

Novo Nordisk Labour Code of Conduct

➔ Ensure Labour Rights Compliance



Objective

This Labour Code of Conduct is primarily for internal use, yet it is also made externally available to make our commitment and expectations clear to everyone. Novo Nordisk Labour Code of Conduct describes expected minimum requirements regarding Novo Nordisk employees' human rights at work, in line with Novo Nordisk's Human Rights commitment. When there is a difference between national law and this Labour Code of Conduct, we seek to apply the higher standard to the extent possible.

Applies to

This Labour Code of Conduct applies to all Novo Nordisk employees. The Global People and Organisation community shall ensure the code is implemented and followed. This Labour Code of Conduct replaces Novo Nordisk Global Labour Guidelines and the Supporting Notes.

Roles and Responsibilities

Role	Responsibilities
Employee	<ul style="list-style-type: none"> • Read this Labour Code of Conduct and apply its principles in your daily work • Involve People Compliance or Human Resources early if in doubt to solve or mitigate non-compliance issues with this Labour Code of Conduct. Speak up, and report possible or actual violations of this Code of Conduct to your manager or the Compliance Hotline • Communicate Novo Nordisk human rights, Labour Code of Conduct compliance standards and expected behaviours to colleagues
People & Organisation and Managers	<ul style="list-style-type: none"> • Ensure that employees reporting to you understand this Labour Code of Conduct and guide them on how to do their daily work in a non-discriminating way and with an equal treatment mindset • Promote a "speak up culture" where human rights and Labour Code of Conduct non-compliance dilemmas are voiced and handled. Ensure that employees are aware of the Compliance Hotline • Lead by example by role modelling human rights decision making and ensuring a respect for human rights mind-set • Demonstrate to your team that for results to matter they must be achieved the right way

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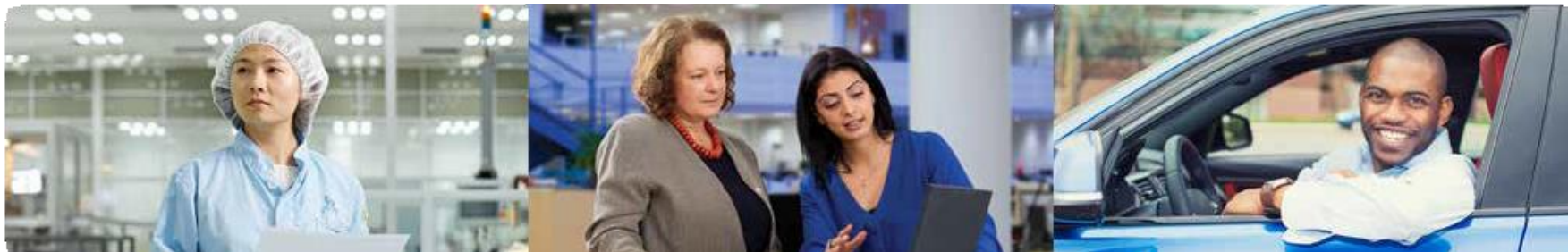


1. Our Commitment to Human Rights

Novo Nordisk is committed to meeting our responsibility to respect human rights as defined by the UN Guiding Principles on Business and Human Rights. At a minimum, this means the rights set out in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. [See Novo Nordisk Human Rights commitment here.](#) We also support the UN Global Compact principles.

We pay special attention across all the countries where we operate to employees' working conditions, their right to organize and bargain, their health and safety, respect for individuals and their privacy, and provide an environment where all employees can thrive free from discrimination and harassment. We comply with laws and regulations where Novo Nordisk does business and adopt and apply international standards where laws are less stringent.

Novo Nordisk's Human Rights Commitment is manifested in Novo Nordisk Business Ethics Code of Conduct and Business Ethics Compliance Framework. Any employee with concerns regarding the human rights impacts of our operations may raise these through our employee mechanisms for raising workplace-related grievances.



2. We speak up

Novo Nordisk encourages an open and honest culture of trust and integrity. Part of building a culture of trust is speaking up about non-compliance concerns related to this Labour Code of Conduct so we can address, mitigate and remediate potential infringements and/or issues.

If you are unsure of how our standards or values apply to a given situation, or you suspect a potential compliance deviation, you are responsible for raising it through the appropriate channels.

2.1 How to report a concern

Anyone who becomes aware of an actual or potential violation of this Code of Conduct can and should speak up. If you feel comfortable, talk to your manager about it. Such conversation may easily remedy many issues. If you are not comfortable with this, or appropriate action is not being taken to address an issue, please contact:

- Your local P&O or Human Resources
- Legal and/or Compliance function
- Business Ethics Compliance Office or Group Internal Audit
- The Compliance Hotline
- Novo Nordisk's Ombudsperson

Both employees and external partners can report concerns to our Compliance Hotline. All reports are treated confidentially, and you have the option to report anonymously. To contact our Compliance Hotline, use this [External Link](#) which is available in most languages. Novo Nordisk employees can find contact details and further support by typing 'COMPLIANCEHOTLINE' in your browser and choose location and language.

2.2 Non-retaliation

We have no tolerance for retaliation at Novo Nordisk. You will not suffer any adverse consequences for:

- Refusing to do something that violates this Labour Code of Conduct, our requirements, or the law, even if your refusal results in the loss of business to Novo Nordisk
- Raising a concern in good faith about potential misconduct
- Cooperating with an investigation

Any good faith report of wrongdoing may never result in legal or financial consequences for the employee. Anyone who retaliates against an employee for engaging in any of these activities will be subject to disciplinary action.

3. Labour Code of Conduct in General

Novo Nordisk Labour Code of Conduct describes our globally adopted minimum standard on critical working conditions of our employees and it is to be applied across our company. With this Labour Code of Conduct we strive to prevent, mitigate, remedy and account for any adverse human rights impacts with which Novo Nordisk potentially are involved in, our own business operations. We are aspired to promote a positive and inclusive work environment that respects the individual. Our responsibility to respect means we should not infringe on the right of others and remedy human rights harm where it may occur. Remember that perception matters. Your behaviour can be considered improper or a human rights infringement regardless of your intention.

This Labour Code of Conduct covers the following rights at work: Working Hours, Living Wage, Leave, Employee Privacy, Equality/ Harassment/ Discrimination, Freedom of Association and Collective Bargaining, Forced and Bonded Labour, Child Labour and Young Workers and Grievance Mechanisms.



3.1 Working Hours

We are committed to providing for permissible working hours. We will not make excessive use of pre-agreed overtime work, and pre-agreed overtime hours worked will be duly compensated.

We safeguard this by:

- In the absence of applicable laws or collective agreements, not to regularly exceed 48 hours of work per week, with additional pre-agreed overtime not exceeding 12 hours per week (i.e. strive to limit work hours to 60 hours of work per week). Where national law may exceed the 60 hours per week limit (for example, national law may not set maximum limits on weekly working hours), the 60-hour limit should apply
- Pre-agreed overtime work should be infrequent, voluntary, and in accordance with prescribed legal procedures. In arranging overtime, due consideration should be given to persons under 18 years of age, pregnant women, nursing mothers and people with disabilities
- Normal restrictions may be suspended during unforeseen circumstances, or for urgent unscheduled maintenance or repair of production equipment
- Managers should be aware of all national legal requirements and collective agreements regarding regular hours, pre-agreed overtime work, reasonable notice and rest periods applying to our employees
- We should ensure that employee performance targets are achievable within the standard working hours, so employees do not feel pressured to work overtime in order to meet them
- Accurate records of regular and pre-agreed overtime working hours are maintained, in accordance with applicable collective agreements and national law or guidelines
- Compensation for pre-agreed overtime work follows applicable collective agreements and national law or guidelines and is remunerated at no less than 125% of the regular rate of pay for those eligible for pay overtime
- Employees should have reasonable breaks during their work day for meals, breaks or other needs. At a minimum, we should ensure employees are entitled to a break after a continuous period of five hours of work and that appropriate rest facilities are provided (such as hygienic canteens and break rooms). At least one break per day shall be 30 minutes or more
- We should ensure that there is sufficient time for employees to combine paid work with family and domestic obligations, i.e. respect for worklife balance

3.2 Living Wage

We ensure that all employees earn sufficient income in a standard working week to, at a minimum, meet their basic needs (and those of their families) and to provide some discretionary income.

We safeguard this by:

- Employee salaries and benefits paid for a standard working week shall meet at least a premium above the living wage* of given country, the statutory minimum wage given by national law, prevailing industry benchmark standards or the wage negotiated in a collective agreement, whichever is higher
- Employee salaries and benefits shall be periodically assessed and adjusted to take into account changes in the cost of living and other economic conditions
- Employees shall be provided with written and understandable information about their employment conditions in respect to salaries before they enter employment, and about the particulars of their salaries for each salary payment made
- Salaries are paid to employees regularly and on time to avoid any accumulation of salary arrears
- Where salary advances are given, they should comply with national law and employees should be fully informed of labour conditions
- Deductions from salaries as a disciplinary measure shall not be permitted, nor shall any deductions from salaries not provided for by national law be permitted without the expressed permission of the employee concerned
- Ensure all employees receive equal remuneration for work of equal value, by prohibiting any discrimination in the remuneration of employees for reasons unrelated to their qualifications or job performance
- We recognize the right of everyone to social security, including social insurance



* As calculated by an independent 3rd party

3.3 Leave

We provide rest-periods, breaks and leave for all our employees. Leave includes vacation and holiday leave, sickness leave, parental leave and caregivers leave

We safeguard this by:

- Employees should be allowed at least 24 scheduled consecutive hours of rest in every 7-day period.
- Employees shall be provided with understandable information about all applicable conditions relating to leave and holidays. These conditions and any changes to these during employment should be set out in writing, either on the local website or to individual employees.
- Employees are entitled to take paid annual leave in accordance with national law. Public holidays are not counted as part of the annual leave.
- Employees are entitled to take leave for sickness, family reasons, public holidays and occupational diseases or injuries in accordance with national law. The leave should be paid cf. national rules.
- The religious traditions and customs of employees should, as far as possible, be respected.

Leave in connection with birth/adoption of a child:

- In Novo Nordisk, we aspire to build an inclusive and diverse working environment through driving gender equality and equal rights for all our employees. We safeguard this by ensuring minimum standards for parental leave in all Novo Nordisk units and geographies.

Employees who give birth (the birthing parent) are granted a minimum of 14 weeks of parental leave. The parental leave should be paid or covered for with adequate social benefits/insurances, or be a combination of the two, if possible, without causing issues due to national law.

As per 1 January 2025 non-birthing parents are granted a minimum 14 weeks of gender-neutral parental leave following the birth or adoption of a child. The non-birthing parental leave should be paid, or covered for with adequate social security benefits/ insurances, or be a combination of the two, if possible, without causing issues due to national laws. Non-birthing parents are eligible to this leave within the first year of the birth/adoption of the child.

Effective 1 January 2025, we therefore have a single global minimum standard for 14 weeks gender-neutral parental leave applicable both for birthing parents and non-birthing parents.

- The termination of employment of any employee (birthing or non-birthing parent) during absence on parental leave, except on grounds unrelated to pregnancy, the time of the childbirth/adoption and its consequences, is prohibited. The parent returning to work must at a minimum be returned to the same position or an equivalent position paid at the same rate.
- The employed birthing parent or non-birthing parent of the child should be entitled to request a further period of parental leave following the expiry of the paid parental leave. The request should be assessed in accordance with business needs.

Caregivers leave:

- As per 1 January 2025, we offer a minimum 2 weeks of paid 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.

3.4 Employee Privacy

We secure the right to privacy of our employees whenever personal employee data is gathered or the workplace is monitored. Personal employee data should be processed lawfully and fairly, and only for reasons directly relevant to their employment. It should never be used in a manner incompatible with the original purpose.

We safeguard this by:

- Using personal data as part of your work in Novo Nordisk; 1) you must use least amount of personal data needed, 2) where required by local law and regulation inform people on how we use their personal data, 3) only share personal data with those who need to know, 4) store personal data securely and 5) delete personal data when no longer needed
- Employees can request information about all workplace monitoring, together with the reasons for such monitoring and the data to be collected. Disclosure of certain data may be prohibited by national law, e.g. due to law suits or equivalent
- Security cameras or other surveillance devices and security personnel are used according to clearly stated policies and with due respect for employee privacy
- Prohibiting the collection of personal employee data on sex life, political, religious or other beliefs, except where required by national law
- Medical data of employees should be collected only if required by national law and only in cases directly related to the employee's protection while working. In such cases, all medical records are kept confidential
- Upon request, employees have the right to receive information about all personal data collected and stored about them, excluding specific confidential management information
- Prohibit the collection of personal data concerning an employee's membership in a trade union (or other form of workers' organization), or the worker's trade union activities, unless obliged or allowed to do so by law or a collective agreement
- Personal employee data is protected by such security safeguards as are reasonable in the circumstances to guard against loss and unauthorized access, use, modification or disclosure
- We follow national legal requirements and policies on the disposal of data concerning former employees and job candidates
- We assess and respond to government demands for disclosure of personal employee data with due consideration to privacy rights.
- Pregnancy testing is prohibited at the time female employees apply for employment, and throughout the duration of their employment.

Novo Nordisk employees can find further support by typing **'PERSONALDATA'** in your browser. If you want to go directly to the NNI site, type **'TheEthicsNavigator'**.

3.5 Equality, Harassment and Discrimination

We are committed to treating every employee with dignity and respect and to promoting equality of opportunities within Novo Nordisk. We believe that equal treatment provides an attractive, engaging, and effective workplace for our employees. We offer equal treatment and opportunities for all employees, and a working environment free from discrimination and harassment.

We safeguard this by:

- Equality is applied to all stages of employment including; the recruitment process, working conditions, remuneration, development, promotion, termination or retirement in accordance with local conditions or requirements by national law
- Equality means free from discrimination due to gender, family status, race/ ethnic origin, including colour, national or social origin, religious beliefs, political orientation, sexual orientation/ sexual identity, marital status, age or disability and other categories protected by national law
- Under no circumstances, do we accept the use of humiliating or corporal punishment, and no employee shall be subject to physical, sexual, pressure, psychological or verbal harassment or abuse. This applies to behaviour at work, at work assignments outside the office, at office-sponsored social functions and to private behaviour that can be related to Novo Nordisk (e.g. on the social media)
- Identify tasks which could be offered to disabled people employed in the company and ensure disabled employees benefit from specific measures aiming to adapt their working stations to guarantee their physical comfort, when requested by a disabled person employed by the company
- All employees shall receive an appropriate level of training and development to enable them to perform their duties
- Prohibit disciplinary or discriminatory actions from the employer for an employees' choice to peacefully and lawfully organise or join an association



3.6 Freedom of Association and Collective Bargaining

We respect our employees' right to associate freely, to join or refrain from joining labour unions and workers' councils without fear of discrimination or retaliation. We believe that open and ongoing communication contributes and develops a lasting relationship with our employees.

We safeguard this by:

- Employees have the right to form or join associations of their own choosing, and to bargain collectively
- Employees are aware of the purpose and function of local independently elected employee committees or similar bodies
- We allow employee representatives access to collective bargaining agreements and other relevant documentation needed to fulfill their duties
- We engage in good faith with independently elected employee representatives
- If employees have chosen not to be represented by a union, management and employees may address workplace-related topics in a suitable forum
- Where the right to freedom of association and collective bargaining is restricted or prohibited under law, we will not hinder employees from developing alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment, nor will we seek to influence or control these mechanisms



3.7 Forced and Bonded Labour

We ensure that all our employees work for the company on a voluntary basis, and not under threat of any penalty or sanctions.

We safeguard this by:

- All employees are entitled to a written employment contract or offer letters stating terms of engagement in the local language and stipulating their employment terms and conditions. We have a responsibility to ensure that all employees are aware of their legal rights and obligations
- We respect the right of employees to terminate their employment after reasonable notice and to receive all owed salary
- A worker whose employment is to be terminated shall be entitled to a reasonable period of notice or compensation in lieu thereof, unless he/ she is guilty of serious misconduct, that is, misconduct of such a nature that it would be unreasonable to require the employer to continue his/her employment during the notice period
- We respect the right of employees to leave the workplace after their shift
- Any third-party labour provider used by Novo Nordisk should be properly certified and/or licensed to operate by the competent public authorities.
- Any commissions and other fees in connection with employment of workers must be covered by Novo Nordisk. Deposits/financial guarantees/payments to obtain work are not allowed. We will never withhold original copies of employees' identity documents (e.g. passports, identity cards)
- If involuntary labour is confirmed in our operations, we will ensure that immediate measures are taken to remedy the situation and that any costs associated with the remedy will be borne by the business



3.8 Child Labour and Young Workers

We do not accept child labour. We acknowledge that, in accordance with the UN Convention on the Rights of the Child, a person is a child until the age of 18. We recognize the rights of every child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development.

We safeguard this by:

- No persons shall be employed at an age younger than 15, or younger than the legal age for employment if this is higher than 15
- All legal limitations regarding employment of persons below the age of 18 shall be followed. They should be protected from any hazardous work, night shift and any kind of work that might hamper their development or impose any physical harm
- Necessary measures shall be taken to prevent that no one under the legal age of employment is recruited. If there is any doubt as to whether a person meets the minimum age requirement, we seek original documentation of age (e.g. birth certificate) or additional evidence of age (e.g. medical examinations by a properly qualified physician)
- Any apprenticeship and/or traineeship programme should be genuinely beneficial to the skills development of employees
- If child labour is confirmed in our operations, we will ensure that measures are taken in the best interest of the child and that any costs related to the solution will be borne by the business



3.9 Grievance Mechanisms

We are committed to providing access to mechanisms for our employees to raise workplace-related grievances.

We safeguard this by:

- There are multiple entry points for employees to raise workplace-related grievances. Employees can raise concerns and complaints via their managers, through the local or Global People & Organisation or Legal function, Business Ethics Compliance Office or Group Internal Audit, annual Workplace Assessments, Facilitation and OurVoice surveys (can also be referred to as annual engagement surveys). Employees also have an option to contact the Novo Nordisk Compliance Hotline (in over 50 languages) or the Ombudsperson. All grievance mechanisms are available to employees in an appropriate language. Measures are taken for all concerns reported and every effort is made to maintain confidentiality
- If employees believe that a conflict arises between the language of this Labour Code of Conduct and the laws, customs and practices of the place where they work, if they have questions about this Labour Code of Conduct, or if they would like to report a potential violation of this Labour Code of Conduct, they should raise those questions and concerns through the existing processes
- We will not tolerate discrimination or retaliation against persons who in good faith file a report or participate in an investigation. Employees who believe that they have been retaliated against for reporting or participating in an investigation should immediately report any such retaliation to the Novo Nordisk Compliance Hotline, human resources, the legal department to Novo Nordisk's Ombudsperson or as specified locally
- All such reports will be investigated. All information, both verbal and written, will be kept confidential to the extent possible, taking into consideration the sensitivity of the case and the privacy of everyone involved
- We place importance on the provision of effective remedy wherever employees' rights have been found to have been negatively impacted. Our mechanisms do not obstruct access to other remedy procedures



3.10 Related Novo Nordisk Code of Conducts and Procedures

In addition, we have several procedures, guidelines, commitments and code of conducts for respecting and promoting the rights of our employees, such as:

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- The Novo Nordisk Way
 - Human Rights Commitment
 - Business Ethics Code of Conduct
 - Compliance Hotline & The Ombudsman Office
 - Facilitation and OurVoice (annual engagement surveys)
 - Novo Nordisk Modern Slavery Statement 2018
 - Occupational Health and Safety Code of Conduct
 - Diversity & Inclusion



4. Human Rights Due Diligence

In order to identify, prevent, mitigate and account for how we address adverse human rights impacts, People Compliance carry out human rights due diligence, of the rights of this Labour Code of Conduct. This process includes:

- Identifying and assessing actual and potential human rights impacts
- Integrating and acting upon the findings
- Tracking responses
- Communicating how impacts are addressed

The due diligence approach is implemented to meet the requirements set out in the UN Guiding Principles on Business and Human Rights and it is approached from an opportunity and risk management perspective to ensure it is cohesive and comprehensive across the company.



Change log

Edition no. 1.0

Effective date: 1 September 2014

In 2012 Novo Nordisk asked an external partner to do a human rights gap assessment of Novo Nordisk against the UN Guiding Principles on Business and Human Rights. The gap assessment identified a need for Novo Nordisk to prepare a global minimum standard on certain conditions for workers. Thus, the Global Labour Guidelines was prepared by People Compliance Office describing human and labour rights for Novo Nordisk employees in the workplace globally. The guideline includes, inter alia, the principles concerning fundamental rights in the eight ILO Core Conventions as set out in the Declaration on Fundamental Principles and Rights at Work. A benchmark against the international Bill of Human Rights was required to identify all relevant areas.

Edition no. 2.0

Effective date: 1 November 2019

Changes to document: General editorial updates and ensuring continuous alignment with the ILO Core Conventions.

Rationale for document change: Integration with Business Ethics Compliance Framework and the Business Ethics Code of Conduct. Moreover, to ensure greater coherence and convergence on labour standards and respect for UN Guiding Principles on Business and Human Rights and UN Global Compact.

Replaced documents: Novo Nordisk Global Labour Guidelines and Supporting Notes.

Edition no. 3.0

Effective date: 1 January 2022

Changes to document: The document changes reflect 1) the new global minimum standard of 8 weeks of paid leave for non-birthing parents, and 2) the new global policy on living wage.

Rationale for document change: The Labour Code of Conduct already includes paragraphs on leave and living wage and shall thus be updated to reflect the new leave standard and living wage policy.

Edition no. 4.0

Effective date: 1 January 2025

Changes to document: The document changes reflect 1) the new global minimum standard of 14 weeks of paid leave for non-birthing parents, and 2) the new global policy on caregivers leave.

Editorial corrections to the text in section 3.3 on leave.

Rationale for document change: The Labour Code of Conduct already includes a paragraph on leave and shall thus be updated to reflect the new leave standard. Caregivers leave is implemented as a new global benefit to employees.



Prepared and owned by: Novo Nordisk Global People Compliance Office