

The Compliance Management System of the PHOENIX group

Dear Sir or Madam,

Nomeco A/S is part of the PHOENIX group.

The PHOENIX group, headquartered in Mannheim, Germany, is the European leader in pharmaceutical wholesale, pharmacy retail, and services for the pharmaceutical industry. With a presence in 29 healthcare markets, the company offers unique geographical coverage throughout Europe, making a vital contribution to comprehensive healthcare with more than 48,000 employees.

The PHOENIX group is active in the pharmaceutical wholesale and pre-wholesale business areas with 224 sites in 29 countries supplying pharmacies, doctors, and medical institutions with medicines and health products. Numerous other products and services for pharmacy customers complete the portfolio – from assistance in advising patients to modern goods management systems to pharmacy cooperation programs. The company offers Healthcare Logistics and other services to the pharmaceutical industry along the entire supply chain. The PHOENIX group also operates over 3,200 of its own pharmacies in 17 European countries, in which around 185 million patients per year receive expert advice from pharmacists in addition to their medicines.

As such, we have guidelines and procedures in place to ensure that our company continuously complies with applicable laws. The PHOENIX group has set up a robust Compliance Management System (CMS) to prevent, detect and adequately respond to Compliance infringements.

This also includes our full commitment to comply with all applicable Anti-Bribery, Corruption, Antitrust, Sanctions & Embargoes and Anti-Money-Laundering laws.

You may consult the PHOENIX group's Compliance site and selected publicly disclosed guidelines here: <https://www.phoenixgroup.eu/en/about-phoenix/compliance>

We draw your attention to the following:

1. Nomeco A/S, as part of the PHOENIX group, has several Compliance Guidelines ("Guidelines") in place (including a Code of Conduct, Anti-Corruption Guideline, Competition Compliance Guideline, Sanctions & Embargoes Guideline, and Anti-Money-Laundering Guideline);
2. The Guidelines contain rules and processes which help us to comply with applicable regulations. Further, they help us to promote a culture of ethics and integrity. Nobody in the company is exempt from the regulations of these Guidelines and Nomeco A/S does not tolerate any breaches of them;
3. Employees and third parties are encouraged to report breaches of any of the Compliance guidelines or principles. All reported cases are consistently and properly followed-up. Employees are protected from retaliation;
4. Employees of Nomeco A/S receive regular Compliance trainings using a risk-based approach. Besides Compliance e-Learnings, employees are also trained in Compliance presence trainings, based on their Compliance risk profile;

5. The PHOENIX group maintains a Compliance Risk-Management and Internal Control System (ICS). With it, we adequately counter the inherent Compliance risks of our business. Nomeco A/S is part of the group-wide Compliance Risk and ICS system;
6. Nomeco A/S requires business partners to undergo a risk-oriented "Business Partner Due Diligence" procedure before entering into a business relationship;
7. The CMS of the PHOENIX group is certified according to Standard IDW AsS 980 (Rev. 09/2022) [Appropriateness Certification] by external auditors. The certification includes the segments Anti-Corruption, Competition Compliance, Sanctions & Embargoes Compliance and Anti-Money Laundering. The certification date is 31.01.2024;

We trust the information contained herein provides you with a good overview of the Nomeco A/S CMS. We remain available to address any questions that you may have.

Kind Regards

Nomeco A/S