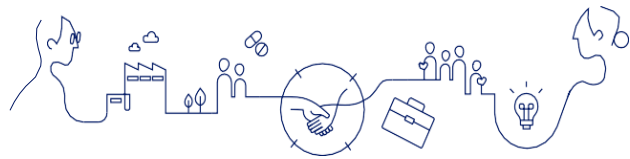


2025  
Novo Nordisk  
Human Rights Report



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*'At Novo Nordisk, respecting human rights is fundamental to how we create sustainable value and earn trust across society.'*

*As leaders and employees, we share a collective responsibility to understand and address our potential human rights impacts, to act with integrity in our decisions, and to ensure that respect for people remains embedded in how we operate, partner, and innovate.'*

Maziar Mike Doustdar  
President & CEO, Novo Nordisk

# Policy Commitment

## Our Human Rights Commitment

Novo Nordisk is committed to meeting our responsibility to respect human rights throughout our operations and value chain, in line with the [UN Guiding Principles on Business and Human Rights](#) (UNGPs) and the [OECD Guidelines for Multinational Enterprises](#). This commitment is anchored in our [OneCode](#), which sets the ethical foundation for how we conduct business and make decisions. Our [Human Rights Commitment](#), endorsed by our President & CEO and the Chair of the Board of Directors, references all internationally recognised human rights, including the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. The Human Rights Commitment is aligned with the UNGPs and the OECD Guidelines for Multinational Enterprises. This alignment reflects Novo Nordisk's long-standing support for the principles of the UN Global Compact, to which the company has been a committed signatory for many years.

Our Human Rights Commitment guides the design of our human rights due diligence process. This includes a due diligence policy that establishes clear expectations for our operations and affiliates and requires our first-tier business relationships to uphold human rights. Additionally, it requires them to ensure that their own business relationships also adhere to these standards, in line with our [Responsible Sourcing Standards](#) (RSS). When applying our due diligence process, we also consider mandatory human rights and labour legislation in relevant jurisdictions, such as the UK Modern Slavery Act, Canadian Modern Slavery Act, the Australia Commonwealth Modern Slavery Act<sup>1</sup>, the Norwegian Transparency Act and relevant import bans such as the U.S. Uyghur Forced Labor Prevention Act.

The Human Rights Commitment applies to all individuals who may be impacted by our activities, including patients, employees, people working in our value chain, and community members. We pay particular attention to the rights of vulnerable groups, such as children and patients. To embed this commitment in daily practice, all employees and managers must follow our Corporate Human Rights Requirements, which translate our expectations into concrete guidance on how to identify, manage, and escalate potential human rights impacts in their work.

### Novo Nordisk Corporate Human Rights Requirements

1. **Avoid causing or contributing** to negative human rights impacts in all business activities
2. **Set human rights expectations** to our business partners according to the UN Guiding Principles on Business and Human Rights, with a focus on high-risk activities
3. **Report human rights concerns** to the Novo Nordisk Compliance Hotline
4. **Prevent and mitigate recurrence** of actual negative human rights impacts and **provide for remedy** where necessary

### Corporate human rights requirements

Novo Nordisk's human rights expectations to employees are stated in our Corporate Human Rights Requirements. All employees and managers are required to exercise respect for human rights in daily decisions and actions.

<sup>1</sup> Please see Novo Nordisk Modern Slavery Statement 2025 [here](#).

## Novo Nordisk at a Glance

Novo Nordisk is a leading global healthcare company, founded in 1923 and headquartered in Denmark. Our purpose is to drive change to defeat serious chronic diseases. We do so by pioneering scientific breakthroughs, expanding access to our medicines and working to prevent and ultimately cure disease.

In 2025, we reached an all-time high of 45.6 million people with our obesity and diabetes care products. At the same time, the number of vulnerable patients reached with our diabetes products decreased by 15% compared to 2024, driven primarily by reduced insulin tender sales following portfolio consolidation. Despite this, we remain committed to improving access and affordability for vulnerable populations through targeted programmes, product innovation, and patient-centred support.

Novo Nordisk continues to strengthen efforts to support people facing affordability or access challenges through patient support programmes, direct-to-patient solutions and expanded telehealth partnerships. Our key prevention initiatives include the relaunch of Cities for Better Health and a Childhood Obesity Prevention Initiative in underprivileged urban areas. Through our long-standing Changing Diabetes® programme, we have reached 468,000 children since 2009 and aim to reach 100,000 more by 2030.



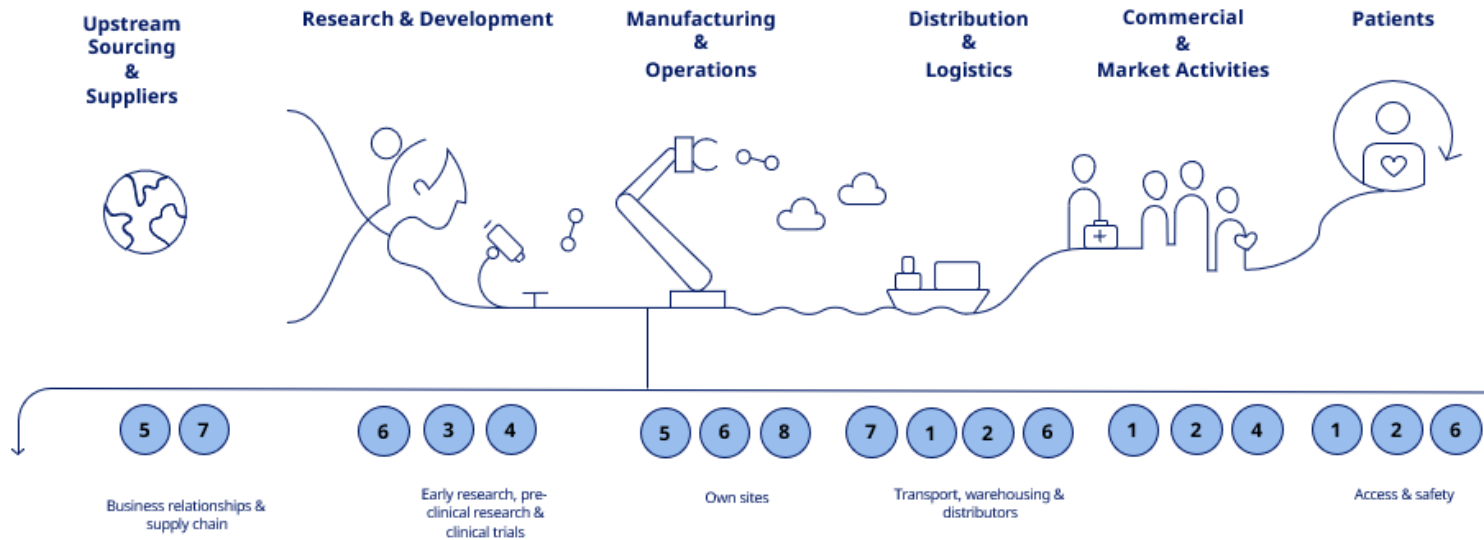
(As of 4 January 2025)

# Salient Human Rights Risks

The salient human rights risks presented in this report reflect the most severe actual and potential human rights impacts identified through Novo Nordisk’s ongoing human rights due diligence. Salience is determined based primarily on the severity of impacts on people, considering the scale, scope and irremediability of harm, as well as the presence of vulnerable or at-risk groups. The assessment covers impacts across own operations, supply chain, affiliates and business relationships, including impacts that Novo Nordisk may cause, contribute to, or be directly linked to through its activities.

The risks described below represent those impacts that require sustained management attention, informed by the identification, assessment, mitigation, tracking and grievance processes. The value chain below illustrates where these salient risks may arise across Novo Nordisk’s activities.

- Novo Nordisk’s Salient Human Rights Risks**
1. Patients’ right to health related to access and affordability
  2. Patient safety related to product quality, supply integrity and illicit trade
  3. Human rights in research and development activities
  4. Right to privacy and data protection
  5. Safe and fair working conditions for external workers at construction sites
  6. Employees’ rights in own operations
  7. Human rights in the supply chain
  8. Harm to community rights related to manufacturing operations



## Salient human rights risks

## Mitigation actions

<p><b>1. Patients' right to health: Access and affordability</b></p>	<p>As a global healthcare company, Novo Nordisk has significant actual and potential human rights impacts related to the right to health, including related rights such as non-discrimination. These impacts may affect millions of patients across different geographies, healthcare systems and socioeconomic contexts. As of 2025, Novo Nordisk's diabetes and obesity care products are used by more than 45.6 million people globally, underscoring both the scale of positive impact and the severity of potential adverse impacts if access is constrained.</p> <p>Risks to patients' right to health may arise where barriers to access or affordability, supply disruptions, or broader healthcare system constraints limit patients' ability to obtain continuous, appropriate treatment. Such risks may disproportionately affect vulnerable or underserved populations, including patients in low- and middle-income countries or those facing structural barriers to healthcare access.</p>	<p>Novo Nordisk seeks to manage these risks through measures aimed at expanding access, supporting affordability and strengthening supply continuity, while recognising that access to healthcare is influenced by factors beyond the company's direct control. Please refer to our Access and Affordability Programme <a href="#">here</a> for further information.</p>
<p><b>2. Patient safety related to product quality, supply integrity and illicit trade</b></p>	<p>All medicines have potential side effects as well as benefits, and failures in quality or safety management may result in serious adverse impacts on patients, including impacts on the right to life and the right to health. Given the nature of Novo Nordisk's products and their use by large patient populations, any compromise to product quality, safety or appropriate use may have severe consequences for individuals.</p> <p>Risks to patient safety may arise from deficiencies in manufacturing, quality control or pharmacovigilance processes, as well as from counterfeit, diverted or illicitly compounded medicines, which pose a growing public-health risk. Patients relying on unauthorised or substandard products may be exposed to ineffective or harmful treatment without adequate safeguards.</p>	<p>Novo Nordisk seeks to manage these risks through a global Quality Management System and pharmacovigilance system, as well as through actions aimed at protecting supply integrity and combating illicit trade. For more details, please see <a href="#">here</a>.</p> <p>For every product we establish safety committees that report any adverse events on a global level to health authorities and take appropriate action when required. Please see <a href="#">here</a> for further information.</p>
<p><b>3. Human rights in Research &amp; Development activities</b></p>	<p>Novo Nordisk's research and development activities are carried out mainly in Denmark, US, UK, and China. These activities, including early-stage research and clinical trials, may involve heightened human rights risks due to their direct interaction with individuals and sensitive data. These activities may affect the rights of clinical trial participants, patients, and donors of human biosamples, including rights related to dignity, bodily integrity, health, and informed consent.</p> <p>Risks may arise where clinical research is not conducted in accordance with ethical standards, where informed consent is not fully ensured, or where vulnerable or under-represented groups are insufficiently protected. In addition, the use of AI in research activities has potential severe human rights impacts where human rights due diligence is required.</p>	<p>Novo Nordisk seeks to manage these risks through its bioethics framework, ethical oversight structures and human rights due diligence processes embedded in research activities. Our <a href="#">bioethics</a> policy sets our general guidelines. Bioethics Expert Groups keep track of emerging issues, re-evaluate risks and act upon findings. Our human biosamples evaluation of partners has integrated human rights due diligence. For more details, please see <a href="#">here</a>.</p> <p>Where research activities involve the direct participation of individuals in clinical trials, Novo Nordisk applies specific safeguards to address risks related to consent and participant protection. When sponsoring or supporting clinical trials, we adhere to global standards designed to ensure the rights, dignity and well-being of all participants, including requirements on free and informed consent. Please see <a href="#">here</a> for further information. In parallel, Novo Nordisk has established Data &amp; AI Ethics principles, applicable across the value chain and relevant to the use of data and AI in clinical research activities. These principles support ethical decision-making when collecting, analysing and using data, with the aim of maximising benefits while minimising potential harm to individuals and society. For more details, please see <a href="#">here</a>.</p>

## Salient human rights risks

## Mitigation actions

<p><b>4. Right to privacy and data protection</b></p>	<p>As a global healthcare company, Novo Nordisk processes and stores large volumes of personal and sensitive data, including data relating to clinical trial participants, patients, healthcare professionals, bio-sample donors and employees. Inappropriate handling, misuse or unauthorised access to such data may result in serious and potentially irreversible impacts on individuals, including harm to privacy, dignity and autonomy.</p> <p>Risks to the right to privacy and data protection may arise from cybersecurity incidents, data transfers across jurisdictions with differing legal safeguards, or from the development and use of advanced digital and AI-based systems. Individuals whose data is compromised may face discrimination, loss of trust or other adverse consequences.</p>	<p>Novo Nordisk seeks to manage these risks through global data protection and data ethics frameworks, supported by governance, training and oversight mechanisms.</p> <p>Novo Nordisk's <a href="#">OneCode</a> and Ethics &amp; Compliance program form the foundation of our global Privacy &amp; Data Ethics compliance, establishing minimum global standards for personal data handling and protection. In cases where national laws provide different or lower levels of protection than internationally recognised human rights principles, we apply our global standards and ethics frameworks to guide responsible decision-making regarding personal data. Additionally, we aim to upskill our employees to make ethical decisions concerning AI. For more details, please see <a href="#">here</a>.</p>
<p><b>5. Safe and healthy working conditions for external workers at construction sites</b></p>	<p>Novo Nordisk's large-scale manufacturing expansions depend on extensive use of contractors and subcontractors. Based on our risk management process, we have identified areas where further actions need to be taken regarding the human rights of external workers. These risks primarily relate to negatively impacting the labour rights of external workers, e.g. through social dumping practices, and may disproportionately affect migrant workers and other vulnerable groups. These risks are complex in nature, involves subcontracting chains and requires ongoing efforts.</p>	<p>Novo Nordisk seeks to manage these risks proactively by conducting internal workforce condition audit via first-tier contractor clauses covering labour standards, workforce agreements, and risk-based workforce audits. These interviews provide essential, first-hand insight into working conditions and are designed to ensure workers' rights without fear of retaliation.</p> <p>Where interviews or other audit findings identify conditions that do not meet contractual requirements or applicable collective bargaining agreements, Novo Nordisk requires first-tier contractors to remediate the issues, regardless of which subcontracting tier the finding originates from.</p> <p>In 2025, Novo Nordisk completed six internal construction-site audits, with further audits planned for 2026, reflecting the scale and risk profile of ongoing expansion activities. Simultaneously, we will implement site-specific awareness campaigns across all construction sites to promote our Speak Up culture. This dialogue supports early identification of risks and collaborative development of solutions to address emerging issues.</p>
<p><b>6. Employees' rights in own operations</b></p>	<p>Novo Nordisk employs a large and diverse workforce across multiple countries and functions. As an employer, Novo Nordisk has actual and potential impacts on a range of labour and human rights, including the rights to non-discrimination, equal treatment, freedom of association, safe working conditions, access to grievance mechanisms and protection against retaliation.</p> <p>Risks to employees' rights may arise in connection with organisational change, high-pressure working environments, inadequate safeguards against discrimination or harassment, or barriers to effective voice and remedy. If not properly managed, such risks may result in harm to employees' dignity, wellbeing and ability to exercise their rights.</p>	<p>Novo Nordisk seeks to manage risks to employees' rights through globally applicable labour standards, supported by governance, monitoring and access to remedy. Our <a href="#">Labour Code of Conduct</a> establishes minimum global requirements for respecting rights at work across our own operations, including non-discrimination, equal treatment, freedom of association, safe working conditions, access to grievance mechanisms and protection against retaliation.</p> <p>To support fair pay and decent living standards, Novo Nordisk applies a living-wage approach across its workforce. Living-wage benchmarks are informed by country-specific data from WageIndicator for a typical family and are uplifted by a defined margin to ensure remuneration exceeds minimum thresholds considered necessary to uphold a decent standard of living. Where statutory minimum wages exceed the calculated living-wage benchmark, the statutory level applies. Local adjustments may be made to reflect specific labour-market conditions, based on dialogue between local People &amp; Organisation functions and relevant internal partners.</p> <p>Risks to employees' rights are further addressed through internal policies, employee representation and collective dialogue structures, and accessible grievance mechanisms, including the Novo Nordisk Compliance Hotline, which supports effective voice and remedy. Further information on these measures is provided in the <a href="#">2025 Annual Report</a> in the Sustainability Statement section on Own workforce.</p>

## Salient human rights risks

## Mitigation actions

Salient human rights risks		Mitigation actions
<p><b>7. Human rights in the supply chain</b></p>	<p>Novo Nordisk relies on a global value chain spanning more than 150 countries and more than 54,000 suppliers. Value chain workers include formal and informal workers contributing to the supply of materials and services for Novo Nordisk operations. Human rights risks arise where suppliers do not meet our expectations on labour rights, health and safety and responsible business conduct.</p> <p>Higher-risk areas have been identified among suppliers of device components, medical consumables, primary packaging, construction, warehousing and logistics in specific geographies. Past impacts have included health and safety incidents and gaps in suppliers' due diligence and management systems. These risks may affect workers' rights, working conditions and other work-related rights across the value chain.</p>	<p>Novo Nordisk seeks to prevent and address human rights risks in the supply chain through our Responsible Sourcing Programme, which sets minimum requirements for suppliers on human rights, labour rights, health and safety, environmental protection and responsible business conduct. We conduct risk-based human rights and environmental due diligence to prevent, identify and address potential impacts. This includes supplier screenings, contractual requirements, responsible sourcing audits, on-site visits and worker interviews. Where concrete risks of adverse human rights impacts have been identified in our supply chain, we have engaged with our suppliers to address and mitigate these risks.</p> <p>Through our due diligence process, we identified in 2025 potential risks of severe adverse human rights impacts where mitigation is required and led to two concrete mitigation actions. Firstly, within our manufacturing supply chain, we engaged directly with a first-tier supplier to establish a shared understanding of the severity of the identified risk and to secure their continued commitment to remediation. This dialogue resulted in targeted mitigation measures, including transitioning to an alternative sub-tier supply chain with lower human rights risks. Secondly, in one of our service provider categories, we brought together a group of suppliers for a structured dialogue on potential risk areas and effective mitigation strategies. This collaborative approach helped ensure alignment and strengthened our shared commitment to responsible sourcing practices.</p>
<p><b>8. Harm to communities from manufacturing operations</b></p>	<p>Novo Nordisk's global presence and manufacturing site expansions can have both positive and negative impacts on local communities due to the nature of such projects. While we create jobs and improve infrastructure, we also risk causing noise pollution, land disputes, and other disturbances. We acknowledge these potential impacts and strive to balance our growth with responsible practices.</p>	<p>Novo Nordisk considers potential impacts on local communities when preparing new manufacturing operations and expansion projects. Before construction begins, we carry out assessments to understand community-level risks such as land use changes, environmental effects, and local infrastructure pressures. These early assessments help us anticipate potential impacts and integrate appropriate mitigation measures into project design. Novo Nordisk follows applicable laws and procedures related to land acquisition, permitting and site development.</p> <p>Novo Nordisk recognises that effective management of community level impacts requires early and meaningful engagement with affected stakeholders. Novo Nordisk is actively exploring ways we can strengthen our approach to community engagement specifically related to land use impacts. This includes seeking input from relevant stakeholders and reviewing site selection and expansion criteria further ensuring that we consider local context and potential community concerns.</p> <p>In parallel, at locations with active construction or manufacturing sites, Novo Nordisk undertakes locally anchored initiatives aimed at supporting community wellbeing. These initiatives are designed to complement, but not replace, due diligence and impact management efforts.</p>

# Implementation

## Embedding Respect for Human Rights

### Governance

Our Human Rights Commitment and its implementation is overseen by the Business Ethics Committee. The Committee comprises senior executives, such as the CEO, Chief Compliance Officer and General Counsel, and includes representation from across Novo Nordisk's internal business value chain. Implementation of our Human Rights Commitment is integrated into global Ethics & Compliance in all its key elements (i.e. governance, training, risk management, monitoring, tracking and effectiveness reviews).

The Audit Committee assists the Board of Directors with several oversight responsibilities, including Ethics & Compliance and the process for handling complaints including human rights complaints reported through the [Compliance Hotline](#). Day to day human rights management across relevant departments is assigned to the Ethics & Compliance Office, which reports to the Chief Compliance Officer. The Ethics & Compliance Office is led by a Vice President and is resourced with expertise on business and human rights.

### Training and awareness building

Executive management including our CEO regularly communicates to employees and managers the importance of respect for human rights as part of Ethics & Compliance, company values, and the Novo Nordisk Way.

In operations implementation and management of human rights issues is assigned to the global Ethics & Compliance organisation.

### Other human rights awareness and training activities

- Human Rights Day awareness campaign
- Human Rights workshops for local management teams
- Human Rights workshops for employees
- Human Rights e-learning
- Ethics and Compliance Academy (incl. dedicated human rights training)
- Ethics and Compliance webinars
- Ethics and Compliance newsletters

### Annual ethics & compliance training

Respect for human rights is part of the annual ethics training, and it is mandatory for all employees. In 2025, 99% of employees completed and documented their training, with the remaining 1% missing mainly due to employees being on leave.

### Integration of human rights considerations into corporate policies

Human rights considerations are integrated into relevant corporate policies, standards and processes across Novo Nordisk. As part of this work, corporate policies and procedures are periodically reviewed to ensure they reflect our human rights expectations and support the prevention and mitigation of adverse impacts across our operations and value chain.

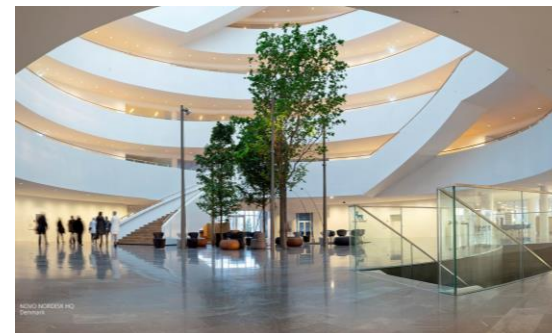
Our Human Rights Commitment includes a clear due diligence policy for our operations and affiliates. This policy also mandates that our first-tier business relationships uphold human rights in accordance with the UNGPs.

To continuously develop human rights awareness, the Ethics & Compliance Office, supported by ethics and compliance managers, delivers and coordinates regular human rights training through mandatory annual training, e-learning, as well as targeted workshops for employees and managers within the global Ethics & Compliance organisation.

Our Responsible Sourcing e-learning promotes awareness not only about human rights risks in supply chain but also about Novo Nordisk's responsibility to avoid causing or contributing to adverse impacts in our supply chain.

### ESG reporting

We published our second CSRD-compliant Sustainability Statement as part of the 2025 Annual Report, subject to limited external assurance. The statement includes EU Taxonomy disclosures, including alignment with the Taxonomy's minimum safeguards. The EU Taxonomy minimum safeguards are grounded in internationally recognised human rights and labour standards, reinforcing the due diligence approach described in this report.<sup>1</sup>



(Ethics & Compliance risk reporting structure)

<sup>1</sup> For the full 2025 Sustainability Statement please see [here](#).

# Human Rights Due Diligence

Over the past years, Novo Nordisk has continuously strengthened its human rights due diligence framework by embedding it into the global Ethics & Compliance programme and the company's enterprise risk management processes. Human rights due diligence is implemented as an ongoing and systematic part of how Novo Nordisk identifies, manages and escalates ethics & compliance risks across the organisation, with a focus on impacts on people.

## Scope and approach

Novo Nordisk's human rights due diligence covers impacts across the company's global value chain, including own operations, affiliates and business relationships. The process addresses impacts that the company may cause, contribute to, or be directly linked to through its activities. Due diligence takes into account changes in business activities, operating contexts and relationships, as well as the presence of vulnerable or at-risk groups.

## Integrations into ethics & compliance risk management

Novo Nordisk's human rights risk management, integrated into the global Enterprise Risk Management framework since 2020, constitutes the operational backbone of the company's human rights due diligence. Human rights risks are managed alongside other ethics & compliance risks, enabling a consistent and structured approach across headquarters functions and affiliates.

Twice a year, all Novo Nordisk affiliates and headquarters functions are required to report their ethics & compliance risks including human rights risks to the Ethics & Compliance Office. A global business architecture platform for risk management documents information on each risk, including affected people, severity of impact and likelihood, mitigating actions, and the effectiveness of those actions. The platform also enables internal review and tracking of risks over time. Throughout the process, ethics and compliance and human rights experts within the Ethics & Compliance Office support the organisation through training, guidance, and ongoing dialogue to strengthen awareness and capabilities related to human rights risks. Every 2-3 years we conduct a human rights risk assessment of the value chain, which takes a broader view of risks across research, production, procurement, distribution and other business relationships. This assessment helps identify emerging risks and informs prioritisation of salient human rights issues.



## Risk reviews and reporting

Reported ethics & compliance risks, including human rights risks, are subject to structured review and escalation through Novo Nordisk's established governance. Top ethics & compliance risks are elevated for a review by the Global Compliance Forum (GCF) with representation from the Ethics & Compliance Office, regional and local ethics and compliance representatives.

Based on this review the GCF makes a recommendation on effective risk mitigations to the Business Ethics Committee, which then discusses how to anchor these recommendations in the Ethics & Compliance Strategy and Programme.

Consolidated findings of Ethics & Compliance reviews and the top 10 risks, prioritised by severity and likelihood, are reported to the Executive Management and the Audit Committee annually.

## Identification of actual and potential human rights risks

Novo Nordisk identifies actual and potential human rights impacts on an ongoing basis as part of its human rights due diligence process. Actual human rights impacts are adverse impacts that have occurred or are occurring as a result of Novo Nordisk's activities or business relationships. Potential human rights impacts are adverse impacts that could occur in the future. These are identified based on the nature of the company's activities, operating contexts and business relationships, even where no harm has yet materialised.

Responsibility for identifying relevant human rights impacts lies with business unit risk owners. This work is carried out with support from ethics and compliance and human rights experts. Identification is informed by a range of internal and external sources. Internal sources include ethics & compliance risk reporting, analyses of cases reported through grievance mechanisms, audit findings, and dialogue with relevant stakeholders across functions, geographies and business areas. External inputs include country- and sector-level risk indicators, labour rights indices, media monitoring, and regulatory or peer-company developments.

The identification process covers impacts that Novo Nordisk may cause, contribute to, or be directly linked to through its own operations, affiliates and business relationships. This includes activities across the value chain, such as research, production, sourcing of raw materials, manufacturing, transportation, construction, warehousing and distribution.

Identification also takes into account changes in business activities, operating contexts and relationships. Particular attention is paid to the presence of vulnerable or at-risk groups. New situations, new business relationships or emerging human rights challenges trigger the identification of new or evolving impacts.

For example, increased use of external innovation through acquisitions of biotech companies expands Novo Nordisk's use of human data and biosamples. This increases the risk of adverse impacts on the rights of human biosample donors, including the right to free and informed consent. In response, Novo Nordisk strengthens due diligence of human biosample organisations through enhanced review and approval processes and, where relevant, onsite visits to clinics in higher-risk countries. Please read more about our approach to working with human biosamples and health data [here](#).

### Assessment of human rights risks

Identified actual and potential human rights impacts are assessed using a rights-based, inside-out approach, focusing on the likelihood and severity of impacts on people rather than risks to the business.

Assessments consider both the severity of the impact on people if it occurs and the likelihood of the impact occurring. Severity is evaluated with reference to the scale, scope and irremediability of the potential or actual harm, taking into account the presence of vulnerable or at-risk groups.

Human rights risk assessment scales	
Critical	Irremediable significant harms to people
Major	Hard to remediate or systemic harms to people
Moderate	Moderately remediable or medium-scale harms to people
Minor	Easy to remediate or small-scale harms to people

Human rights impact assessments are updated twice a year through Novo Nordisk’s ethics & compliance risk reporting cycle, ensuring continuous monitoring of human rights risks across affiliates and headquarters functions. In addition, a comprehensive human rights risk assessment of the value chain is conducted every 2–3 years, providing a broader view of emerging risks across research, production, procurement, distribution and key business relationships.

Both assessment cycles contribute to the identification and prioritisation of salient human rights risks and inform mitigation planning, escalation, and management attention.

### Human rights risks reported and managed

Human rights risks identified through Novo Nordisk’s due diligence processes, including the ethics & compliance risk reporting cycle and broader value-chain assessments, are managed within the company’s wider ethics & compliance risk framework.

For each salient human rights impact, mitigation actions are defined with clear ownership. These actions are integrated into ongoing operational and risk-management processes and may include short-, medium- and long-term measures depending on the nature and severity of the impact.

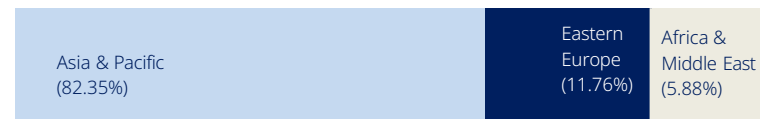
### Insights

Based on the ethics & compliance risk reporting process, among the human rights risks currently managed, 73.7% are anchored in Operations globally, with the Asia and Pacific region having the largest number, followed by Africa & the Middle East and Eastern Europe.

#### Distribution of reported human rights risks by Operations vs HQ (number of risks)



#### Distribution of reported human rights risks within Operations (number of risks)



## Mitigating actions

Novo Nordisk seeks to prevent and mitigate adverse human rights impacts based on the severity of impacts on people and how the company is involved, including whether impacts are caused by its own operations, contributed to, or directly linked through business relationships.

Where Novo Nordisk has direct control over activities, actions focus on preventing impacts from occurring by strengthening governance, policies, procedures and operational practices. Where impacts are directly linked to business relationships, actions focus on using and strengthening leverage to influence responsible conduct and address adverse impacts.

Some human rights risks are systemic in nature, particularly in certain sectors or operating contexts, and cannot be fully eliminated by a single company. In such cases, Novo Nordisk focuses on ongoing mitigation, continuous improvement and collaboration, recognising that addressing systemic risks often requires sustained engagement over time.

Mitigation actions are implemented by business unit risk owners, supported by ethics & compliance risk and human rights experts, and may include:

- strengthening governance, coordination and accountability
- reinforcing standards, requirements and contractual clauses, including cascading expectations through business relationships
- conducting training, awareness-raising and capacity-building activities
- engaging business partners, contractors, unions, industry initiatives and other stakeholders
- conducting audits, assessments and investigations
- developing and implementing corrective action plans
- providing remediation where Novo Nordisk has caused or contributed to adverse impacts, or using leverage to enable remediation where impacts are directly linked to business relationships

For example, to address risks of harassment impacting employees' rights, a written framework and guidelines were developed, and training and awareness activities were conducted in a number of business units. Other examples include engagement and training of distributors and service providers to address human rights risks of external workers and other individuals. Novo Nordisk also invests in the wellbeing of local communities around our manufacturing and expansion sites through sponsorships, donations, and non-commercial partnerships that support locally anchored initiatives.

## Tracking

Mitigation actions and milestones are monitored and tracked by business unit risk owners, ethics and compliance managers in regions and ethics & compliance risk and human rights experts.

Effectiveness of actions in reducing the severity of the impact and likelihood is assessed and tracked, which includes assessing the relevant mitigating actions as to whether they have been effective and how they have been effective, to share learnings across the organisation. Risk owners are obliged to reflect upon and document any changes to the risks on a twice-a-year basis, thereby ensuring that any changes in the nature of each salient human rights issue is captured. Once the risk, both in terms of severity and likelihood, is reduced to an acceptable level, the risk is closed.

### Engagement and Collaboration

We engage with peers and experts to seek continuous improvements in our human rights implementation approach. We also engage in collective actions to increase leverage towards addressing human rights impacts. We have regular engagement with the following collaborative efforts:

- [The Global Business Initiative on Human Rights \(GBI\)](#)
- [The Nordic Business Network for Human Rights \(NBNHR\)](#)
- [The UN Global Compact](#)
- [The Pharmaceutical Supply Chain Initiative \(PSCI\)](#)

We learn from stakeholders as we make progress. At Novo Nordisk we are committed to continuously improving our implementation of respect for human rights.

# Novo Nordisk Value Chain

## Responsible Sourcing (RS) programme: policies and processes

The Responsible Sourcing (RS) programme operationalises Novo Nordisk's human rights due diligence in the value chain by translating our Human Rights Commitment into supplier-facing policies, standards and processes aligned with Novo Nordisk's due diligence approach grounded in the OECD Due Diligence Guidance for Responsible Business Conduct. Through this programme, Novo Nordisk aims to address human rights and environmental risks in its supply chain. We also publish reports to ensure transparency on matters such as modern slavery and conflict minerals, [here](#).

To ensure supplier commitment, the [Responsible Sourcing Standards \(RSS\)](#) was developed to provide comprehensive guidance of our requirements for responsible business conduct, consistent with applicable laws and internationally recognised standards. It details our global compliance principles and expectations on our suppliers' business conduct. Our RSS is aimed at (i) protection of the environment and climate, (ii) protection of human, employment and social rights, (iii) combating bribery and corruption in all its forms, and (iv) supporting good governance of responsible business conduct, across differences in cultures, legal requirements and ethical norms among countries where we produce, source, or otherwise procure goods or require services.

The RS programme is fully integrated into our Global Procurement processes, where the RSS is part of all contract templates and embedded as a criteria into our tender processes. Capability building is embedded through recurring training and onboarding for category managers and sourcing professionals, supported by clear competency expectations for different employee profiles and levels. Training formats and frequency vary across procurement functions to reflect their specific needs.

Furthermore, RS programme operates as a global framework, where we have dedicated RS subject matter experts located in central procurement functions in HQ supported by RS representatives in local procurement units in selected countries (China, Russia, and Brazil), along with dedicated internal RS auditors.

Our due diligence process is based on a risk-based screening of country, industry and spend to identify suppliers requiring closer follow-up. Depending on the outcome, suppliers may be engaged and, where necessary, undergo RS audits that can result in corrective and preventive action plans. Where suppliers are unwilling to implement corrective actions despite sustained engagement, Novo Nordisk may ultimately end the business relationship. For relevant suppliers, REACH requirements are embedded in contractual clauses, and compliance is monitored through targeted follow-up on materials or substances prohibited in the EU.

## Actions in 2025

In 2025, we continued the phased integration of the RSS into new and renegotiated supplier contracts. To support implementation, responsible sourcing expectations were reinforced through recurring procurement trainings and further reflected in selected procurement category strategies.

In 2025, we conducted 19 responsible sourcing audits, and when non-compliances were identified, we issued corrective and preventive action plans and monitored their timely resolution and remediation.

In addition, we have been working on strengthening our human rights and environmental supply chain due diligence process, where we have initiated the configuration of a digital tool, which will allow automated risk screening, supporting us in identifying and prioritising suppliers for deeper assessments. We expect to start using risk scores operationally from early 2027. The aim is to further strengthen responsible sourcing across our supply chain in compliance with evolving regulation.

### Third party due diligence process

At Novo Nordisk, a risk-based ethics and compliance due diligence process is applied to Third-Party Representatives (TPRs). TPRs are defined as external parties that act on behalf of Novo Nordisk or represent the company's interests in interactions with public or private stakeholders, such as customers, distributors and certain other business partners. Due diligence of suppliers is addressed separately through the Responsible Sourcing programme.

Each TPR engagement is subject to a risk-based assessment that considers the nature, scope and context of the engagement. Enhanced due diligence measures are applied for TPRs assessed as higher risk.

All contracts with TPRs are required to include contractual clauses that set out Novo Nordisk's ethics and compliance expectations, including adherence to the UNGPs.

To support more consistent management of third-party risk, Novo Nordisk is developing structured processes and tools for ethics and compliance due diligence of TPRs. In 2025, we continued work on a new internal digital platform designed to guide employees through third-party engagements by providing relevant legislative references, risk-assessment steps and recommended contractual clauses. The platform includes a dedicated TPR due diligence assessment that supports the identification and evaluation of TPR risks and, where relevant, additional integrity checks. The platform is expected to be rolled out progressively from 2026.

As an additional safeguard, TPRs are screened against external databases to identify potential risks that may not be captured through the TPR due diligence process but could nonetheless represent ethics and compliance concerns. Novo Nordisk does not currently disclose a standalone anti-corruption due diligence programme for third parties in the supply chain. Related governance and controls are addressed through the company's broader risk-based ethics and compliance framework and will continue to be developed as these processes mature.



# Grievance Mechanism and Access to Remedy

## Grievance mechanism

Novo Nordisk provides multiple channels for raising concerns related to actual or potential adverse human rights impacts. All employees are required to report severe human rights concerns and are encouraged to raise any human rights related issues through our Global [Compliance Hotline](#), which is publicly accessible and available in more than 60 languages to employees and external stakeholders.

Novo Nordisk's Corporate Human Rights Requirements set expectations for reporting severe human rights concerns. The Compliance Hotline provides a confidential reporting channel for employees and external stakeholders to support implementation of these requirements and is reinforced by training and awareness activities. Concerns related to product safety, side effects, misuse or falsified products are handled through dedicated product-related reporting on the Novo Nordisk website here, [Report a side effect](#).

## *Suppliers*

Novo Nordisk expects suppliers to establish appropriate grievance mechanisms allowing workers to raise concerns confidentially or anonymously with their employer without fear of retaliation. Through the RSS, suppliers are contractually required to establish a grievance mechanism where workers can raise concerns anonymously and in confidentiality.

## Remedy, follow-up and learning

Novo Nordisk is committed to addressing actual adverse human rights impacts that it causes or contributes to, and to using its leverage to enable remedy where impacts are directly linked through business relationships.

All concerns raised through grievance mechanisms are assessed through a structured, confidential and fair process. Investigations are conducted on a case-by-case basis, drawing on relevant facts, context and expertise. Where concerns are substantiated, appropriate corrective actions are implemented in line with company policies and the severity of the impact.

Throughout the process, dialogue is maintained with the reporting party via secure communication channels, ensuring they are informed when the case has been reviewed and concluded.

Responsibility for implementing corrective actions and ensuring improvements lies with local management. Insights from cases may also inform broader awareness raising or enhancements to practices, even in instances where concerns are not substantiated.

Novo Nordisk continues to evaluate how our approach to remedy, follow-up and learning can be further strengthened as part of our ongoing human rights due diligence efforts.

NOVO NORDISK A/S – NOVO ALLE 1, 2880 BAGSVÆRD, DENMARK – CVR NO. 24256790,

+45 4444 8888 (SWITCHBOARD), [NOVONORDISK.COM](http://NOVONORDISK.COM)