

Our Human Rights Commitment



In Novo Nordisk, **we are committed to meet the responsibility to respect human rights throughout our operations and value chains** as defined by the [UN Guiding Principles on Business and Human Rights](#), hereinafter the UNGPs. As such we will:

- Identify potential and actual adverse** human rights impacts that our own operations may cause or contribute to;
- Prevent or mitigate potential adverse** impacts on human rights, where identified, by taking appropriate actions;
- Seek to best remediate or participate** in the remediation of any actual adverse human rights impacts that our business causes or contributes to, including collaborating with judicial or non-judicial mechanisms to provide access to remedy;
- Account for how we address our potential and actual adverse** impacts on human rights, where it will not put the people concerned at risk or compromise legitimate commercial confidentiality requirements;
- Require our first-tier business relationships** directly linked to our operations, products or services, to meet their responsibility to respect human rights as defined by the UNGPs, including committing to respect all internationally recognized human rights, carrying out human rights due diligence in their own operations, and providing access to remedy, when needed;
- Require our first-tier business relationships** to require their first-tier business relationships to meet their responsibility in alignment with the UNGPs;
- Use or build our leverage** to make business relationships directly linked to our operations, products, or services cease actions or omissions that have led to severe adverse impacts on human rights, once we become aware of such impacts, and to require such business relationship to conduct ongoing human rights due diligence.
- Require all our own employees** to assist us in respecting human rights in their daily decisions and actions, by adhering to the Novo Nordisk OneCode and internal corporate human rights requirements based on this commitment.

Our human rights commitment references all internationally recognised human rights. This includes, at minimum, all human rights stated in the [International Bill of Human Rights](#) (IBHR), which includes the International Labour Organization (ILO) [Declaration on Fundamental Principles and Rights at Work](#). Our commitment thereby includes the prohibition of any form of forced labour or the trafficking of persons across own operations and in our value chains.

The commitment covers the human rights of **any persons who may be adversely impacted by Novo Nordisk's activities and business relationships**, hereunder patients, employees, people who work in our value chains, community members and other individuals. In our due diligence processes, we pay particular attention to the rights of, and the challenges faced by, vulnerable groups whom we may impact, such as children and patients. When addressing such risks we apply additional relevant United Nations instruments, such as the [Convention on the Rights of the Child](#).

Our human rights commitment **is rooted in our Articles of Association**. It is embedded in our operations through policies, procedures, and guidelines, all as part of Novo Nordisk 'human rights by design'.

The Business Ethics Committee, comprising the Chief Executive Officer, Chief Compliance Officer and Chief Legal Officer, among others, is responsible for overseeing this commitment and its implementation. The Chief Compliance Officer is accountable for the implementation and decision-making on human rights issues, which are integrated into our global Ethics & Compliance program. The Audit Committee (including representatives from the Board of Directors) assists the Board of Directors with several oversight responsibilities, hereunder Ethics & Compliance and the process for handling complaints, which includes human rights grievances received through the [Compliance Hotline](#). We have established several additional channels, including an Ombudsman, to report grievances. The responsibility for day-to-day human rights management across relevant departments is assigned to the Business Ethics Compliance Office, which reports to the Chief Compliance Officer.

This commitment is approved by Lars Fruergaard Jørgensen, President & CEO of Novo Nordisk, and Helge Lund, Chair of the Board of Directors (27 November 2024)

ILO Fundamental principles and rights at work

- a)** freedom of association and the effective recognition of the right to collective bargaining
- b)** the elimination of all forms of forced or compulsory labour
- c)** the effective abolition of child labour
- d)** the elimination of discrimination in respect of employment and occupation
- e)** the right to a safe and healthy working environment