



## **Novo Nordisk**

### **Modern Slavery Statement 2025**

This is the ninth public Modern Slavery statement by Novo Nordisk. It has been developed in accordance with the UK Modern Slavery Act 2015 and the Australia Commonwealth Modern Slavery Act 2018, and local filings have been made accordingly in each country. This general statement sets out the steps taken by Novo Nordisk A/S, its subsidiaries Novo Nordisk Ltd (UK) and Novo Nordisk Pharmaceuticals Pty. Ltd. (Australia) in this regard during the financial year ending 31 December 2025.

At Novo Nordisk, we recognise that modern slavery including human trafficking, forced labour, bonded labour, child slavery and hazardous child labour can occur in every industry and sector. We take the steps outlined here to understand what these risks are and to manage them accordingly.

#### **About Novo Nordisk**

With headquarters in Denmark, [Novo Nordisk](#) is a global healthcare company with over 100 years of innovation and leadership in diabetes care. This heritage has given us the experience and capabilities that also enable us to help people defeat other serious chronic diseases: obesity, haemophilia and growth disorders as well as expanding our research and development efforts into other areas such as cardiovascular, liver and kidney diseases related to diabetes and obesity. We employ more than 69,000 people in 80 countries.

#### **Novo Nordisk's main operations**

Novo Nordisk's main product areas are diabetes care, obesity care, rare disease, and other serious chronic diseases. Novo Nordisk supplies nearly half the world's insulin, and in 2025 we reached 45.6 million people living with diabetes and obesity worldwide, with more than 8.8 million people living with diabetes reached through our access and affordability programmes. We have research and development centres in Denmark, UK, US, mainland China and India. We have production sites in Denmark, Belgium, Italy, Ireland, Czech Republic, France, US, Brazil, mainland China, Russia, Algeria, Iran and Japan.

#### **Novo Nordisk's supply chain**

Through our own organisation and supply chain we source raw materials, components, and services to produce Novo Nordisk products in diabetes care and other serious chronic diseases. Novo Nordisk's products are manufactured and assembled in more than 30 countries, with some 430 first-tier direct suppliers. Novo Nordisk's global supply chain also includes more than 54,000 first tier indirect suppliers that provide goods & services to support our business activities.

## **Governance**

Novo Nordisk's human rights compliance including human rights due diligence and human rights risk management is overseen by the Business Ethics Committee, which comprises the Chief Executive Officer, Chief Compliance Officer, and General Counsel among other members. Consolidated findings of Business Ethics reviews and risks are reported to our Executive Management and the Audit Committee, which comprises members of [the Board of Directors](#). The responsibility to drive implementation of respect for human rights in daily operations sits in the Business Ethics Compliance Office reporting to the Chief Compliance Officer.

## **Novo Nordisk Way**

At Novo Nordisk, we are committed to being a sustainable business. To achieve this ambition, we strive to do business in a financially, environmentally, and socially responsible way, as reflected in our Articles of Association and the Novo Nordisk Way which provide general guidance to all employees on how we conduct responsible business.

## **Human Rights policy commitment**

[Novo Nordisk's commitment to respecting human rights](#) as per [the UN Guiding Principles on Business and Human Rights](#) and [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#) is anchored in Novo Nordisk's [OneCode](#), outlining the principles for working at Novo Nordisk. Our commitment refers to all human rights expressed in the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. We explicitly commit to prohibition, prevention, and mitigation of forced, bonded or debt labour, slavery, servitude, and human trafficking and providing access to remedy. In addition, we also refer to the UN Convention on the Rights of the Child to respect children's rights.

Novo Nordisk's corporate requirements on human rights require all Novo Nordisk employees to act in accordance with respect for human rights in their daily decisions. In short, all Novo Nordisk employees must:

- 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 and OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, 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.

Novo Nordisk [Labour Code of Conduct](#) provides a set of minimum labour standards for all employees including the following: All employees work for the company on a voluntary basis under no threat of penalty or sanctions. Child labour is not accepted, and in accordance with Novo Nordisk's Labour Code of Conduct, the company does not employ persons below the age of 15 years. People under the age of 18 are protected from hazardous work and night shifts. All employees in Novo Nordisk earn sufficient income of minimum 20% above living wage in a standard working week to meet their basic needs (and those of their families).

Novo Nordisk has further strengthened its Labour Code of Conduct by introducing a global minimum standard of 14 weeks of gender-neutral parental leave, applicable to both birthing and non-birthing parents. In addition, Novo Nordisk offers a minimum of two weeks of paid caregiver leave annually to employees who need time off to manage caregiving responsibilities for dependents with a critical health condition. Employees can apply for leave in accordance with local guidelines. In addition, to continue being a sustainable employer, Novo Nordisk is committed to fostering an inclusive culture that drives innovation.

Novo Nordisk also has a [Responsible Sourcing Standard](#) outlining Novo Nordisk requirements to our suppliers on responsible business conduct based on the foundation of laws and internationally recognised standards, such as UN Guiding Principles on Business and Human Rights and Corporate Sustainability Due Diligence Directive (CSDDD). It details our global compliance principles and expectations of how our suppliers conduct business across cultural and legal differences among countries where we produce, source, receive goods or require services. We expect our suppliers to adhere to equal or more restrictive requirements, which include preventing modern slavery.

### **Responsible Sourcing Programme**

The Responsible Sourcing Programme was developed initially in 2002 and has since then been updated regularly to provide a comprehensive guidance of our requirements for responsible business conduct towards suppliers, consistent with applicable laws and internationally recognised standards. All suppliers engaged with Novo Nordisk are expected to act with integrity and adhere to the Responsible Sourcing Standards. The Responsible Sourcing Programme is integrated into our sourcing and procurement processes. Global Procurement is responsible for coordinating and driving the Responsible Sourcing Programme into daily operations and is supported by relevant business units, Responsible Sourcing audits and local Responsible Sourcing experts located in our procurement units in China, Brazil and Russia.

To identify and prioritise action within our supply chain, we employ a Responsible Sourcing risk matrix that identifies high risk areas for responsible business conduct based on the inherent risk profile of both country and industry. Based on our supply chain risk assessment, audit findings, engagement with suppliers and input from experts and peers, we have defined the following risk areas in our supply chain: 1. Health and safety incidents; and 2. suppliers' deficiencies of supplier due diligence and management systems.

As part of our Responsible Sourcing Programme, high risk suppliers are prioritised for Responsible Sourcing audits. A pre-audit survey on use of vulnerable workers can lead to an extended audit if human rights risk indicators are found. Guidance material for auditors includes elaboration of modern slavery risk indicators.

In 2025, 19 Responsible Sourcing audits took place with a considerable share performed in China. From these audits, findings in the main risk areas related to safety regulations and working hours specifically. For all findings, action plans are in place, and we are following up to ensure implementation and resolution of the issues.

## **Due Diligence in relation to Modern Slavery**

### **Risk identification by sector, country, and material**

To identify sectors and categories with high modern slavery risks, we have used the following indicators that are generally known to increase risk likelihood:

- Reliance on low-skill workforce
- Reliance on migrant workforce
- Presence of labour intermediaries
- Presence of children
- Hazardous or undesirable work
- Non-transparent supply chain

Broader operational contexts in each manufacturing country, including factors such as conflict, corruption, weak governance, and enforcement of international human rights standards have also been part of our risk assessments.

These assessments have led us to identify the following as high-risk areas in the global supply chains of Novo Nordisk's products:

- Device components in mainland China, Taiwan, and Thailand
- Medical consumables in Malaysia
- Primary packaging and printed pack materials in mainland China, Brazil, and Mexico
- Construction, warehousing, logistics and other non-core activities for all manufacturing sites

We recognise that certain raw materials and commodities are known for potential modern slavery risks. We participate in collaborative efforts to understand human rights risks in raw materials in the pharmaceutical sector through [Pharmaceutical Supply Chain Initiative's](#) Human Rights sub-committee.

In addition to above areas, we have identified risks in human biosamples used for biomedicine research. Human biosamples are human biological materials including but not limited to tissues, blood, and primary cells, derived from living or deceased human beings. Human biosamples thus involve high risks of potentially serious exploitation for donors, especially if they are in vulnerable positions. Since 2015 Novo Nordisk's Human Biosample Governance experts have conducted 600+ evaluations of human biosamples suppliers, contract research organisations and external collaborations involving human biosamples, including 100+ onsite evaluations.

Based on the data and observations gathered by the Human Biosample Governance team from onsite evaluations, Novo Nordisk has implemented a risk-based global evaluation program, without compromising the risks associated with sourcing and using human biosamples. Our evaluation criteria include that donation of human biosamples are freely given without coercion or inducement, mitigating potential risks of trafficking involvement. Novo Nordisk does not accept use of human biosamples from vulnerable groups such as prisoners or detainees. For all new organisations, we conduct desk-based assessment of donor recruitment methods, including reviews of questionnaires, ethics committee approvals, informed consent templates and information sheets given to donors and patients, prior to their donation. For high-risk organisations, we conduct onsite visits, on top of the desk-based assessment.

Following each evaluation, Human Biosample Governance lead auditors summarise the evaluation findings in a report. Identified non-conformities must be addressed by the organisation through submission of corrective documentation, which is reviewed and approved by the Human Biosample Governance team prior to final organisational approval.

This experience has given the Human Biosamples Governance team the data and insights on different risks by country. The team continuously strengthens the evaluation programme, adhering to the *UN Guiding Principles on Business and Human Rights*, *OECD Guidelines for Multinational Enterprises on Responsible Business Conduct* and other international declarations, conventions, and guidelines, to protect donors, patients, and external stakeholders.

### **Actions to address the risks**

Novo Nordisk conducts audits of high-risk suppliers both for new supplier qualification and as part of Responsible Sourcing Programme's risk management process, with a specific focus on assessing compliance with the Responsible Sourcing Standards. Each audit results in a formal audit report, and suppliers are required to address any findings by developing

corrective and preventive action plans and providing documentation to demonstrate their effective implementation.

As part of the bi-annual global Ethics & Compliance risk management processes, all business units in the global organisations are required to identify, assess, mitigate, prevent, track, and internally report risks of adverse human rights impacts (including modern slavery risks). Several subsidiaries have as part of the E&C risk management process identified risks of potential labour abuse of external workers in business relationships and implemented mitigation and prevention measures such as contract reviews and training.

## **Training**

At Novo Nordisk we regularly conduct Ethics & Compliance training to all employees. Throughout 2025 a series of human rights training initiatives and awareness activities including human rights e-learning were delivered for continuous development of human rights capabilities. Annual training in Ethics & Compliance, which includes respect for human rights, 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.

An e-learning on Responsible Sourcing is made available to all procurement and other relevant Novo Nordisk employees. Furthermore, we provide recurring training, in-person or online, to our procurement organisation to reinforce their expertise and ensure the RSS is consistently incorporated into contracting processes.

## **Stakeholder engagement and collaborations**

We engage with peers and experts to seek continuous improvements in our approach, including:

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

## **Remediation**

Novo Nordisk employees and external stakeholders including affected people have the possibility of reporting concerns of modern slavery and other negative human rights impacts securely and confidentially via the [Compliance Hotline](#).

This global statement was approved by Mikkel Skou Larsen, Chief Compliance Officer of Novo Nordisk.

Date: 10-04-2026

See local filings of our Modern Slavery Statements in:

- UK
- Australia
- Canada
- NNRDUK

See other relevant statements:

- [Conflict Minerals Disclosure](#)
- [Statement on Due Diligence Processes Covering Child Labour Risks](#)