



Novo Nordisk Policies

Effective 1 September 2014

Introduction to Novo Nordisk Policies

The Novo Nordisk policies provide guidance on basic principles on how we conduct business in Novo Nordisk. 14 areas are covered by policies: *bioethics, business ethics, communication, environment, finance, global health, information security, information technology, legal, occupational health and safety, people, procurement, quality, and risk management.*

The Novo Nordisk policies provide a link from the Novo Nordisk Way to how we operate in Novo Nordisk.

The Novo Nordisk policies serve as internal guidance and as information to external stakeholders.

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Bioethics Policy

In Novo Nordisk we will discover, develop and produce biological medicines with respect for people, animals and the environment.

This means that we will:

- continuously improve our performance
- promote bioethical awareness in Novo Nordisk
- operate by high ethical global standards in research involving people, animals, human materials and gene technology
- require adherence to high ethical standards by our external partners, contract research organisations and suppliers, and monitor their performance
- engage in stakeholder dialogue and partnerships helping us to deal with ethical dilemmas
- act in accordance with international conventions.

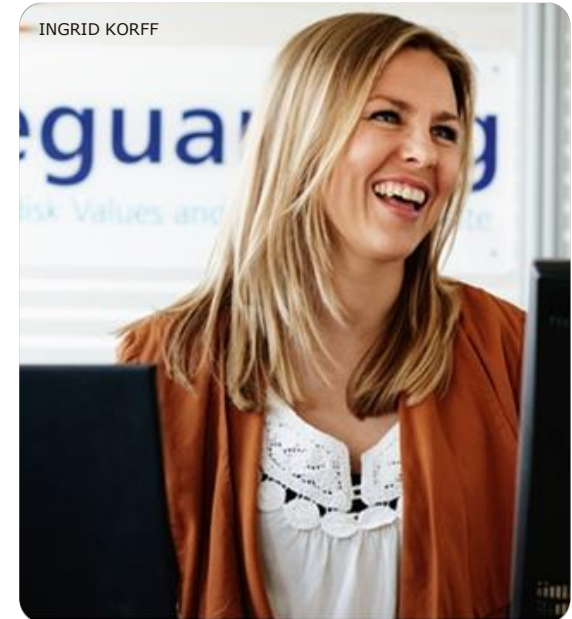


Business Ethics Policy

In Novo Nordisk we will act with integrity in our efforts to deliver competitive results.

This means that we will:

- apply consistently high business ethics standards across the value chain
- address day-to-day dilemmas guided by the Novo Nordisk Way
- be transparent about our business decisions and practices
- hold ourselves accountable for acting with integrity and in compliance with the UN Global Compact.

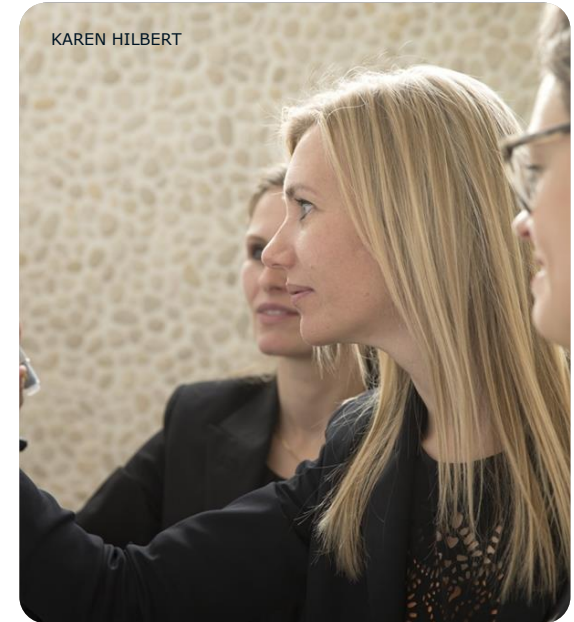


Communication Policy

In Novo Nordisk we will communicate effectively with all our internal and external stakeholders.

This means that we will communicate in a way that is:

- *clear* – understandable and to the point
- *credible* – open, honest and balanced, both when the news is good and bad
- *relevant* – timely and customised to meet the information needs of the people we communicate with
- *respectful* – to all the people we communicate with and about
- *two-way* – encouraging dialogue between us and our stakeholders.

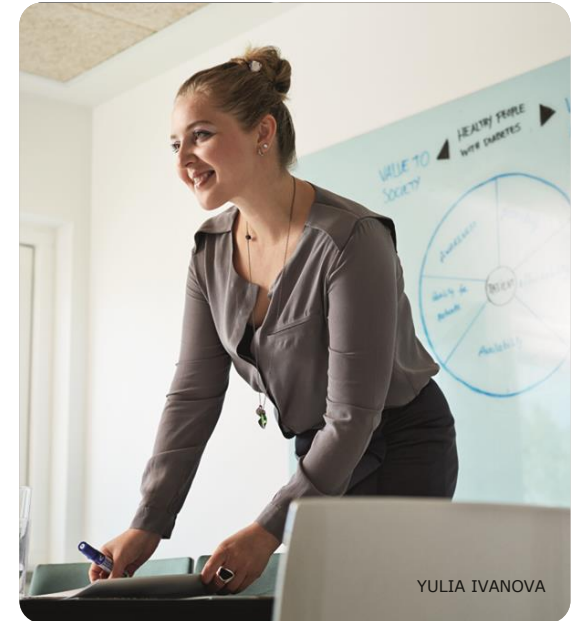


Environment Policy

In Novo Nordisk we will reduce our use of resources and the environmental impact from our activities.

This means that we will:

- continuously improve our performance
- integrate environmental assessments in all decision-making across the value chain
- promote more sustainable processes and products
- engage in stakeholder dialogue and partnerships
- comply with the UN Global Compact.



Finance Policy

In Novo Nordisk we will grow as an independent company and ensure competitive value creation for our shareholders.

This means that we will:

- pursue challenging short- and long-term financial targets
- integrate a financial perspective in key business decisions
- ensure financial flexibility to pursue business opportunities at a competitive cost of capital
- manage risks
- pursue a competitive tax level in a responsible way
- apply efficient best practice processes and customer mindset globally.



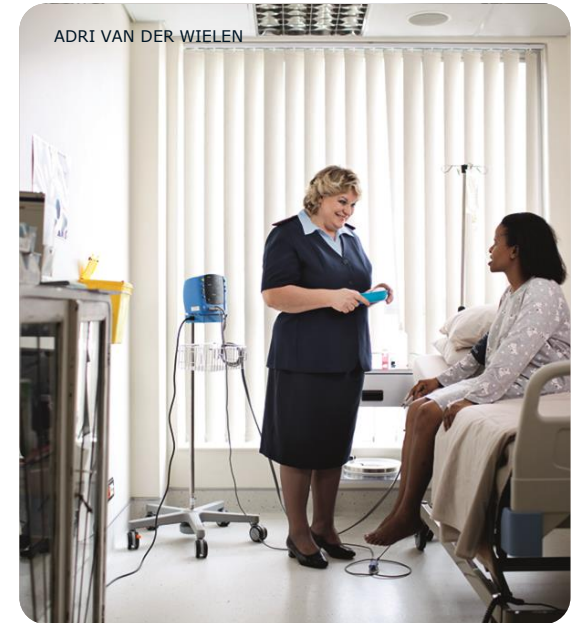
Global Health Policy

In Novo Nordisk we will discover, develop and provide high-quality products and services within our areas of expertise to help patients live better lives throughout the world.

This means that we will:

- contribute to the aspiration of the World Health Organisation's Global NCD* Action Plan 2013-2020
- carry out research to make new and better therapies, products and services available, covering unmet medical needs
- take initiatives to make our products and services accessible to those who need them
- contribute to the development of sustainable healthcare systems
- advocate equal rights and accessibility to healthcare for all.

* Noncommunicable diseases (NCDs) – mainly cardiovascular diseases, cancers, chronic respiratory diseases and diabetes

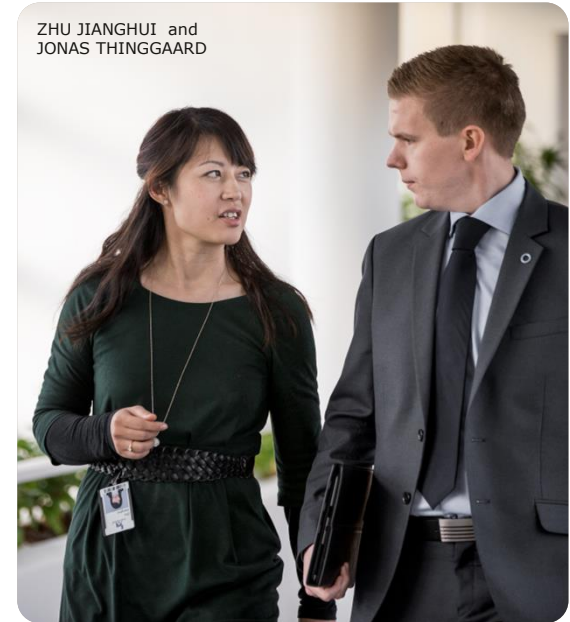


Information Security Policy

In Novo Nordisk we will manage the security of business critical information in relation to employees, physical premises and IT

This means that we will:

- Protect handling and use of business critical information in any form
- Promote information security awareness
- Ensure that adequate security measures are applied
- Continuously monitor, review and report on the maturity of information security
- Ensure that weaknesses, incidents and violations are detected and solved



Information Technology Policy

In Novo Nordisk we will apply the best and proven information technology to support our global competitiveness.

This means that we will:

- ensure business-driven, global IT strategies
- apply effective IT governance practices to maximise benefits of projects, systems and infrastructure
- pursue a standardised and consolidated IT operation
- simplify our IT architecture by minimising the number of applications and implementing standard solutions
- manage IT costs by making them transparent and competitive
- mitigate IT risks by applying balanced security controls.



Legal Policy

In Novo Nordisk we will conduct our business in legal compliance and secure the company's assets and interests.

This means that we will:

- comply with the wording and intention of all relevant laws and regulations
- promote legal awareness and ethical behaviour to secure compliance and sound business decisions
- manage legal risks and pursue opportunities that add value to the business throughout the world
- respect legal rights of others
- ensure good corporate governance.

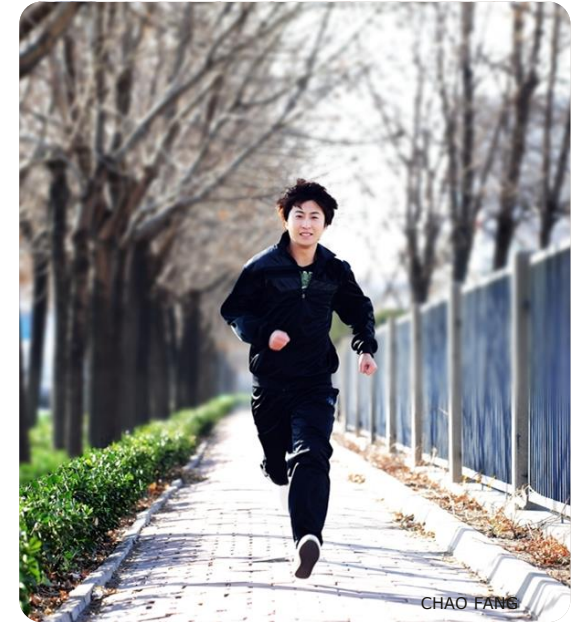


Occupational Health and Safety Policy

In Novo Nordisk prevention and continuous improvement is key. We strive to uphold a safe working environment and promote the health of our people.

This means that we will:

- operate by high occupational health and safety standards throughout the world
- hold our people accountable for their actions regarding workplace safety
- promote a healthy lifestyle
- ensure that the working environment is not compromised for economic or productivity reasons
- follow relevant international conventions.

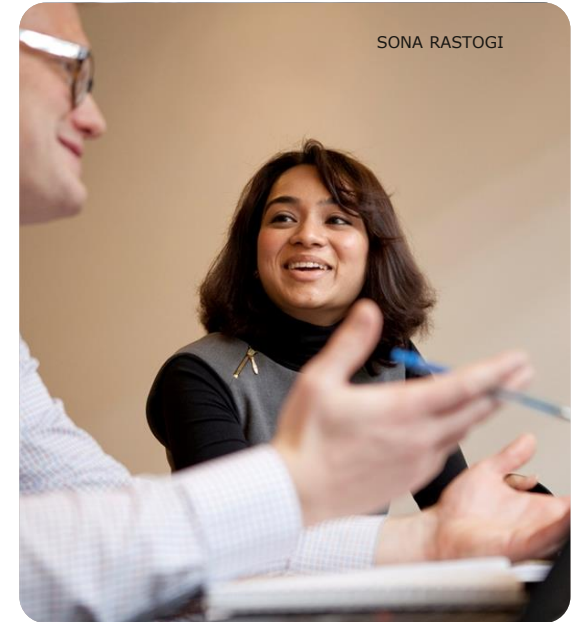


People Policy

In Novo Nordisk we provide attractive, engaging and effective workplaces for our people.

This means that we:

- attract diverse talent globally
- ensure an inclusive and respectful workplace providing equal opportunities for all
- are committed to the on-going development of our people
- develop leaders who will drive talent management, engagement and performance of our people
- provide market competitive remuneration and employment conditions
- follow the UN Global Compact guiding principles.



Procurement Policy

In Novo Nordisk we will purchase at best terms, balancing price with delivery, quality and risk as well as social, environmental and ethical responsibility.

This means that we will:

- purchase from suppliers selected in accordance with Novo Nordisk standards
- create value for Novo Nordisk by using our global purchasing power
- interact with our suppliers in a competent and proactive way
- establish close cooperation with suppliers of strategic importance
- accept no gifts.



Quality Policy

In Novo Nordisk we ensure quality to meet the expectations and needs of all stakeholders securing patient safety, product quality and compliance.

This means that we will:

- develop and deliver high-quality products with the lowest risk to patients
- maintain and continuously improve the effectiveness of the quality management system
- optimise business performance without compromising patient safety or compliance
- encourage legislation that secures patient safety and product quality
- promote quality awareness throughout the company and the entire supply chain
- never compromise on quality.

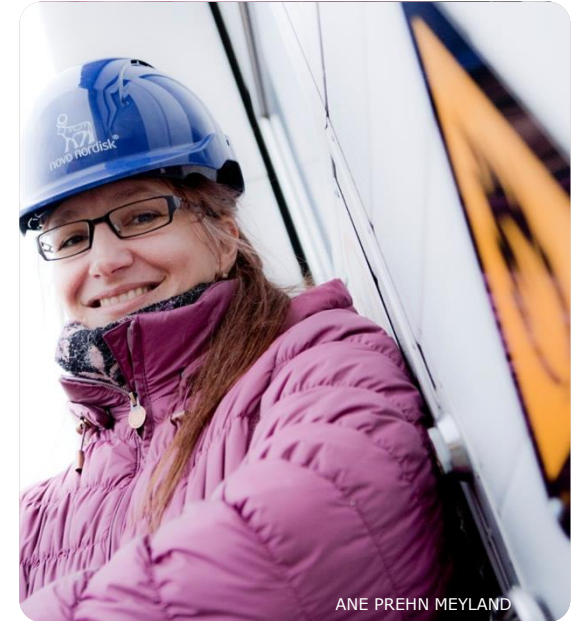


Risk Management Policy

In Novo Nordisk we will proactively manage risk to ensure continued growth of our business and to protect our people, assets and reputation.

This means that we will:

- utilise an effective and integrated risk management system while maintaining business flexibility
- identify and assess material risks associated with our business
- monitor, manage and mitigate risks.



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Anchoring of Novo Nordisk policies

Novo Nordisk Boards and Committees are responsible for maintaining and updating Novo Nordisk policies.

POLICY	BOARD OR COMMITTEE
Bioethics Policy	Sustainability Committee
Business Ethics Policy	Business Ethics Board
Communication Policy	Global Communication Board
Environment Policy	Sustainability Committee
Finance Policy	Global Finance Board
Global Health Policy	Health Policy Committee
Information Technology Policy	IT Committee
Information Security Policy	IT Committee
Legal Policy	Global Legal Board
Occupational Health & Safety Policy	Sustainability Committee
People Policy	Global People Board
Procurement Policy	Procurement Committee
Quality Policy	NNQMan
Risk Management Policy	Risk Management Board

Novo Nordisk policies are approved by ExecMan and endorsed by ManBoard.

Adding new policies or removing existing policies must be approved by ExecMan.

References

(1) 017854 - Novo Nordisk Way

Definitions

TERM	DEFINITION
Novo Nordisk Way	The Novo Nordisk Way describes who we are, where we want to go and the values that characterise our company
Novo Nordisk policies	A Novo Nordisk policy provides high level guidance on basic principles on how we conduct business in specific/key areas towards a desired outcome