

Novo Nordisk

Modern Slavery Statement 2024

This is the eighth 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 2024.

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 77,000 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 2024 we reached 45.2 million people living with diabetes and obesity worldwide, with more than 8.4 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, 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 450 first-tier suppliers. Novo Nordisk's global supply chain also includes more than 60,000 first tier indirect suppliers that provide goods, services, transportation, products and services that 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 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, 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 persons

below the age of 18 are protected from any 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). As per 1 January, Novo Nordisk has further strengthened our Labour Code of Conduct by introducing a global minimum standard of 14 weeks of gender-neutral parental leave applicable both for birthing and non-birthing parents. Also, as per 1 January, we offer a minimum 2 weeks of paid caregiver leave annually, to any employee who needs time off to manage caregiving responsibility for dependents who are afflicted with a critical health condition. Employees can apply for leave according to 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. The Responsible Sourcing Standard outlines Novo Nordisk requirements for responsible business conduct consistent with applicable laws and internationally recognised standards. It details our global compliance principles and expectations of how our supplier partners conduct business across cultural and legal differences among countries where we produce, source, receive goods or require services. We expect our supplier partners to adhere to the strictest applicable requirement. In 2024, the content of the Responsible Sourcing Standard was revised and strengthened. As part of this update, we reinforced our commitment to prevent modern slavery in our supply chain.

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 supplier partners 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 at our strategic production sites.

Based on our annual supply chain risk assessment, audit findings, engagement with suppliers and input from experts and peers, we have defined the following main risk areas in our supply chain: 1. Worker safety and emergency preparedness, 2. Safe and responsible handling of waste and environmental resources and 3. Working hours, time off and leave. These main risk areas are reflected in our Responsible Sourcing risk model, which identifies

high risk suppliers based on country and the types of activities which are known to present responsible business risks.

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 2024, 23 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

Based on desk research and data from the UN, governments and reputable research organisations, internal consultations, mutual learning with peer companies ([Global Initiative on Business and Human Rights](#), [Pharmaceutical Supply Chain Initiative](#)) and expert inputs from an NGO experienced in this field, we assessed modern slavery risks in our value chains.

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 manufacturing sites in Algeria, Bangladesh, mainland China, Egypt, India, Saudi Arabia, and Iran.

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 500+ evaluations of human biosamples suppliers and external collaborations involving human biosamples, including close to 100 onsite evaluations. This experience has given us data and insights on different risks by country. We continuously strengthen our evaluation programme, adhering to the *UN Guiding Principles on Business and Human Rights*, and other international declarations, conventions, and guidelines, to protect donors, patients, and external stakeholders.

Actions to address the risks

As part of the Responsible Sourcing Programme activities, Novo Nordisk carries out pre-qualification and routine audits of high-risk suppliers, focusing specifically on Responsible Sourcing. Audits lead to a summarising audit report, and suppliers are required to respond to findings by preparing corrective action plans and submitting documentation for completion of such plans.

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.

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 2024 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 2024, 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, an introduction to Responsible Sourcing is also included as part of the global on-boarding programme for new employees to the Global Procurement organisation 4 times a year.

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 Kim Bundegaard, Chief Compliance Officer of Novo Nordisk.

Date: 11-04-2025

See local filings of our Modern Slavery Statements in:

- UK
- Australia
- Canada

See other relevant statements:

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

Sebnem Aygar Tuna
23.06.2025
