

Our Human Rights Commitment



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

- **Identify** potential and actual adverse human rights impacts that our operations may cause, contribute to or be directly linked to;
- **Prevent or mitigate** potential adverse impacts on human rights, where identified, by using or establishing processes;
- **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 impacts on human rights, where it will not put the people concerned at risk or damage legitimate requirements of commercial confidentiality;
- **Require all our employees** to reflect respect for human rights in their daily decisions and actions and act in accordance with respect for human rights, by adhering to the Novo Nordisk Code of Conduct and corporate human rights requirements;
- **Expect our business partners and other parties** directly linked to our operations, products or services, including suppliers, to meet their responsibility to respect human rights as described by the UN Guiding Principles on Business and Human Rights, including committing to respect all human rights, carrying out human rights due diligence and providing access to remedy when needed; and
- **Use leverage** to make other parties directly linked to our operations, products or services cease actions or omissions that lead to adverse impacts on human rights once we become aware of such impact.

Our human rights commitment refers to all internationally recognised human rights. This includes all human rights at a minimum as stated in the [International Bill of Human Rights](#) and the [International Labour Organization \(ILO\) Declaration on Fundamental Principles and Rights at Work](#). We strictly prohibit the use of any form of forced labour or the trafficking in persons across all our operations and in our value chain.

Our human rights commitment refers to the human rights of any persons who can be adversely impacted by Novo Nordisk's activities and business relationships, including patients, employees, people who work in our value chains, community members and other individuals. We will pay particular attention to the rights of, as well as the challenges faced by, vulnerable groups whom we have impacts, such as children and patients, by referring to relevant United Nations instruments, including the [Convention on the Rights of the Child](#).

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

Our human rights commitment and implementation are overseen by the Business Ethics Committee, comprising the Chief Executive Officer, Chief Compliance Officer and Chief Legal Officer among others. The Chief Compliance Officer is accountable for implementation of our human rights commitment and decision-making on human rights issues, which are integrated into our global Ethics & Compliance. The Audit Committee (including representation from the Board of Directors) 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](#) (whistleblowing). Consolidated findings of Business Ethics reviews and top 10 risks are reported to the Executive Management and the Audit Committee annually. 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 statement is approved by Lars Fruergaard Jørgensen, President & CEO of Novo Nordisk (21 June 2022)