

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 Pharmaceuticals 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 1st of January 2025 – 31st of December 2025

Abacus Medicine has a zero-tolerance position on violations to the UK’s Anti-Human Trafficking and Anti-Modern Slavery laws. We are committed to acting ethically and with integrity in all 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 policies as outlines below, 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 operates in a life-critical business where trust is non-negotiable. Our purpose is to improve healthcare through better access to medicine. The ultimate parent company for the Abacus Medicine Group is Abacus Medicine A/S which has its headquarters in Copenhagen, Denmark. The main business areas are as follows:

Pharma Trading

Abacus Medicine is one of the market leaders in the European parallel import industry. Parallel import of medicine is based on the principle of the free movement of goods within the EU. For Abacus Medicine, this means that we can source original medicines from across the EU and transport them to one of our repackaging facilities. Here, the medicines undergo extensive quality checks followed by the repackaging of the original medicine. The medicines are then distributed to customers across the EU/EEA at lower prices.

Pharmaceutical wholesaler

Through Abacus Medicine’s subsidiary, Pluripharm, we operate as pharmaceutical wholesaler with a complete range of services. With this we support pharmacies, patients and hospitals in the Netherlands with the purpose improving the patient’s quality of life.

Pharmaceuticals

Abacus Medicine Pharmaceuticals (AMP) operates as a partnering focused pharmaceutical company, working with innovative pharma and biotech partners to bring specialty and rare disease medicines to patients across Europe.

Clinical trial services

Leveraging our expertise in the clinical trial services' industry, Abacus Medicine offers a range of services and technologies aimed at enhancing various aspects of clinical trials within the biotech and pharmaceutical sector.

As per 31st of December 2025, the Abacus Medicine Group consists of 56 legal entities. The number of employees was more than 1700 in 9 different countries. For our parallel import and wholesale service we have warehouses and repacking facilities in the Belgium, Netherlands and in Hungary and warehouses in Ireland and Germany.

Supply chain

Abacus Medicine works with many suppliers of medicines from Europe, more 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.

Policies and governance

Our commitment to combating modern slavery is underpinned by our Supplier Code of Conduct, policies and governance structures, as explained below.

Abacus Medicine has a Supplier Code of Conduct for medicinal suppliers. It follows from the Supplier Code of Conduct that any potential issues shall be identified, appropriately investigated and remedial actions taken.

Further, we operate with the following policies and framework to prevent modern slavery and human trafficking in our business and supply chain.

- A Human Trafficking, Slavery and Child Labour (Modern Slavery) Policy
- A Whistleblower Policy
- An Anti-Corruption & Conflict of Interest Policy
- Abacus Medicine Compliance Framework (hereafter "Policies")

The requirements set out require all employees at Abacus Medicine to act in accordance and in respect for human rights in their daily decision. In short, employees must:

- Read, understand, and comply with the policies;

- 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;
- Raise any concern with their immediate manager or the Legal Department (legal@abacusmedicine.com). This can also be done anonymously in accordance with Medicine's Whistleblower Scheme.

All policies within the business are yearly authorized, reviewed and processed by the Legal Department and representatives from the Executive Management Team. Further, the policies have been approved by the Board of Directors in 2025. Policies and procedures are kept under review to make sure they reflect the changing needs of Abacus Medicine. The responsibility to oversee and implement the policies sits in the Compliance Team in Copenhagen.

Risk assessment and management

Supply Chain

Our main risk area is our supply chain, due to its complexity and global nature. Abacus mainly operates in the EU, and trading of medicine in the EU is extremely regulated. The stakeholders in our supply chain are regularly controlled by the authorities. Therefore, we believe that the risk of slavery, human trafficking and the violation of human rights is minimal. We have not identified any incidents of violation of human rights in our supply chain.

Though the risk is minimal, Abacus Medicine actively takes steps to mitigate the risk. Firstly, we expect all our suppliers to live up to our Supplier Code of Conduct. In this way, we make sure that we only work with professional and reputable actors in the market who share our commitment to ethical practices.

Secondly, we ensure that products purchased from vulnerable areas, meaning areas with higher corruption index than other EU countries, are being handled with extra caution and only by a designated experienced purchaser.

By virtue of our business, our QA department conducts regular audits and visits to medicinal suppliers. The QA department receives yearly compliance training which includes training in modern slavery to help them identify any incidents.

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.

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. 77% employees in Abacus Medicine have completed compliance training for 2024 including training on modern slavery. We do this to ensure that the relevant employees have thorough knowledge of our policies and procedures and can act accordingly.

Approved by CEO Flemming Wagner