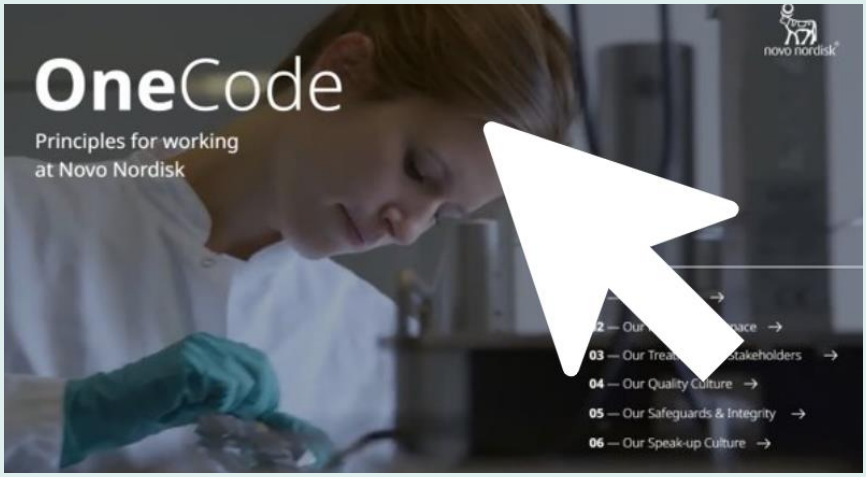
OneCode

Principles for working at Novo Nordisk

Click here to access OneCode:



https://onecode.novonordisk.com

Chapter overview

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A message from our CEO

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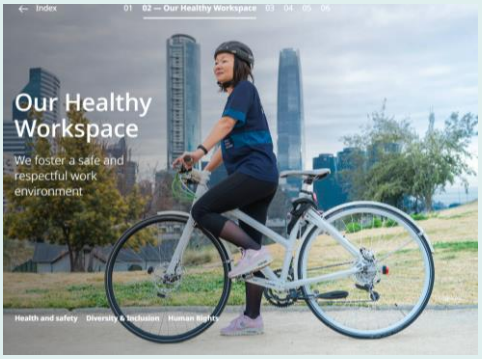
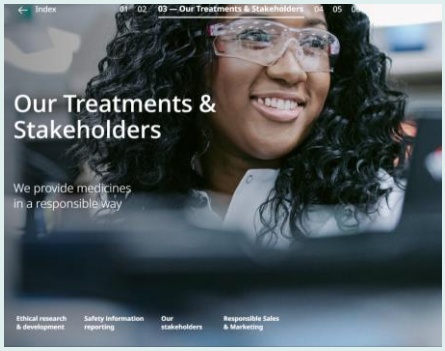
We foster a safe and respectful work environment



03 Our Treatments & Stakeholders
We provide medicines in a responsible way



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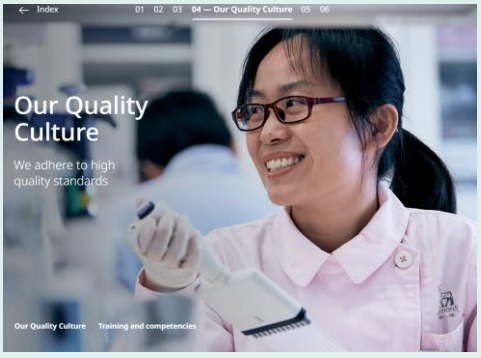
We deliver highest quality to patients



05 Our Safeguards & Integrity
We protect ourselves, Novo Nordisk and society

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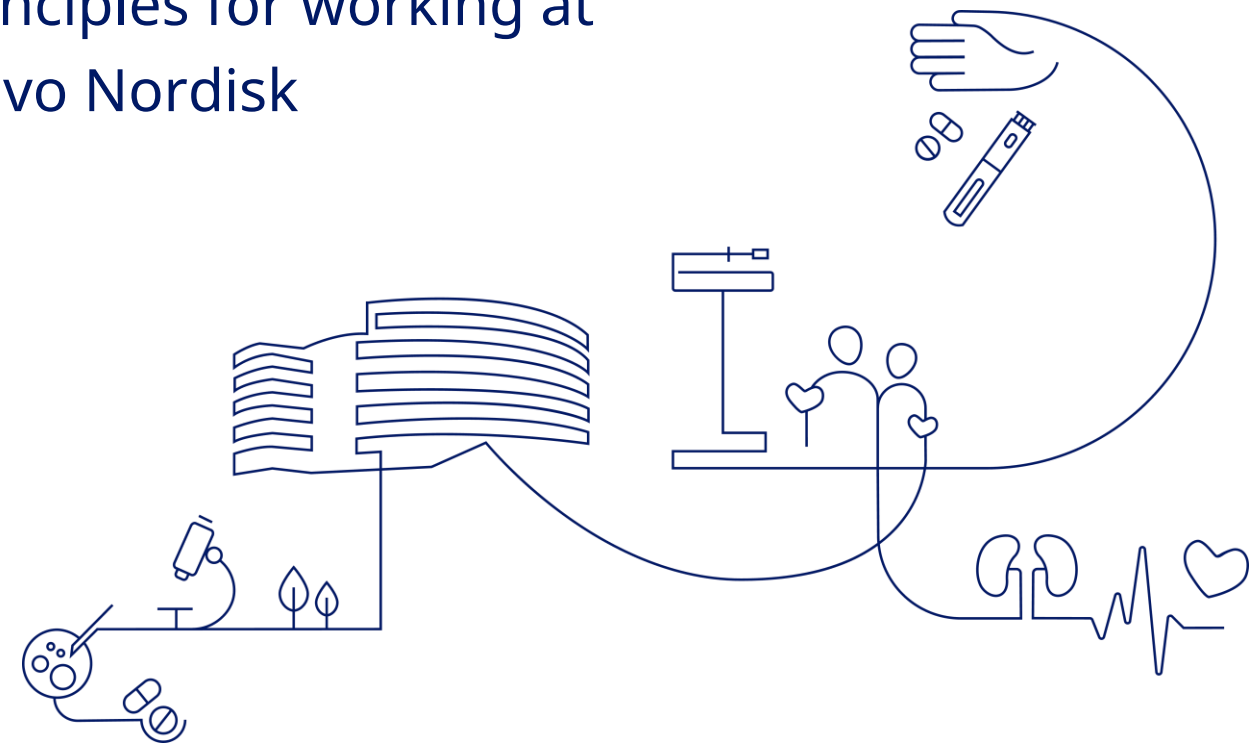
OneCode

Principles for working at Novo Nordisk



OneCode – Principles for working at Novo Nordisk **applies to everyone employed by or working on behalf of Novo Nordisk**. The purpose of OneCode is to guide us on how we act as a company and as individuals, empowering each of us with the principles and requirements to make the **right decisions across our business**.

Contents

01 – Our Purpose

A message from our CEO

Every day, thousands of people worldwide go to work at Novo Nordisk. Each of us is committed to our shared purpose of driving change to defeat serious chronic diseases, built upon our heritage in diabetes. By discovering and developing new and innovative medicines, we address diseases that affect hundreds of millions of people around the world. I am proud to be part of this ambitious journey with you.

Patients are essential to our purpose and have been so since the day Novo Nordisk was founded in 1923. They are our neighbours, families and friends. We work tirelessly to improve patients' lives, enhance access to care and collaborate with partners to enable affordable care for more people worldwide. Our decisions are based on what is best for patients and, thereby, for Novo Nordisk.

We operate in a highly regulated environment and following applicable rules and regulations is critical to safeguarding our license to operate. Our values are expressed in the Novo Nordisk Way. OneCode supports us in living up to the Novo Nordisk Way, especially essential 10 'We never compromise on quality and ethics'.

The purpose of OneCode is to guide us on how we act as a company and as individuals. It empowers each of us with the principles and requirements to make the right decisions across our business. OneCode applies to everyone employed by or working on behalf of Novo Nordisk. OneCode helps us do the right thing, so that we can fulfil our purpose in an ethical and compliant way.

OneCode is not an exhaustive list of every principle or policy you may need to know, but it is a good roadmap and directs you to additional resources. Therefore, use the Novo Nordisk Way, OneCode and relevant Standard Operating Procedures (SOPs) to guide your actions and decisions.

We all share the responsibility to live by OneCode.

Sincerely,

Lars Fruergaard Jørgensen

President and CEO of Novo Nordisk

02 – Our Healthy Workspace

Together, we foster a safe and respectful work environment

Health & Safety

We care about your well-being while you are at work and when you return home after work. We support an environment which allows you to perform at your best and to experience a balanced life. We care for each other by fostering a culture of mutual respect and support. Well-being at Novo Nordisk is feeling safe and knowing that you've been given the trust and tools to do your job at the highest level, whether working on-site, remotely or in the field.

What does it mean for me?

- Speak up and act, if you see or experience something or someone at risk – we can all make a difference for ourselves and our colleagues. Use your manager or local Health and Safety Representative/Coordinator, when needed
- We all play a role in ensuring a healthy and engaging working environment – see more here

Diversity & Inclusion

We fundamentally believe that diversity and inclusion drive value for Novo Nordisk by enabling a diverse line of thought, increasing innovation, and leading to better and more nuanced decisions and stronger risk-management. That is why we bring together people of diverse backgrounds and perspectives and work together to create an inclusive culture, where all employees have a sense of belonging and equitable opportunities to realise their potential. Because we can only unlock the full potential of our company, if we have an inclusive and diverse organisation representative of the patients, customers and societies we serve.

What does it mean for me?

- It means that you value diversity and are part of building a culture where everyone can bring their whole self to work
- That you seek diverse perspectives that challenge bias and assumptions

Visit the Novo Nordisk website to learn more about how we are working with Diversity & Inclusion in Novo Nordisk.

Read our Global Diversity & Inclusion policy to learn more about our aspirational targets and how we hold ourselves accountable.
Visit the global Diversity & Inclusion SharePoint site to access tools and resources.

Human Rights

Human rights are a set of fundamental rights and freedoms that are inherent to all human beings, regardless of their race, gender, nationality, religion, or any other status. Everyone is entitled to human rights without distinction. We respect all human rights and are committed to fulfilling the UN Guiding Principles on Business and Human Rights. We do not tolerate discrimination or harassment in any shape or form – either at Novo Nordisk or by business partners. That is how we build a safe and respectful work environment.

What does it mean for me?

- Treat everyone with respect
- Do not engage in or tolerate harassment, discrimination or retaliation
- Avoid negative impacts on people and address such impacts, if they occur
- Agree on Human Rights expectations with business partners

Read our Anti-Harassment Framework here, and see how to report an actual or potential violation here.

To learn more, read our Human Rights Commitment here.

03 – Our Treatments & Stakeholders

We provide medicines in a responsible way

Ethical Research & Development

Medicines from Novo Nordisk are subjected to high quality and safety standards throughout the life cycle. From early research to clinical trials to when our medicines are available to patients, we never compromise on applying high standards. We are committed to ensure the welfare and ethical treatment of animals involved in the development of our medicines. We respect all human subjects' rights, integrity, and dignity to ensure their safety and well-being.

Bioethics is embedded in our research and is fundamental to our decision-making processes and aligned with our sustainability principles. Our research activities and clinical trials fulfil international and national ethical and human rights principles. We are committed to transparency and share our results openly.

What does it mean for me?

Apply the following principles for any research and clinical trials activity:

- Ensure accountability through a governance framework
- Act in accordance with ethical, legal, quality, and regulatory standards
- Assess compatibility for data use
- Ensure a fair balance of interests
- Apply a sound scientific approach
- Protect privacy & confidentiality
- Demonstrate oversight & compatibility
- Always ensure free, prior and informed consent of any participant

For more information, read Novo Nordisk Principles of Clinical Research here and Global Bioethics standards here.

Safety information reporting

You must inform your local safety department of any safety information involving Novo Nordisk products that is reported directly to you. This includes information received outside working hours, and it applies whether the Novo Nordisk product is a drug or a medical device, including Software as a Medical Device (SaMD). Safety information may be reported to you by patients, customers, healthcare professionals or others, but regardless of the source, you must forward the information within 24 hours (in Japan within the same day). If you are not sure whether to forward the information, forward it anyway.

What constitutes safety information?

- Side effects (adverse events): any healthcare problem or symptom experienced by a user of our products, where there is a suspected connection to the use of the product
- Serious outcomes, e.g., hospitalisation or death
- Use of a Novo Nordisk drug during pregnancy including outcome of a pregnancy, where the fetus may have been exposed to a drug product through parental exposure
- Any adverse event occurring in infants following exposure to a drug product from breastfeeding
- Any suspected transmission of an infectious agent via drug product
- Overdose, drug abuse, and drug misuse
- Medication errors: e.g., administration of the wrong drug
- Lack of efficacy: the drug does not give the expected beneficial effect
- Occupational exposure: exposure to a Novo Nordisk product as a result of one's occupation. E.g., accidental needle stick while working as a nurse
- Technical Complaints: any information that claims product (drug or medical device) defects
- Suspected counterfeit, diverted or stolen products

What information must be obtained for the report?	• Patient details (age/age group, gender) • Name of the Novo Nordisk product and the batch number (which indication and period of use) • Details about the reported safety information (what happened, when occurred, recovery status) • Details about the reporting person (e.g., phone number or email). Novo Nordisk will probably need to follow up for more information, if the person has agreed to be contacted
How to report safety information?	Report the safety information to your local department – type localsafety/ in your browser. For example, employees in Denmark must report to the Danish affiliate's safety department. If you are unable to do it, then report to your direct manager within the same timeframe. As a last option, you can report directly to Global Safety in HQ via email: patientsafety@novonordisk.com
Let the person reporting the safety information know that...	• You need to forward the information to the safety department for the sake of patient safety and to comply with current legislation • The data will be treated confidentially and stored in the Novo Nordisk database for a minimum of 10 years after complete removal of the product from the market • Novo Nordisk is obliged to report information on product complaints and side effects to health authorities in accordance with local legislation • The full information on how we process personal data in Novo Nordisk can be found on the Novo Nordisk global company website under "Report a side effect" or on the local affiliate company website

Our stakeholders

We interact with external stakeholders in various ways to advance quality of care. We ensure that our interactions with stakeholders are justified by a valid business purpose and are fully compliant, as we never compromise on ethics. We treat all stakeholders fairly and honestly, respect their independence and we expect our partners to act with integrity.

Patients and Patient Organisations	Our business approach is patient-centred, and we believe that regular and systematic patient involvement and dialogue are vital to improving our products, treatments and care.
Healthcare Professionals and Healthcare Organisations	We interact with Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs) in many ways, including for our research and development activities, medical information communications, educational efforts and promotional activities, in order to provide, exchange or obtain scientific or educational input.

Public Officials	We interact with Public Officials, (POs) like politicians, governmental employees, and similar, for the purpose of discussing legitimate Novo Nordisk business, to participate in events organised or sponsored by Novo Nordisk or to provide bona fide services.
Third Party Representatives	We partner with Third Party Representatives (TPRs) like distributors and marketing agencies to help develop innovative solutions and make them available to patients.

What does it mean for me? Interacting with patients

- Focus on patients' best interests
- Treat patient information with respect and protect confidentiality
- Follow the established contracting and engagement process for both local and cross-border engagements
- Ensure proper disclosure of transfer of value
- Report any side effects or serious outcomes of our medicines

What does it mean for me? Working with HCPs, HCOs, POs and TPRs

When interacting with HCPs, HCOs, POs and TPRs:

- Ensure the interaction is based on a valid scientific and/or business purpose
- Ensure fair market value
- Be responsible, ethical, and transparent
- Disclose any potential conflict of interest
- Follow the established contracting and engagement process for both local and cross-border engagements
- Ensure proper disclosure of transfer of value
- Never engage with these stakeholders in order to gain an inappropriate advantage for yourself or Novo Nordisk
- Do not offer, give or receive gifts, or bribes
- Do not seek to inappropriately influence them

Responsible Sales & Marketing

We communicate to HCPs about our products to encourage their informed use so they can make the best treatment choices for the benefit of patients' health. The main purpose of the rules on promotion of medicinal products is to safeguard the health of patients.

We only promote Novo Nordisk products for approved uses in a manner that is truthful, accurate, non-misleading and balanced. We do not initiate or engage in conversations around the use of any Novo Nordisk products in private social settings, or on social media. This information should only be provided by HCPs or medical colleagues.

We share scientific information about our products to ensure that the medical community is fully informed, including providing information about new developments, product safety, and to follow laws and regulations. If you receive a question that is inconsistent with an approved product label or relates to a non-approved product, refer the request to the local medical department.

04 – Our Quality Culture

We deliver highest quality to patients

In Novo Nordisk, we have a Quality Mission stating: We deliver highest quality to patients. To patients is key as it indicates our commitment to our patients to always deliver safe products, that work as intended.

In Novo Nordisk, we strive to always improve the way we work and provide the highest level of care to our patients. Our Quality Mission is not just a statement, it is a promise we make to our patients every day, built around four key principles that guide everything we do:

Quality mission:

highest quality
to **Patients**

- We strive for simplicity
- We ensure compliance
- We are at the forefront
- We are all responsible

We are all responsible for pursuing this mission every day at work. To do so, comply with the requirements related to your job and actively take responsibility for quality in everything you do.

The Quality Management System (QMS) helps you with this:

The QMS is a dynamic framework that empowers us to manage quality effectively in our everyday work. It contains our processes described in procedures and helps us as employees to be competent and fully equipped to perform our work in compliance with industry standards.

Report a quality concern to the Compliance Hotline

We all have the responsibility to report suspected quality misconduct. This can be done in a secure and confidential manner through the Novo Nordisk Compliance Hotline.

If you have a concern about a possible breach of regulation or internal policies, the right thing is to report your concerns by either:

- Talking to your manager
- Reaching out to your local quality responsible
- Reporting to the Compliance Hotline or Ombudsman

Training and competencies

In Novo Nordisk, we value professional growth and development. We believe that training and competencies are essential components of our continued success as a company. Ensuring you are competent and adequately trained before performing healthcare regulated tasks is crucial for patient safety and is a requirement from health authorities. Therefore, before starting any new task or assignment, appropriate training must be completed.

We take training seriously and expect you to fulfil the assigned training before commencing work on the task and no later than the due date.

Your manager will ensure you have a current training plan outlining the required activities. Investing in your professional growth is an investment in the company's success, and we encourage collaborative efforts to achieve our training goals, meet deadlines, and uphold the highest quality to patients.

What does it mean for me?

- Make sure you are trained before you do your tasks
- Check ISOtrain on a regular basis to be on the forefront of your training
- When your responsibilities change, you must discuss with you manager the need for additional training or removal of training
- If you have worked out of compliance, you must contact your manager immediately

For more information type training/ in your browser or read Training Q174772. If in doubt, contact your manager or your Training Responsible Person.

Q&A:

Q: Why is Quality important?
A: Quality is a priority at Novo Nordisk because it is essential to safeguard our patients and maintain our license to operate. Therefore, as an employee, it is crucial that you understand both why and how to ensure quality in your daily work.

Q: What is GxP?
A: GxP refers to the regulatory requirements in the healthcare industry. These encompass health authority regulations that govern various activities throughout the product life cycle. In essence, GxP ensures that quality is ingrained in the products from research and development, guaranteeing that patients can rely on their safety and effectiveness. Compliance with these requirements is essential to obtain and uphold a marketing authorisation.

Q: How can I support Product Quality?
A: Report any error or change in our products, so it can be corrected or eliminated (see 'Report Customer Complaints' and 'React to deviations' sections).

Q: What does quality mindset mean?
A: Quality mindset means that you live by the Novo Nordisk Quality Mission. It refers to a mindset that prioritises and emphasises the aspects of our work, that can impact patients. It involves a commitment to consistently deliver on our patients' expectations through high-quality products and services. Quality mindset encompasses a focus on continuous improvement, compliance with standards and procedures, and driving simplicity based on what matters to patients. It also involves a proactive approach to identifying and addressing potential issues.

Further information and guidance:

- Novo Nordisk Quality Manual - Q166087
- Quality Manual eLearning (ISOtrain course 74255)
- Type quality/ in your browser
- If you are in doubt, contact your manager, QA or the local Quality Responsible Person.

Area-specific guidance

If you work in International Operations, click here [4.A]

If you work in Product Supply or CMC, click here [4.B]

If you work in R&D, click here [4.C]

If you work in North America Operations, click here

05 – Our Safeguards & Integrity

We protect ourselves, Novo Nordisk and society

Systems and technology

- Systems & technology are enablers that make it possible to support our business processes. Furthermore, they connect us and enable efficient collaboration and communication with colleagues, customers, and patients.
- All of us are using IT, and some of us are developing the IT solutions ourselves. You might not be in an IT department, but with increased access to digital platforms, all of us can develop digital solutions, such as apps, automation flows, and Business Intelligence (BI) dashboards.
- Remember all the good that technology gives us, but also:
    - be aware of digital risks such as fake emails, scams, and unauthorised software and online services. Follow the 7 principles of IT Code of Conduct
    - follow the IT Process and relevant SOPs, if you are developing or managing IT solutions, to ensure IT quality and compliance

What does it mean for me?

7 Principles in IT Code of Conduct

Follow these to **protect yourself and Novo Nordisk**. Click on each of them to learn more.

1. Only use Novo Nordisk equipment
2. Connect securely
3. Work securely
4. Don't download
5. Don't upload
6. Protect information
7. Act on security incidents

For more information, including Q&A, type ITsecurity/ in your browser or read IT Code of Conduct [Q127938].

IT quality & compliance

Follow the IT Process, when **developing or managing IT solutions**, incl. digital solutions, to ensure that the IT solutions are fit for intended use, of high quality, in control, and comply with regulatory requirements. To do so:

- Follow the relevant IT SOPs
- Find guidelines/templates on the IT&Q portal
- Follow 'Ownership of IT systems and IT infrastructure' (Q187218), if you own an IT solution
- Obtain an overview of the IT solutions in your area and ensure that your employees receive the necessary training, if you are a people manager

Note: even a simple IT solution of low criticality could potentially harm Novo Nordisk, e.g., by acting as a gateway to other IT solutions.

Information and data use

We work to solve global health challenges. That requires innovative approaches, including digital health and data-driven solutions. Our data ethics standards help us build a trustful relationship with colleagues, partners and patients.

We take seriously the responsibility of safeguarding personal data and confidential information.

We respect intellectual property rights, including third parties' rights, as well as data and information related to our business activities, our products and our patients. Since many of us have access to confidential information, we must ensure it remains confidential by only using approved, company-provided solutions in alignment with our policies and procedures.

What does it mean for me? Personal data protection

When working with personal data, you must follow Novo Nordisk's 5 principles for handling personal data:

1. Use the least amount of data needed
2. Inform people how we use their data
3. Only share data with those who need to know, or by consent where required
4. Store data securely
5. Delete data when no longer needed

For more information and support go here. If you suspect a data breach, contact the Compliance Hotline immediately.

Data and AI ethics

At Novo Nordisk, we have adopted a set of Data and AI ethics principles to support ethical decision-making when using data across the value chain. The principles draw on established concepts in privacy, bio- and healthcare ethics, human rights, and business ethics to ensure we work with data in a way that maximises benefits and minimizes harm for individuals and society.

Data and AI ethics

The Data Ethics principles cover all types of data collected, analysed, stored, shared, and otherwise processed. Click on each of them to learn more.

The AI Ethics principles are relevant and apply to all forms and use of AI including, but not limited to, research and business operations. Click on each of them to learn more.

7 Data Ethics principles:

1. Autonomy
2. Transparency
3. Data quality
4. Fairness and non-discrimination
5. Ethics by design
6. Responsible data sharing
7. Responsibility and accountability

6 AI Ethics principles:

1. Empowering humans
2. Accountability
3. Human control
4. Fairness and minimization of bias
5. Privacy, security, and safety by design
6. Transparency, explainability and ethical use

For more information on Data and AI ethics principles go here.

Security

Each of us plays a role in ensuring that we have a secure workplace by complying with security procedures and guidance. It is important not only at our sites, but also during travel and events. Make sure you are aware of all applicable security protocols and follow the relevant security requirements. If it is safe for you to do so, then you are expected to challenge unsecure behaviour or situations that may pose a threat (For product safety - see section 3).

What does it mean for me? Security

All employees are expected to:

- Visibly wear you Novo Nordisk ID Card while on a Novo Nordisk site. Present your access card if requested to. Immediately notify your manager is you lose your access card
- Only enter areas you're approved for and never allow access to Novo Nordisk sites to unauthorised individuals
- Report any suspicious behaviour, security concern, and opportunity for improvement to your local Security Champion or, if unable to so, to Global Security
- Support security investigations in a transparent and timely manner

When you travel:

- Ensure you have downloaded the International SOS App and have fully read all guidance relating to your destination – available here
- Contact your Regional Security Adviser should you have any queries surrounding travel security, or have any concerns about your destination country

If you need a security advice, contact your local Security Champion or globalsecurity@novonordisk.com.

In case of an urgency or a serious situation or crisis, contact the Alarm Response Centre (+45 44 42 00 00) available 24/7.

The latest Global Security guidelines and recommendations can be found here.

Record keeping

We record, report and retain all information accurately and completely in order to protect our credibility. We never falsify company records. We document and record information in harmony with laws, requirements, and company policy – locally and globally.

Fair Competition

We value our relationships with suppliers, customers and competitors, and we respect and comply with laws that govern those relationships. We value competition and never restrict it, and we do not fix prices or terms for our competitor products. We compete fairly and do not speak badly about our competitors or make unfounded claims.

What does it mean for me? Fair Competition

- Do not share confidential business information with competitors
- Speak up, inform your manager, and involve Legal Compliance, if you receive or become aware of competitor information that was obtained unethically

Sanctions & Export Controls

Novo Nordisk provides essential medicines and medical devices to patients worldwide, including in countries that are subject to certain sanctions and export controls. We are committed to complying with all applicable sanctions and export controls to ensure access to patients and sustainable operations. We are all responsible for sanctions and export controls compliance at Novo Nordisk, and we do not ignore "red flags" or indicators of non-compliance.

What does it mean for me? Sanctions & Export Controls

- Read the Sanctions & Export Controls SOP and resources on SharePoint
- Do not engage in transactions with sanctioned parties. If you identify a potential or current transaction that may involve a sanctioned party, you must stop interactions and immediately contact Legal & Compliance
- Contact Legal & Compliance if you have concerns regarding sanctions or export controls risks

Communication & Social Media

We let our professional Media Relations and Investor Relations colleagues communicate on our behalf. We only use channels that are approved by Novo Nordisk and only communicate when relevant stakeholders allow us to.

Social media, such as Facebook, LinkedIn, and X, has changed the way we interact and communicate with the world. At Novo Nordisk, we apply the same ethical mindset to social media and digital communication as everything else. We never use social media – or any other media channel - to improperly promote Novo Nordisk products.

Most of us have a social media presence of our own. When using social media privately, we must act and behave in accordance with our shared values, laws, and regulations. Remember not to promote our products on social media.

Our brand, image and reputation are dependent on how we are perceived by our patients, employees, customers, and the public. We are confident that all of us at Novo Nordisk act and behave in alignment with OneCode.

What does it mean for me? Communication and media

- Contact Media Relations or Investor Relations if you receive a request for information or comment on behalf of Novo Nordisk
- Never speak 'off the record'
- Do not promote Novo Nordisk products on social media or any other media where it is not permitted

Sustainability

We want to play a leadership role in helping solve environmental and climate challenges, and to ensure compliance with external requirements. We will continuously minimise our use of resources, such as energy, water and raw materials used in Novo Nordisk.

We are on a mission towards zero environmental impact, despite globally increasing production. To get there, we embrace a circular mindset – eliminating waste and pollution, designing and producing our products so that the materials can be recovered and reused, and reshaping our business to minimise consumption and eliminate waste by turning it into new resources. Actions are key to our success, and we act daily in accordance with the ambition of having zero environmental impact.

What does it mean for me? Sustainability

- Integrate environmental considerations in your daily operation
- Make sure you sort out waste
- Eliminate waste of energy, water & materials in our daily operations
- When contributing to the design of our products and production facilities - design for sustainability and circularity
- Educate yourself via the Circular for Zero Academy

Ethics & Compliance

Novo Nordisk follows laws, regulations, industry codes, and strictly prohibits any form of bribery and corruption by both its own employees and business partners. We never offer, give or receive incentives to improperly influence others or to undermine their independence.

We ensure the integrity of our business transactions by keeping documents and records organised, accurate and complete. To ensure this, we conduct internal audits providing objective assurance of financial processes, IT security, ethics and compliance, quality and ESG processes.

We make decisions based solely on objective criteria and professional judgement, and are never improperly influenced by our personal, social, financial or political interests. Our decisions are based on what is best for Novo Nordisk and our patients, rather than any personal advantage.

What does it mean for me? Ethics & Compliance

- Ensure that business-related documents are accurate, truthful and complete
- Ensure that business decisions are free of personal interest
- Disclose any potential conflict of interest to your manager
- Do not provide or receive bribes or improper advantages
- Do not steal funds, inventory or assets from Novo Nordisk
- Do not falsify, misuse, manipulate expenses or financial information
- Follow our ethics & compliance requirements (Type TEN/ in your browser) and educate yourself via the Ethics & Compliance Academy

Insider trading

Novo Nordisk's shares are listed on NYSE and Nasdaq Copenhagen, and we collaborate with other companies, whose shares are also listed. We adhere to all applicable securities laws and do not engage in insider trading nor enable others to engage in insider trading. More information can be found here.

What does it mean for me? Insider trading

- Only share information that could affect the share price with people who needs it for genuine business purposes, and who are on an insider list
- Do not trade or assist others in trading shares based on information that could affect the share price

06 – Our Speak-up Culture

We rely on you to do the right thing and never compromise on quality and ethics. That is an important way for you to contribute to Novo Nordisk in driving change to defeat serious chronic diseases. We share Novo Nordisk's purpose, and the ambition to make it real.

How Novo Nordisk performs is the sum of how each of us acts. Your actions are within your control, and how you behave is crucial to how we succeed as a team at Novo Nordisk. These actions define high-level the behaviours we want to lead with, see and support.

Ethical decision-making is a skill, that we continuously train and improve at Novo Nordisk. OneCode is a part of that, but success is determined by how we act every day, and how we help each other develop. Speak up when you need help, help when others speak up.

Our culture is rooted in openness, accountability and respect. When you speak up or listen, it strengthens our culture. You must speak up whenever you have questions, doubts, ideas or concerns. Speaking up helps us grow.

Violating relevant laws, regulations, or OneCode, or encouraging other to do so, puts both you and Novo Nordisk at risk. Appropriate disciplinary actions will be taken against any employee or business partner whose actions violate this Code, our values or any policies of Novo Nordisk.

Your actions lead the way, and if you report a concern in good faith, you will find support and trust. All reports remain confidential when possible. You can also choose to report anonymously to the

Compliance Hotline and engage in a dialogue. All reports are investigated, and appropriate action taken, for example training or disciplinary sanctions. When speaking up or by supporting an investigation, you are protected by our non-retaliation policy. You should always refuse to do anything that violates OneCode, even if it means going against your manager's instructions or resulting in loss of business for Novo Nordisk. That is how your actions are a key part of defining the behaviour of Novo Nordisk.

What does it mean for me? Speak-up

Report any actual or possible violation of law or behaviour inconsistent with OneCode, our values, or our policies.

You report concerns by either:

- Talking to your manager
- Reaching out to Legal, Ethics & Compliance or People & Organisation
- Reporting to the Compliance Hotline or Ombudsman

Area-specific guidance (Quality)

04.A – Quality in International Operations

Customer Complaints

We take customer feedback seriously and are committed to ensuring that our products and services meet the highest standards of quality. If you receive a customer complaint, you must report it to our safety/customer complaint department within 24 hours, so that we can take appropriate action. Customer complaints may include reports of adverse events, technical complaints, and a combination thereof.

Examples of adverse events (see examples in 'Report Safety Information' section)

Examples of technical complaints:

- The device cannot deliver correctly
- The product is leaking
- The packaging material has a strange colour

You can receive complaints from patients, relatives, pharmacies, HCPs, wholesalers or health authorities. Once reported, each customer complaint is evaluated in the Customer Complaint Centre (CCC) and appropriate investigations are initiated and performed.

Further information and guidance:

- Handling Customer Complaints - Q008782

- Type CCC/ in your browser
- If you are in doubt, contact your local Safety/Customer Complaint department

Q&A:

Q: Is there a difference between customer complaints and safety information?
A: Yes. Safety information also contains information that do not claim any issue with the quality of the product (e.g. pregnancy).

Q: Why do I need to report customer complaints?
A: It is a regulatory requirement that Novo Nordisk captures and investigates customer complaints. They are used to continuously improve the quality of our products and hereby improve customer satisfaction. It also safeguards patient safety and product quality.

Q: Can one customer complaint lead to a potential recall situation?
A: Yes. A single customer complaint can lead to a potential recall or even a recall situation.
If action is required by you in relation to a potential or an actual recall situation, you will be contacted by CCC.

React to deviations

In Novo Nordisk, we take deviations from GxP processes very seriously. A deviation occurs when a specified requirement is not met, such as errors on labels, promotional material, missed deadlines or mishandling of samples. It is crucial that we react quickly and effectively to deviations to protect product quality, ensure patient safety, comply with GxP requirements and ensure continuous improvements.

If you discover a deviation, the first step is to stop and correct it, if possible. Then you should immediately contact your manager and/or the Quality Responsible Person in your area. By reporting the deviation promptly, we can take appropriate action to correct the issue and prevent it from happening again in the future.

Example: A sales representative visits a doctor and provides the doctor with a brochure with safety data on the new Novo Nordisk insulin. The next day, the sales representative revisits the brochure and realises that he does not have the latest version and that there is a new version. He has distributed the outdated brochure on all his visits during the last month. He makes a quick correction by separating the old brochures from the new ones. Immediately after, he contacts his manager and/or Quality Responsible Person and reports what has happened. The relevant person takes the case from here – if more information is needed, he will be contacted.

! If you handle samples requiring refrigeration, immediately report any temperature deviations (temperature outside limits) that may occur during storage or distribution of samples. The deviation may be critical for product quality and patient safety.

Further information and guidance:

- Deviations - Q205479
- Type deviation/ in your browser

- If you are in doubt, contact your manager or the local Quality Responsible Person

Q&A:

Q: Why is it important to report a deviation?
A: Any deviation may potentially impact patient safety, product quality and compliance and in addition it could have a negative impact on the reputation of Novo Nordisk.

Q: Should I report the deviation even if I have been able to fix the error?
A: Yes, it is important. It is not to blame employees; it is important to document what has happened and to ensure an improvement process is started to make sure the deviation does not happen again for you or your colleagues.

Control changes

Changes are needed to allow improvements of our products and systems, and to allow necessary corrections and preventions. At Novo Nordisk, we control all changes in GxP processes to ensure that changes are introduced in a controlled manner and do not introduce any risks. However, the level and formality of change control depends on the potential impact of the change on product quality, patient safety, the validated state and regulatory/authority documentation.

Before you implement any change in a GxP process or in an ISO 9001 certified area, talk to your manager or Quality Responsible Person to verify how change control should be applied and if the change requires a Change Request. Example: A new agreement must be established between Novo Nordisk and a distribution supplier. Should this be controlled via a Change Request? Yes. It is necessary to prepare and approve a Change Request to create and update agreements between Novo Nordisk and suppliers of distribution services. In this case, a Change Request must therefore be filed in novoGloW. Other examples of changes that require change request:

- Change of archive location
- Disposal of refrigerator
- Discontinuation of marketed product

Further information and guidance:

- Change Control - Q220205
- Type changecontrol/ in your browser
- If you are in doubt, contact your manager or the local Quality Responsible Person

Q&A:

Q: Why is it important to control changes?
A: When making a change, the change control process ensures that the potential impact on patient safety, product quality or compliance is assessed.

Q: When is the use of Change Control not mandatory?
A: Formal change control is not required for processes outside the GxP domain, such as Finance or Communication. You can find further exemptions from Change Control in Q220205.

Q: I am handling HCP agreements; does it require a change request?
A: No. HCP agreements do not require a change request.

Use Quality Risk Management

In Novo Nordisk, we are committed to ensuring that the products we deliver to our patients are safe to use. One of the ways we achieve this is by employing Quality Risk Management in our operations. Quality Risk Management helps us asses and control risks and share knowledge across our organisation to drive continuous improvement in our Quality Management System.

What is Quality Risk Management and why is it important?

Quality Risk Management is not about taking risk, but rather reducing risk to an acceptable level and safeguarding product quality and patient safety. By using this approach, we can avoid taking risks that could harm our patients, lead to recalls, or result in scrapping of products.

How do we do Quality Risk Management?

To implement Quality Risk Management, we focus on a variety of different activities that take different shapes and forms depending on the specific problem or question that we are addressing. However, the principles are always the same, and we always answer the following four questions:

1. What might go wrong?
2. What is the likelihood it will go wrong?
3. What are the consequences?
4. What can we do to prevent or control the risk?

By answering these questions, we can document our knowledge and use it to make informed decisions throughout the lifecycle of the product. When something does happen, the knowledge gained from the four questions helps us take appropriate action.

What is my role and responsibility? You play an important role in all of this. You should help ensure:

- That we use our knowledge and keep our risk assessment up to date
- That controls are in place and are used
- That you act when something happens
- Document your decisions

Further information and guidance:

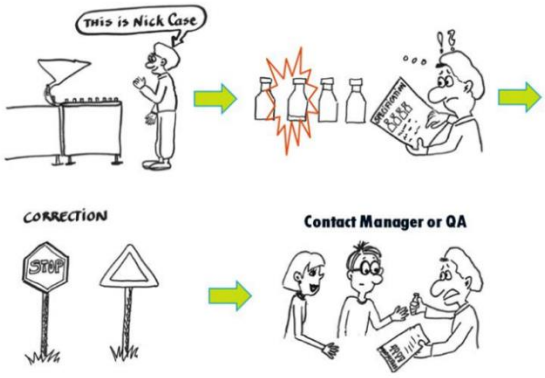
- Quality Risk Management in Novo Nordisk – Q176354
- Write QRM/ in your browser

04.B - Quality in Product Supply & CMC Development

React to deviations

A deviation is when a specified requirement is not fulfilled. You must know how to react to deviations in GxP processes. The purpose is to protect product quality, patient safety, comply with requirements and ensure continuous improvements. If you discover a deviation, take immediate action to stop it and contact your manager and/or QA. By reacting quickly and effectively to deviations, we can ensure high-quality products and services and uphold our commitment to patient safety.

Example: This is Nick Case. He works at a filling station. One day he observes a filled vial that deviates from the specification. He makes a quick correction by taking the item off the line and stopping the line. Immediately after, Nick contacts his manager, the person in this department dealing with deviations and/or QA and reports what has happened. The relevant person takes the case from here – if Nick is needed, he will be contacted.

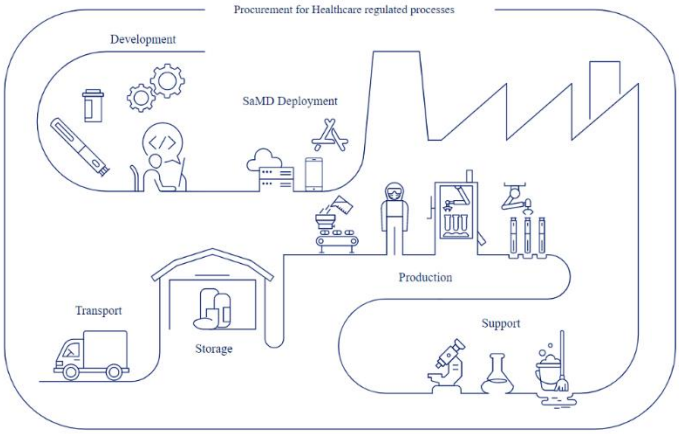


Further information and guidance:

- Deviations - Q205479
- Type deviation/ in your browser
- If you are in doubt, contact your manager or your QA

Purchasing goods and services

In Novo Nordisk, we are committed to being mindful when purchasing goods or services. If you need to order goods or services, you must first consider what they will be used for. If the goods or services will be used in a process regulated by GMP/GDP/Devices requirements, then the Procurement for Manufacturing process applies. It is crucial that the goods or services ordered are suitable for use and that controls appropriately reflect the risks of the procurement. If you are in doubt about how to assess this, you must contact your manager or your Local Sourcing Responsible.



Examples of goods and services in scope include raw materials, tools and equipment, gowning, cleaning services, transportation services, and outsourced activities.

If the goods or services will be used outside of processes regulated by GMP/GDP/Devices requirements, you can find what you need in Coupa, Novo Nordisk's procurement and contracting systems. By being mindful of our purchasing decisions, we can ensure that we are using appropriate goods and services for our processes, upholding our commitment to quality, and ultimately ensuring the safety of the patients.

Find more details:

- Procurement for Manufacturing - Q019443
- Type pfm/ or coupa/ in your browser
- If in doubt, contact your Local Sourcing Responsible

Maintain good housekeeping

It is important to keep our facilities and equipment clean and tidy in order to ensure compliance with Good Manufacturing Practices (GMP) and to protect our products and samples against contamination. Pay special attention to cleanness in controlled areas as it can impact the quality of our products.

What does it mean for me? Maintain good housekeeping

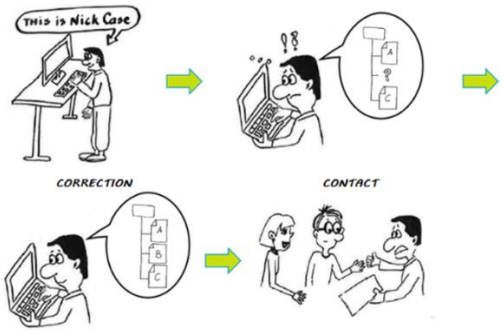
- Inform your manager, if you observe damage, discoloration, paint peeling off, rust or dirt on surfaces
- Dispose of waste regularly and place it in designated waste containers
- When you have finished using tools and equipment, ensure they are clean and put them back
- If you observe liquid on the floor, find out if it is safe to wipe it up yourself or if it requires specific security equipment to do so
- If you observe cables on the floor, place them correctly in a cable tray or inform the relevant colleague
- Keep doors and windows shut to prevent pests like rodents, birds and insects from getting in and to control the indoor environment
- If you see misplaced pest indicators, make sure that they are put back to the location marked on the wall (parallel to and up against the wall and with the hole not blocked)
- If you see pests outside indicators, immediately contact the pest control responsible person in your department/area

04.C – Quality in Research & Development

React to deviations

Deviations from GxP processes can occur when a specified requirement is not fulfilled. Reacting to these deviations is crucial to protect product quality, patient safety, comply with requirements and ensure continuous improvements.

If you discover a deviation, take immediate action to stop it and contact your manager and/or QA. By reacting quickly and effectively to deviations, we can ensure high-quality products and services and uphold our commitment to patient safety.



Example: This is Nick Case. Nick must archive and index relevant documents in an IT system. One day Nick discovers that a document is not in the system. He makes a quick correction by archiving and indexing the document as required. Immediately after, Nick contacts the person dealing with deviations in his area. Nick delivers the documentation for his correction and hands over any other

relevant information. The person handling deviations will take the case from here. If Nick is needed, he will be contacted.

Further information and guidance:

- Deviations - Q205479
- If you are in doubt, contact your manager or your QA

Control changes

Changes are needed to allow improvements of our products and systems, and to allow necessary corrections and preventions. At Novo Nordisk, we control all changes in GxP processes to ensure that changes are introduced in a controlled manner and do not introduce any risks. However, the level and formality of change control depends on the potential impact of the change on product quality, patient safety, the validated state, and regulatory/authority documentation.

Before you implement any change in a GxP process or in an ISO 9001 certified area, talk to your manager or QA to verify how change control should be applied and if the change requires a Change Request.

Further information and guidance:

- Change Control - Q220205
- Type changecontrol/ in your browser
- If you are in doubt, contact your manager or your QA

7 principles of IT Code of Conduct

1. Only use Novo Nordisk equipment

Only connect Novo Nordisk approved equipment and mobile devices to Novo Nordisk computer networks. Unapproved and private equipment may be connected to Novo Nordisk guest networks.

Privately owned equipment such as computer mouse, keyboards, and web cameras are allowed to be connected to Novo Nordisk computers only if the private equipment does not have storage facilities. If the privately owned equipment does not work with standard drivers, then use Novo Nordisk approved equipment.

All files must be stored in approved content repositories or file storage locations (for example, department/project shared drives, SharePoint or OneDrive). Only approved USB devices with storage facilities purchased using the Novo Nordisk procurement and contracting system Coupa or equivalent are allowed. If the Coupa system or equivalent is not available in the area, please use local purchase policy. It is not allowed to connect approved USB devices with storage facilities to private IT equipment.

Do not share Novo Nordisk equipment with anyone who is not authorised to use Novo Nordisk equipment. A person is authorised to use Novo Nordisk equipment if the person has a signed contract with Novo Nordisk and the IT Code of Conduct is part of the contract agreement.

Private use of Novo Nordisk IT equipment and mobile devices is permitted to a limited extent but must not include any activity in conflict with Novo Nordisk Ethics & Compliance standards.

Private content must be **marked as "private"**. Private e-mails must include "private" inserted into the subject field and folders must be named private.

Private content must not be placed in any shared resources.

All data transmitted and stored on Novo Nordisk systems belong to Novo Nordisk and Novo Nordisk has ownership of data protection and retention.

To the extent permitted by law, Novo Nordisk reserves the right to **continuously monitor** the use of Novo Nordisk IT systems, computers, and mobile devices. This monitoring is used for security reasons to safeguard Novo Nordisk information.

It is allowed to install **applications for personal use on mobile devices** and take personal pictures. However, users are responsible for their own data, including backing up such data. If required, Novo Nordisk can initiate that all data will be deleted on mobile devices.

Always **lock devices** when leaving it unattended and do not leave the device unattended when outside the office premises, for example, in a taxi or at a café.

All Novo Nordisk **equipment that is no longer in use** must be securely disposed in an environmentally sound manner. Inform your manager of any Novo Nordisk equipment that is no longer in use and therefore must be securely disposed.

Equipment containing information under legal hold must follow the rules defined in *[Protecting and handling information - Q190751]*.

2. Connect securely

When using Novo Nordisk equipment, including computers and mobile phones, **avoid connecting to "open networks"** (a network without password protection) in for example, airports, hotels or coffee shops. Preferably you should use your mobile phone as wireless hotspot instead of using "open networks".

3. Work securely

When you receive messages via email, SMS, or Teams, handle external links and attachments with caution. It is recommended to show the real web address by hovering over the link (on iOS, tab the link and hold down), and to check if the sender's name and email address match. Report suspicious emails via the "Report a phish" button in Outlook.

Received e-mails asking to share any **sensitive or internal company information**, such as passwords, should be reported to IT Security by using the Report a Phish button in Outlook.[Phishing Information]

Browsing **illegal sites** or sites containing objectionable material, for example, pornographic material, racist material, or illegal software is prohibited. Storage of such material on Novo Nordisk IT equipment including personal spaces and files is also prohibited.

A **non-standard application** is an application which has not been approved for use on the Novo Nordisk network or is not a part of the Novo Nordisk software portal. If individuals install a non-standard application, it is the responsibility of the individual to ensure that Novo Nordisk information is protected, and Novo Nordisk systems are not put at risk for example by ensuring that the non-standard application is being kept up to date.

If using **cloud services** which are not provided by Novo Nordisk, it must be ensured that Novo Nordisk information is protected, for example by applying proper user management. The usage of a cloud services might be denied with no previous notice.

Novo Nordisk **servers and other infrastructure equipment** must only be used for business purposes. Web browsing and other internet access, for example, access to e-mails not in scope for business purposes are not allowed from servers or other infrastructure equipment. This also applies to cloud services of all kinds.

4. Don't download

Always respect **software licenses** or information protected by **copyright laws**. This includes illegal streaming and downloading of copyright protected music, radio- or TV-transmissions or video files.

5. Don't upload

When using **social media**, do not discuss internal or confidential matters. Be aware that sharing any content (text, pictures, video etc.) can have a long-lasting impact on Novo Nordisk's reputation.

Do not share **Novo Nordisk internal information** such as pictures of ID and access cards, computer systems and physical security (for example, door locks, CCTV's - Closed-circuit television, also known as video surveillance, alarm systems) or any other internal information.

Always adhere to the Novo Nordisk social media guideline.[Social Media Guidelines]

It is not allowed to transfer or automatically forward Novo Nordisk information to **cloud or e-mail services** (for example, Gmail, Dropbox, etc.) that are not approved by Novo Nordisk.

Do not use online services for example, translation services that are not approved by Novo Nordisk, with Novo Nordisk classified information. [Protecting and Handling information – Q190751].

6. Protect Information

A Trade Secret is any Novo Nordisk non-public, confidential information of commercial value that Novo Nordisk takes reasonable steps to keep confidential and that provides Novo Nordisk a competitive advantage.

Novo Nordisk protects and maintains the confidentiality of its Trade Secrets through ongoing obligations established in Novo Nordisk procedures that are applicable to employees and third parties, including physical and IT security measures. A Trade Secret needs to be maintained in secure

manner and shared only on a need-to-know basis within Novo Nordisk and with third parties. See [Guideline Measures for Protecting Trade Secrets].

Ensure that exchange of classified information with external third parties is allowed and is done securely, adhering to the confidentiality agreement between parties.

Confidential data must be **encrypted** according to the data classification rules in [Protecting and handling information - Q190751]. Unencrypted storage of confidential information on USB sticks, DVDs or other removable media should only be used when encryption is not possible, and unencrypted storage must be kept physically secure.

Printed material with classified information must not be left unattended and must be properly destroyed after use.

Ensure that exchange of classified information with **external persons or organisations outside Novo Nordisk** is allowed and is done securely, adhering to the confidentiality agreement between parties.

Novo Nordisk **passwords** are personal and secret and must not be shared with anyone, written down or saved in password vaults, except in solutions approved by Novo Nordisk. Passwords must not be easy to guess and must be different from passwords you use outside Novo Nordisk. When creating a password, a good way to create a strong and memorable password is by using 3 random words. For example, short hot building is an example of a passphrase that is easy to remember and easy to type.

If you are notified or suspect that any of your passwords have been revealed, immediately take action to change the password, and report the problem to the local IT department or Service Desk.

Software security updates must be installed as instructed. If you have installed non-standard IT applications, you are responsible for installing the needed security patches in due time after release. Security applications and services installed by Novo Nordisk must not be changed unless approved by Global Information Security.

7. Act on security incidents

If suspecting that a computer has been infected by malicious software, i.e. **malware, for example computer virus**, immediately shutdown the computer and contact the local IT department or Service Desk. Do not power on the computer unless approved by the IT department or Service Desk.

An **IT security incident** is defined as a situation indicating actual harmful destruction, alteration, or disclosure of Novo Nordisk information or IT systems, or a violation of IT security requirements.

All actual or suspected IT security incidents and possible vulnerabilities must be reported to the local IT department or the Service Desk.

7 Data Ethics principles

1. Autonomy

Respect individuals' privacy, protect their rights, and honour confidentiality. Data should be collected and used in ways that are consistent with the intentions and understanding of the individual. Best efforts should be made to make individuals aware of how their data will be used and, where appropriate and possible, offer them choices about who has access to their data and how it may be used.

2. Transparency

Individuals should be able to understand how their personal data are used. Individuals should be informed, in a manner that is appropriate and understandable to the relevant audience, regarding:

- the type and extent of data collected about them,
- how it will be used (including, to the extent possible, secondary uses of data),
- how technologies are used to aid databased decisions that impact them,
- how their rights (including the right to privacy) are protected, and
- what actions they may take to exercise their rights.

Legally permissible limitations on such rights should be clearly explained. Data governance standards and practices should be made available for public review, when appropriate.

3. Data quality

The best quality data available should be used to make decisions. Data use should include processes to identify, prevent, and off-set poor quality, incomplete, or inaccurate data. When data quality, completeness, or accuracy presents risks of bias or harm to the individual, processes for the mitigating these risks should be pursued and documented.

4. Fairness and non-discrimination

Data acquisition should be inclusive, equitable, and seek to support the industry's mission of responding to the needs of all patients. Engaging a diverse set of stakeholders in decision-making around data use and development of technologies to leverage data can build trust and support efforts to eliminate harmful biases. Technologies leveraging data should also include data-driven processes for quantifying the potential for bias in the populations in which they are being deployed.

5. Ethics by design

Controls to prevent harm and risks to individuals should be built into the design of data architecture and data processing. This includes having processes in place to identify, assess, and mitigate risks of

intentional and unintentional discrimination and bias, breaches in privacy and security, physical harm, and other adverse impacts on individuals.

6. Responsible data sharing

Data sharing should be based on processes that actively and consistently consider, prioritise, and protect individual rights. Data should always be obtained by legitimate means, and there should be designated individuals accountable for protection and confidentiality of data. Third parties working with IFPMA members should be informed about and expected to adhere to these principles. In addition, data interoperability initiatives should prioritize, include, and support ethical and responsible data sharing practices.

7. Responsibility and Accountability

Data Ethics Principles should be operationalized through effective governance, clear standards, training, monitoring activities, and disciplinary sanctions. Senior management should be aware, and ensure the application, of ethics principles in decisions around the use of data in strategic activities.

6 AI ethics principles

1. Empowering Humans

AI systems should be designed and utilized with the idea that the use of AI needs to respect the rights and dignity of all people. When developing AI systems, we will consider both the societal benefit and any impact to individuals. Where applicable, the responsible individual or organisation should strive to utilize AI as a means by which those impacted by AI can retain control of their own healthcare according to their evolving needs.

2. Accountability

Accountability for the use of AI systems, including those developed by third parties, throughout the lifecycle of AI. This includes establishing proper governance, appropriate deployment of risk and impact-based controls, and incorporation of strategies for any unintended negative consequences of AI systems, including continual monitoring and feedback loops as AI evolves over time.

3. Human Control

AI systems should be deployed with an appropriate level of human control and oversight, based on the assessed risk to individuals. Where there is a potential for direct and significant impact on individuals because of deploying AI, AI should not be given complete autonomy in decision making.

4. Fairness and minimisation of bias

Developers and owners should strive to minimize bias and maximize fairness in AI systems. Any development of an AI system should include a process to review selection of datasets used in

training and assumptions used in the design to evaluate if those assumptions minimize any bias of the developer or a bias that is present in the data, design, or architecture the developer has relied upon. Continuously monitoring and adapting AI systems to correct for bias throughout the AI lifecycle, hereunder ensuring diversity among the designers and developers of AI.

5. Privacy, Security, and Safety by Design

Privacy and security should be considered as part of the design of any AI system by implementing adequate measures to mitigate risks to the privacy, security, and safety of individuals, including where relevant, compliance with applicable data protection regulations and technical limitations on the re-use and use of data, and state-of-the-art security and privacy-preserving measures, such as pseudonymization, anonymization, or encryption.

6. Transparency, Explainability, and Ethical Use

When deploying AI, it should be described, to the extent possible and where appropriate, when and how AI is used; how personal data, if any, is used; the goals, underlying data and any limitations of such data, and assumptions that power a given AI system; and the limitations of that system. When using non-explainable AI in a context that has the potential for direct and significant impact on individuals, we must ensure extra focus on transparency, human control, and elimination of bias.