies, including the IT Security Policy.
- iv. Using information obtained from third parties solely in accordance with the terms of its disclosure and for its intended purposes.
- v. Employees and representatives must not improperly acquire any Trade Secrets or Confidential information and are obligated to inform the Legal Department if they gain unauthorised access to Trade Secrets or Confidential Information that exceeds the scope of their role.

You should ask your immediate manager or the Legal Department for help if you are uncertain about whether a piece of information is compromised by a confidentiality obligation and ask for help if you have any questions concerning your confidentiality obligation.

Helpful tools to keep information confidential:

- i. Non-disclosure agreements (NDAs)
- ii. Integration of non-disclosure clauses in agreements
- iii. Marking confidential material with:
 - Confidential
 - Make no copies
 - Distribution limited to
 - Covered by NDA

Duty of confidentiality

You may not use Trade Secrets or Confidential Information obtained while working at Abacus for your own personal profit, and you may not share that information with anyone outside Abacus Medicine. When you leave Abacus Medicine for any reason, you must return any equipment, documents, or data containing Trade Secrets or Confidential Information to Abacus Medicine.

Questions and Concerns

Employees and representatives are always encouraged to bring any questions about this Policy directly to the Legal Department or have a manager pass on the questions.

All employees and representatives are obliged to familiarise themselves with this Policy and respect the principles herein, as well as reporting any evidence or suspicion of breach of this Policy to their immediate manager, the Legal Department or through Abacus Medicine's Whistleblowing Scheme.

Violations

Any violation of this Policy may lead to disciplinary measures or termination of the offender's employment with Abacus Medicine.

Approved by the Board of Directors on 26 November 2024.

Anti-Corruption and Conflict of Interest Policy

Purpose

The Abacus Medicine Group operates globally. Our employees and representatives are in contact with numerous stakeholders, e.g., other commercial companies, authorities, hospitals, suppliers, customers, service providers, patients, and counterparties all over the world.

The purpose of this Anti-Corruption and Conflict of Interest Policy is to ensure and support behaviour and work ethics characterised by the highest standards of personal and organisational integrity, both internally and externally, with Abacus Medicine's many different partners.

Violations of applicable law may have significant adverse effects on Abacus Medicine and any employees and representatives involved, including criminal liability. This Anti-Corruption and Conflict of Interest Policy provides guidance to employees and representatives on their required conduct when confronted with corruption, corrupt practices, or corrupt prepositions, and when working to prevent corruption.

What is Corruption?

Corruption is characterised by the misuse of entrusted power for private gain. It affects everyone whose life, livelihood, or happiness depends on the integrity of people in a position of authority, it threatens the stability and security of societies, and it undermines democratic institutions and values.

Corruption is best known in the form of bribery, fraud, embezzlement, or extortion. However, corruption does not exclusively involve money or gifts changing hands; it may also include the provision of services to gain advantages, such as favourable treatment, special protection, extra services, or quicker case processing.

Bribery

Bribery is the act of offering, giving (active bribery), receiving, soliciting, or accepting (passive bribery) something of value with the purpose of influencing the action of a governmental official in the performance of his or her public or legal duties.

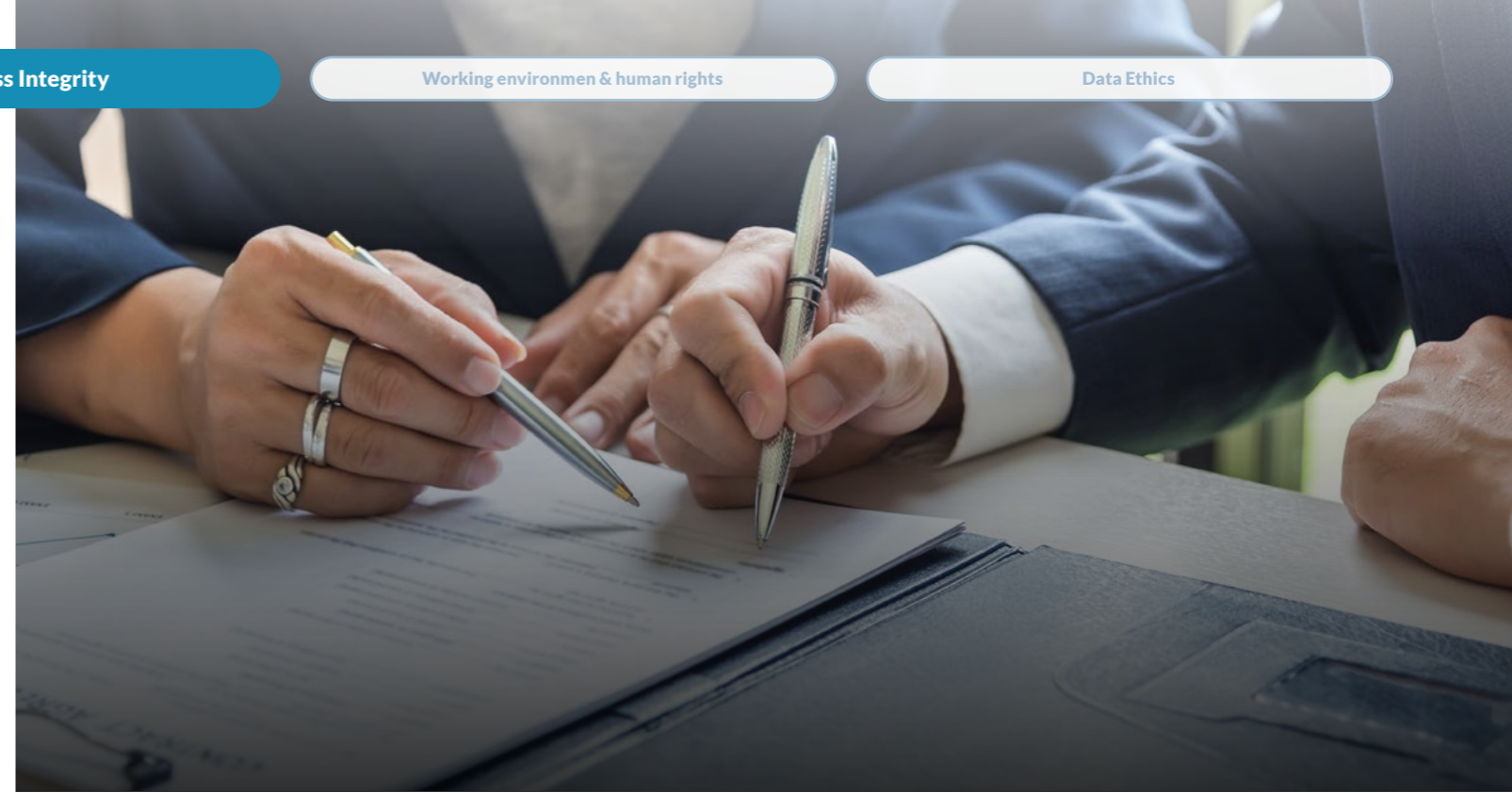
Bribery is illegal in all countries where Abacus Medicine is operating, and it is considered a violation of the American Foreign Corrupt Practices Act, the UK Bribery Act, and the OECD Convention on combating Bribery.

The principles which we follow:

1. We will not give or accept bribery in any form.
2. We will not engage in extortion or any similar practices and neither will Abacus Medicine engage in any negotiation with extortionists.
3. We will not use deception, trickery, or breach of confidence to gain unfair or dishonest advantages.
4. We will not offer, give, solicit, or receive, directly or indirectly, any gifts or other favours that may influence any decisions or judgements.
5. We will avoid any conflict – real or potential – between the employees' and the representatives' personal interests and the interests of Abacus Medicine.
6. We will report any evidence or suspicion of breach of this Anti-Corruption and Conflicts of Interest Policy to the Legal Department (legal@abacusmedicine.com) or through our Whistleblower Policy (<https://abacusmedicine.com/Whistleblowernetwork.net>).

If you are approached with a request to pay a bribe, you must always:

- a. Reject paying the bribe and refer to Abacus Medicine's Compliance Framework, which does not allow bribes;
- b. Get the name of the official requesting the payment, if possible; and
- c. Report (without delay) the incident in writing to your immediate manager and the Legal Department (legal@abacusmedicine.com).



Facilitation payments, also known as "grease payments", are small sums of money or valuables given to a third party, such as government officials or individuals in positions of authority, to expedite routine actions that the payer or Abacus Medicine is legally entitled to. These routine actions may include obtaining licenses, permits, delivering packages, or processing goods through customs. However, it is strictly prohibited for Abacus Medicine or any employees, or representatives to make facilitation payments.

Extortion

Extortion is the practice of obtaining something, especially money, through force or threats. Extortion is a criminal offense and extortionists often claim that they offer "a protection" or service to the giver in return for the extorted things, e.g., blackmail (threats to reveal information).

Fraud

Fraud is the use of deception with the intention of obtaining an advantage (financially or otherwise), avoiding an obligation, or causing loss to others. This involves being deliberately dishonest, misleading, engaging in deceitful behaviour, practising trickery, or acting under false pretence. Fraud is a criminal offense.

Gifts and Hospitality

As a main rule, we do not give or receive gifts to or from customers, business partners, or other stakeholders, as this may give rise to doubt about Abacus Medicine's impartiality. Gifts received from, for example, business partners, will be shared in the local Abacus Medicine Group entity in a reasonable manner, unless returned to the giver.

Gifts include, but are not limited to, cash or assets given as presents, and political or charitable donations.

Hospitality includes, but is not limited to, meals, hotels, flights, entertainment, or sporting events.

Reasonable personal gifts within normal practice in connection with receptions and social occasions such as work anniversaries or retirement are acceptable. Hospitality to or from customers, business partners, and other stakeholders is acceptable if it is appropriate,

- (i) in line with our core values,
- (ii) of a predominantly professional character, and
- (iii) reasonable and proportionate for the nature of the relationship.

Under no circumstances shall any employee of Abacus Medicine give or receive gifts or hospitality to or from public servants or officials, including personnel at public hospitals and pharmacies.

When receiving or giving gifts, the employee shall consider:

1. The fact that a gift given to or received from any official is always illegal.
2. The context and the value of the gift.
3. Whether the gift is linked to the business, e.g. does it promote the products of the business?
4. The nature of the benefits which may be received/given.
5. Any gifts given outside of an employee's private celebration will be collected and shared in the local Abacus Medicine Group company.
6. Gifts consisting of cash should not be exchanged.

Any gifts and hospitalities to hospitals, pharmacies and healthcare professionals must be coordinated with the Legal Department to ensure compliance with applicable national ethic rules for the pharmaceutical industry.

Employees must ensure that hospitality is only offered or accepted if:

1. There is a legitimate business interest in doing so;
2. Its value does not exceed what is normal for hospitality in the local area;
3. It remains one-off or irregular in nature. It may be in the form of a locally hosted meal, attendance at or participation in an organised 'team building' occasion, local cultural or sporting event, local industry award ceremony, business site visit, or similar responsible activity; and
4. Usual business contacts from Abacus Medicine and other parties are physically present.

Reporting gifts and hospitality

In order to ensure that gifts and hospitality are (i) in line with our core values and this Policy, (ii) of a predominantly professional character, and (iii) reasonable and proportionate for the nature of the relationship, the employee shall contact their immediate manager. The manager shall in an e-mail confirm that the gift or hospitality is appropriate. If in doubt, the immediate manager shall consult the Legal Department (legal@abacusmedicine.com).

Any gifts or hospitality of significant value (more than €100) must be reported to the Legal Department at legal@abacusmedicine.com in order for it to be recorded accordingly.

Conflict of interest

A conflict of interest may arise from situations in which an employee or representative has a private interest that could potentially influence, or appear to influence, the impartial and objective performance of his or her duties as an employee or representative. Private interests include any advantages to oneself or one's family, close relatives, friends, and persons or organisations which one has or has had business or political relations with. When faced with a potential or actual conflict of interests, employees are required to promptly inform their immediate manager.

Openness and transparency are the general rule

Openness and transparency are essential elements when fighting corruption. Within Abacus Medicine, we will ensure that all employees and representatives of Abacus Medicine:

- (i) understand this Policy, and
- (ii) receive training and instructions to avoid corruption.

Physical Payments

According to the Danish Anti-Money Laundering Act, Abacus Medicine and any of its employees may not receive any cash payments exceeding EUR 2,500 or an equivalent amount in any other currency. It is also prohibited for Abacus Medicine and any of its employees to hand out, receive, or exchange EUR 500 banknotes. Any act in which one or more EUR 500 banknotes are transferred from one legal entity or person to another legal entity or person, regardless of the circumstances surrounding the transfer, is prohibited. Violation of these principles may have consequences for the involved person's employment and result in legal actions in the form of fines and/or personal liability.



Obligations of the Employees:

1. Employees and Representatives should not give or receive gifts or other benefits in connection with their work with Abacus Medicine. This prohibition does not include reasonable, conventional hospitality and modest, appropriate gifts on special occasions from suppliers or customers. Gifts and hospitality shall only be offered or received in observance of local conventions and Applicable Law, including all laws and regulations applicable to Abacus Medicine's interactions with healthcare professionals.
2. Gifts or hospitality should never be offered or received, if they may make the recipient feel obliged, or appear to feel obliged, to make decisions favouring the provider of the gift or hospitality. Gifts of cash or cash-like items must never be offered or received.

Questions and Concerns

Employees and representatives are always encouraged to bring any questions about this Policy directly to the Legal Department or have a manager pass on the questions.

All Employees and representatives are obliged to familiarise themselves with this Policy and respect the principles herein, as well as reporting any evidence or suspicion of breach of this Policy to their immediate manager, the Legal Department or through Abacus Medicine's Whistleblowing Scheme.

Violations

Violation of this Policy may lead to disciplinary measures or termination of the offender's employment with Abacus Medicine.

Approved by the Board of Directors on 26 November 2024.

Working environment & human rights

Human Trafficking, Slavery, and Child Labour Policy

This Human Trafficking, Slavery and Child Labour Policy expresses the will of Abacus Medicine to combat Modern Slavery and its commitments to the issues related to Modern Slavery.

Modern Slavery is a fundamental violation of basic human rights and it is a crime. It takes various forms, including slavery, servitude, forced or compulsory labour, and human trafficking. These offences are closely related but legally distinct:

- a. Slavery is where ownership is exercised over a person;
- b. Servitude involves the obligation to provide services imposed by coercion;
- c. Forced or compulsory labour involves work or services exacted from any person under the men- ace of a penalty and for which the person has not offered himself or herself voluntarily; and
- d. Human trafficking involves arranging or facilitating the travel of another person with a view to exploiting them.

Scope

This Policy covers Abacus Medicine’s commitment to the fight against Modern Slavery and child labour. It sets out the general approach to the fight against Modern Slavery and child labour in the territories in which Abacus Medicine operates, particularly, the rules and regulations of the United Nations, the European Union, and the United Kingdom.

This Policy applies to all employees of Abacus Medicine and is also the standard to which we hold our suppliers.

Abacus Medicine wishes to encourage openness and will support anyone who raises a genuine concern that

Modern Slavery might be taking place in any part of Abacus Medicine’s business or in any entity within Abacus Medicine’s supply chains, even if that concern ultimately turns out to be mistaken.

Within Abacus Medicine, we are committed to doing our utmost to combat Modern Slavery. Abacus Medicine is taking steps to ensure that Modern Slavery is not taking place within its own organisation or at any supplier within its supply chain. The cornerstone of this commitment is to ensure that we remain accountable for our actions and our choice of suppliers throughout our supply chain.

Our objects

At Abacus Medicine, we will:

- Ensure that we comply with any and all legal and ethical obligations;
- Seek to ensure, where reasonably practicable, that our contractors, suppliers, and other business partners comply with terms that reflect the spirit and intention of this policy in their own businesses and in their own supply chains in support of the general eradication of Modern Slavery;
- From time to time assess and review the risk that Modern Slavery may be occurring in any parts of our business and in any of our supply chains. In light of any such risk assessments, we may from time to time seek specific reassurance from our contractors, suppliers, and other

business partners, and seek to carry out due diligence or specific audits either ourselves or through a third party to reassure ourselves that Modern Slavery is not occurring;

- Be committed to transparency in our approach to tackling Modern Slavery including the disclosure obligation under section 54 of the UK Modern Slavery Act 2015; by publishing our statement on the Modern Slavery Statement Registry, as well as on our website, which can be found here;
- The Legal Department, in collaboration with relevant stakeholders, shall collect and consolidate data on reported child, forced, or compulsory labour incidents. The consolidated data shall include the number of reported incidents, the type of labour violation, location, and the actions taken to address each incident. The consolidated data shall be reported to the Board of Directors annually;
- Perform annual inspections of facilities within Abacus Medicine’s internal operations. The frequency of inspections for these labour-related concerns shall be determined based on risk assessments, local laws, and industry standards. The results of these inspections shall be documented, and any non-compliance issues shall be reported to the Board of Directors and the relevant authorities for further action; and
- Provide training and guidance to our employees on how to vet suppliers, including how to identify and act in case of Modern Slavery.

Abacus Medicine expects all employees and representatives to:

Read, understand, and comply with this Policy;

Remain vigilant in identifying circumstances where there is a risk that Modern Slavery might be occurring in any part of Abacus Medicine’s business or in any of its supply chains;

and

Raise any concern with their manager or the Legal Department (legal@abacusmedicine.com). This can also be done anonymously in accordance with Abacus Medicine’s Whistleblower Policy (<https://abacusmedicine.whistleblownetwork.net>) in case of any suspicion that Modern Slavery or child labour might be occurring in any part of Abacus Medicine’s business or in anyof Abacus Medicine’s supply chains, at the earliest possible opportunity.

In the event that Abacus Medicine has reasonable belief that Modern Slavery is occurring in any part of its business, Abacus Medicine will:

- Put in place a remedial action as soon as reasonably practical with a view to ensuring that such Modern Slavery ceases to occur and that the victims of that Modern Slavery are appropriately safeguarded; and
- Monitor the eꞑectiveness of the remedial action taken, including the actions taken to safeguard the victims.

In the event that Abacus Medicine has reasonable belief that Modern Slavery is occurring within the Abacus Medicine organisation or in the supply chains of any of its contractors, suppliers, or other business partners, Abacus Medicine will expect the relevant contractor, supplier, or other business partner to:

- be fully transparent and supply such information as Abacus Medicine may reasonably request in relation to the issue;
- put in place remedial actions as soon as reasonably practical with a view to ensuring such Modern Slavery ceases to occur and that the victims of that Modern Slavery are appropriately safeguarded
- monitor the eꞑectiveness of the remedial action taken, including the actions taken to safeguard the victims; and
- report to Abacus Medicine at reasonable intervals on the effectiveness of that remedial action and safeguard any further steps taken to ensure that such Modern Slavery ceases to occur .

Further to the above, Abacus Medicine may, depending on the facts and the terms of the contract with the relevant contractor, supplier, or other business partner, terminate or suspend the relationship or otherwise cease, reduce, or minimise any business contact with the relevant contractor, supplier, or any other business partner.

Approved by the Board of Directors on 26 November 2024.

Diversity Policy

Purpose

Abacus Medicine recognizes the importance of promoting diversity and inclusion. The purpose of the Diversity Policy is to ensure equal opportunities without regard to diversity dimensions including age, gender, race, ethnicity, nationality, religion or belief, disability, family status, education, sexual orientation, gender identity and expression.

Abacus Medicine employs candidates for management and other positions with profiles and qualifications best suitable for the company. In this context, this Policy will be considered when appointing candidates while taking into account other relevant recruitment criteria, including professional qualifications, relevant experiences, educational background, etc.

Principles and practices to ensure and increase diversity

Abacus Medicine applies the following principles and practices to ensure and increase diversity:

- a Abacus Medicine encourages anyone interested to apply for vacancies and unsolicited opportunities, irrespective of gender, age, race, religion, nationality, ethnicity, family status, sexuality or disability ;
- b Abacus Medicine offers a flexible work environment that takes the demands of work and private life into account;
- c Abacus Medicine intends to increase diversity at all management levels to reflect the composition of the workforce across the company. Individual ambitions and career plans are addressed in Evaluation & Development Dialogues, and in the ongoing follow up conversations;
- d When conducting selection processes, Abacus Medicine endeavours, to the widest extend possible, to ensure that this Policy is reflected on the list of relevant candidates;
- e Abacus Medicine promotes employees into leadership positions based on merit, aiming to ensure that diverse individuals and underrepresented groups experience the same opportunities in their careers and in achieving managerial positions as others.
- f In the annual satisfaction survey, Abacus Medicine investigates if the employees feel that there are equal opportunities in Abacus Medicine.

Abacus Medicine seeks to be an attractive workplace for all employees and focuses on ensuring equal opportunities for all employees in career advancement and the prospect of occupying management positions.

Follow-up

The Executive Management is responsible for the policy of fostering diversity at other management levels than the Board of Directors.

The HR Department is responsible for ensuring diversity through employment procedures and making sure that the annual reviews are completed in accordance with the purpose set out in this Diversity Policy.

The HR Department will make sure that gender representation in the Executive Management and other management levels are reported in the Annual Reports.

Review

The Diversity Policy is approved by the Board of Directors of Abacus Medicine. The Diversity Policy is reviewed and amended when deemed relevant by the Board of Directors.

Publication

Abacus Medicine reports on relevant parts of the Diversity Policy annually in accordance with applicable law and regulations.

Approved by the Board of Directors on 20 December 2023

Anti-Discrimination Policy

Abacus Medicine strives to create and maintain a work environment that is respectful of all employees and free from all forms of discrimination and harassment. Abacus Medicine takes pride in the diversity of our workforce as it contributes to making Abacus Medicine an employer of choice.

Purpose

Abacus Medicine will provide an inclusive and welcoming environment for all members of our staff, clients, subcontractors, vendors, customers, and any other parties doing business with Abacus Medicine.

Equal employment and harassment-free workplace

Our employees are the diverse individuals who strive together to make Abacus Medicine a great workplace and one of the leading companies in Europe within our industry. We value their passion and personal integrity, and recognize those as the basis of our strength. Employees are therefore expected to treat one another with respect and dignity.

The Abacus Medicine Family

includes people from all around the world. We are proud to be the employer of more than 35 different nationalities. Such a diverse composition of cultures and backgrounds requires all employees to be sensitive and aware of the cultural differences to establish and maintain a non-discriminatory and inclusive workspace.

When considering what is appropriate, always start with the viewpoint of any recipient or listener. Remember, what is funny to you might not be funny to others, especially taking into account cultural differences.

Abacus Medicine does not tolerate discrimination or harassment in the workplace, including on the basis of age, gender, race, ethnicity, nationality, religion or belief, disability, family status, education, sexual orientation, gender identity, and expression. These principles extend to all employment decisions including recruiting, training, evaluation, promotion, and reward.

Abacus Medicine does not accept physical, psychological, verbal, sexual, or any other kind of harassment.

What will Abacus Medicine do

Abacus Medicine will proactively take measures to prevent and eliminate all forms of discrimination against any employee or job applicant in:

- a Recruitment;
- b Advertisements for employment;
- c Employment;
- d Compensation;
- e Termination;
- f Promotion; and
- g Other conditions of employment.

The measures taken by Abacus Medicine to prevent discrimination shall apply to all activities of Abacus Medicine, including selection of volunteers, vendors, and persons for provision of services.

Questions and Concerns

Employees and representatives are always encouraged to bring any questions about this Policy directly to the Legal Department or have a manager pass on the questions.

All employees and representatives are obliged to familiarise themselves with this Policy and respect the principles herein, as well as reporting any evidence or suspicion of breach of this Policy to their immediate manager, the Legal Department or through Abacus Medicine’s Whistleblowing Scheme.

Violations

Violation of this Policy may lead to disciplinary measures or termination of the offender’s employment with Abacus Medicine.

Reporting

If you have been a victim of, or have witnessed, discrimination, harassment or bullying etc., then contact your local HR Department, your line manager, the Legal Department (legal@abacusmedicine.com) or use the Whistleblower Scheme (<https://abacusmedicine.whistleblowernetwork.net>) if you wish to make an anonymous report.

You should treat everybody, including co-workers, suppliers, and current or potential customers, with respect and in a non-discriminatory way

- Encourage and listen to those who speak up;
- Be respectful of cultural differences;
- Base your work-related decisions on merit;
- Not engage in offensive messages or derogatory remarks; and
- Not make any inappropriate comments of a sexual nature or innuendo or undertake any sexually offensive behaviour.

Approved by the Board of Directors on 24 October 2023.

General clauses related to working environment and employment

Abacus Medicine endeavours to provide its employees with a safe, healthy, and secure work environment.

Colleagues and co-workers

The well-being of people is an important asset at Abacus Medicine. We seek to provide a safe, healthy, and productive work environment, and we work according to strict labour laws. We evaluate risks in our daily work environment and take necessary precautions to prevent accidents or injuries.

We often work hard. Long hours are not uncommon, but no one should work around the clock. Managers and employees have a shared responsibility in ensuring a sound balance between work and leisure in order to be able to continuously perform on a healthy, high level.

A culture of ambitious cooperation

At our core, Abacus Medicine is a respectful, diverse, and business-casual working environment, free of discrimination and with great opportunities for all to prosper. We are ambitious and we offer attractive and competitive terms to attract the most talented people.

We value open and proactive communication, encouraging people to speak up, express opinions, and be heard. We accept that mistakes are made, but expect them to be communicated and corrected immediately.

Abacus Medicine will:

- ensure a safe and healthy working environment (both physically and psychologically);
- ensure a workplace free of discrimination, harassment, or abuse;
- ensure that employees are cared for, including ensuring fair pay, fair working hours, and travel security;
- not discriminate against an employee for joining a union or for making the decision not to join a union;

- ensure that workers’ and employers’ organisations are not interfered with in their own establishment, functioning, or administration and will not try to control or direct unions through financial support or by other means; and
- continuously work on improving the health and safety environment for all employees at Abacus, and Abacus expects its employees to contribute and take action regarding their own health and safety as well as that of their colleagues.

As an employee, you should:

- stay informed and updated with guidelines for the working environment and safety in the workplace;
- follow the instructions given to you;
- use the personal protective equipment required to perform your work;
- not expose yourself or others to unnecessary physical or psychological strains;
- contribute to identifying causes of work accidents and participate in the prevention of recurrences;
- remember to take care of yourself, not only physically but also your mental well-being; and
- inform your line manager, your local AMO-representative or local HR Department if you feel that your working environment is not safe and healthy or that you or your colleagues are being harassed or discriminated for joining a union or choosing not to join a union.

Data Ethics

This policy regulates Abacus Medicine's compliance with data ethics principles. Data ethics concerns the ethical considerations which we as a company must consider when we use data and new technologies. According to the Danish Data Ethics Council:

"Data ethics is generally understood as the ethical dimension of the relationship between, on the one hand, technology and, on the other hand, citizens' fundamental rights, legal certainty and fundamental societal values, which technological development gives rise to consider. The concept includes ethical issues in the use of data."

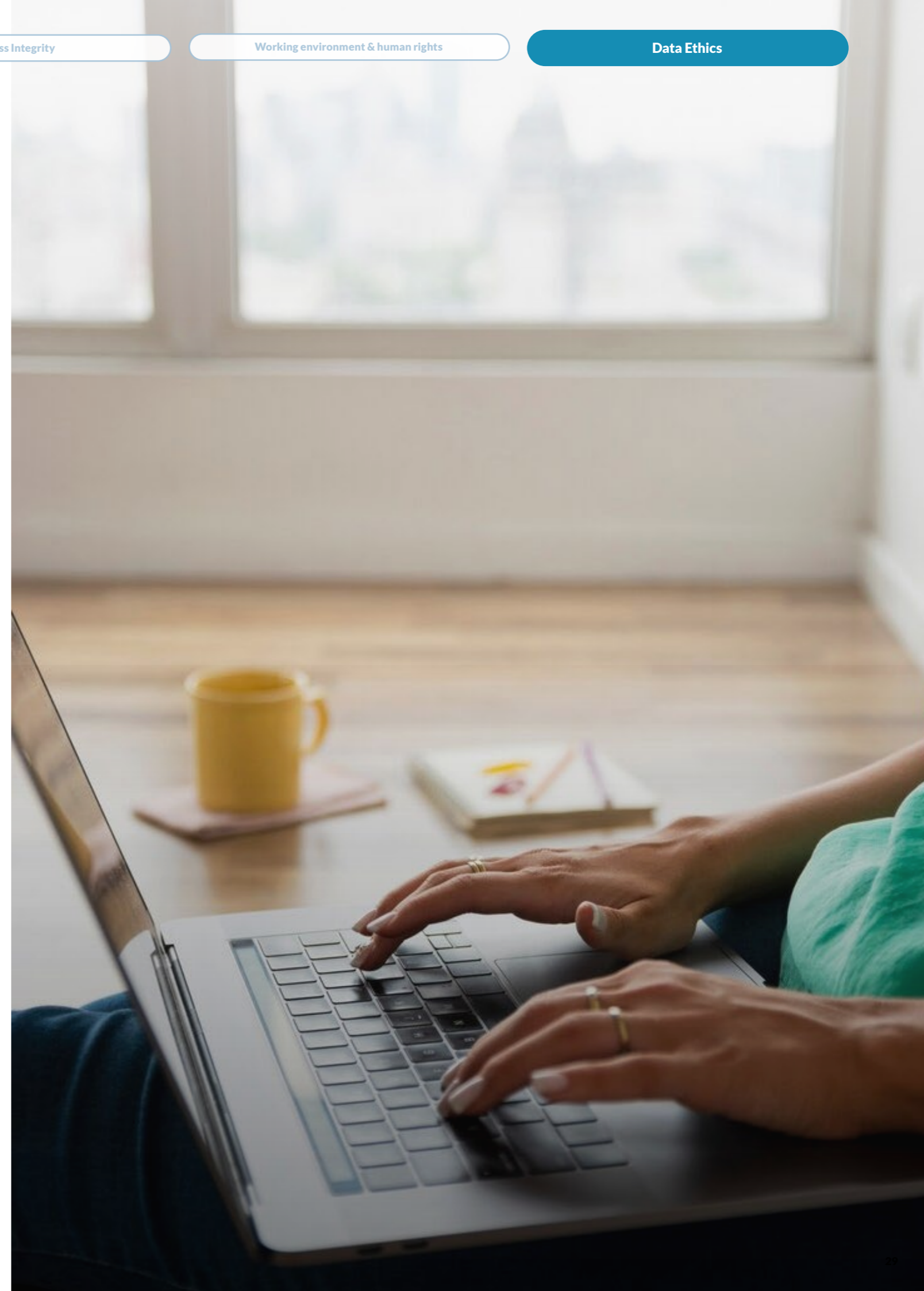
Data ethics goes beyond compliance with data protection laws and includes both personal and non-personal data. Abacus Medicine processes data in a data ethical manner by adhering to the following principles:

- Welfare – the processing of data must take place with respect and consideration for social conditions, society and democracy.
- Dignity – the processing of data must not be used to harm the individual, and data subjects should derive the primary benefit from the data processing.
- Private life – the processing of data must be done with respect for privacy and under the protection of personal data.
- Self-determination – when at all possible, data subjects must be able to make informed decisions about the processing of their data.
- Equality – the processing of data shall not discriminate on the basis of ethnicity, sexuality, gender, socio-economic background, political opinion, religion, trade union membership, genetic data, biometric data, disability or other health related data.
- Freedom – the processing of data must respect fundamental freedoms in a democratic society.
- Transparency – individuals should be able to understand how their personal data are used.
- Security – the processing of data shall be adequately secure, robust and reliable.

- Accountability – it must be clear at all stages who is responsible for the processing of data and thereby holding them accountable.

Abacus Medicine considers the abovementioned principles when processing data and implementing new technologies. The principles should be read in conjunction with the other policies in the Compliance Framework and are applicable to the whole Abacus Medicine Group.

Approved by the Board of Directors on 24 October 2023.



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