

Modern Slavery Statement

For the financial year 1 January 2025 to 31 December 2025

Introduction

With its headquarters in Denmark, Novo Nordisk A/S (**Novo Nordisk**) is a global healthcare company with over 100 years of innovation and leadership in diabetes care. Novo Nordisk has had a presence in Australia for 50 years.

This heritage has given Novo Nordisk the experience and capabilities that also enable us to help people defeat other serious chronic diseases including 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.

At Novo Nordisk, we recognise that modern slavery, including human trafficking, forced 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. We are committed to and respect human rights in our own operations, as well as ensuring compliance with the laws of the countries in which we do business.

This modern slavery statement has been prepared in accordance with the *Modern Slavery Act 2018* (Cth). This statement provides an update of the progress that Novo Nordisk Pharmaceuticals Pty Ltd (**Novo Nordisk AU**) has made during the financial reporting period 1 January 2025 to 31 December 2025 and will continue to make to reduce modern slavery in its operations and supply chain.

Our structure, operations, and supply chain

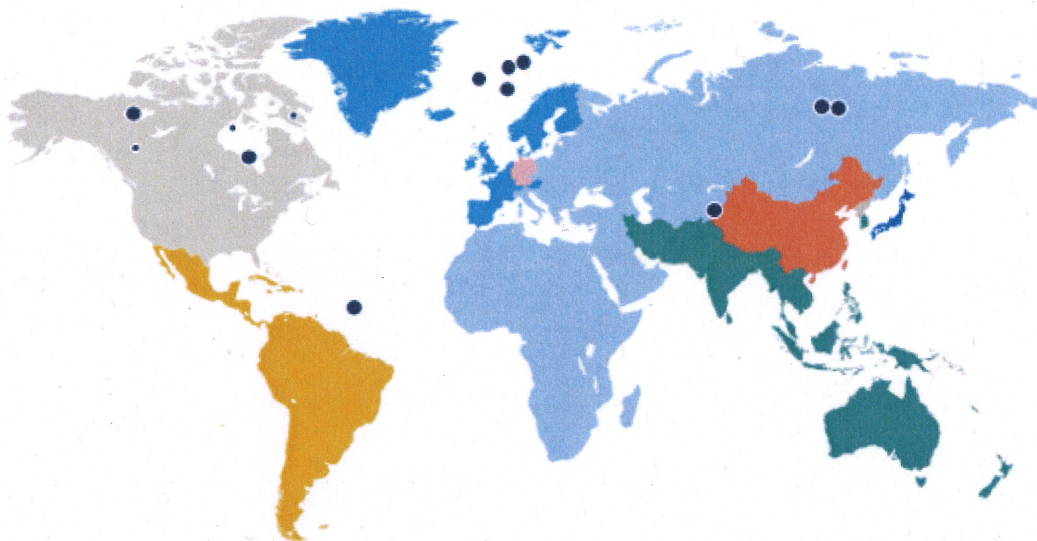
Our structure

Novo Nordisk AU is based in North Sydney and employs over 280 people in Australia. Novo Nordisk AU is part of the multinational Novo Nordisk company. The Australian operations fall under the umbrella of Novo Nordisk Oceania. Novo Nordisk Oceania oversees and manages the operations of both the Australian and New Zealand operations.

Our operations

Novo Nordisk employs more than 69,000 people in 80 countries. 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.

Novo Nordisk has research and development centres in Denmark, UK, US, mainland China and India. Novo Nordisk also has production sites in Denmark, Belgium, Italy, Ireland, Czech Republic, France, US, Brazil, mainland China, Russia, Algeria, Iran, and Japan.



Our supply chain

Novo Nordisk's success is dependent on its ability to collaborate with suppliers that not only provide the highest quality products and services but are aligned with its commitment to social and environmental responsibilities.

Through our own organisation and supply chain we source raw materials, components, and services to produce Novo Nordisk's 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 54,000 first-tier indirect suppliers that provide goods and services to support our business activities. This network supplies the products sold by Novo Nordisk AU.

The bulk of Novo Nordisk AU's unrelated direct suppliers are Australian-based companies providing goods and/or services in the following categories:

- Administration and support services
- Electricity, gas, and water services
- Financial and insurance services
- Information, media, and telecommunications
- Professional, scientific, and technical services
- Rental and real estate
- Postal services
- Training and education
- Transport services
- Warehousing and wholesaling

Risks of modern slavery in our operations and supply chain

Operations

The risk of Novo Nordisk AU's operations causing or contributing to modern slavery practices is assessed as low.

The majority of Novo Nordisk AU's employees are hired on a permanent basis. The people we engage as part of our operations are required to satisfy the requirements of roles which are professional and require a specific skill set and level of experience. We have arrangements with a very small select number of recruitment agencies. To reduce modern slavery practices, Novo Nordisk AU strives to comply with all workplace and industrial relations laws, regulations, and awards regarding employees and contractors. We select business partners who are a cultural fit, reputable, and known to deliver high quality services versus cost effectiveness, while endeavouring to be financially responsible.

Supply chain

The risk of Novo Nordisk AU causing, contributing, or being directly linked to modern slavery practices is assessed as low.

As a result of the global footprint of our suppliers and their operations, our supply chain is exposed to modern slavery risks because some of our suppliers have operations in higher risk jurisdictions.

Actions taken to assess and address modern slavery risks

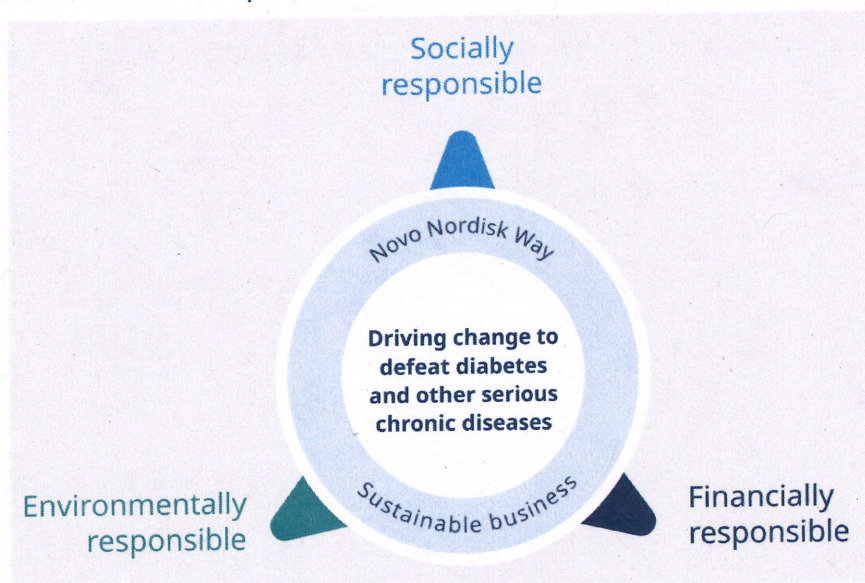
At Novo Nordisk, we are committed to being a sustainable business. To achieve this ambition, we strive to do business in a financially, environmentally, and socially responsible way, as reflected in our Articles of Association and the Novo Nordisk Way which provide general guidance to all employees on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

Novo Nordisk has established policies designed to mitigate risks in our supply chain. We expect that all our employees, contractors, and suppliers are aware of, and comply with the obligations set out in our policies.

To ensure that Novo Nordisk AU upholds its commitments and obligations to foster and maintain sustainable business dealings, we have established a sustainability partner role to develop, drive, and oversee sustainable initiatives, and compliance with applicable laws.

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.



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 the 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. 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; and
- 4) prevent and mitigate recurrence of actual negative human rights impacts and provide for remedy where necessary.

Novo Nordisk's [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 2 weeks of paid caregiver leave annually to

employees who need time off to manage caregiving responsibility for dependents with a critical health condition.



Novo Nordisk maintains its commitment to Diversity and Inclusion by continuing to foster an inclusive work 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 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. As part of our Responsible Sourcing Program, high risk suppliers are prioritised for Responsible Sourcing audits. A pre-audit survey on use of vulnerable workers can lead to an extended Responsible Sourcing 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 the majority performed in China. From these audits, findings in the main risk areas related to safety regulations and working hours specifically. Action plans are in place for all findings, and we are following up to ensure implementation and resolution of the issues.

Based on our annual supply chain risk assessment, audit findings, engagement with suppliers and input from experts and peers, we have defined the following areas of risk in our supply chain:

1. health and safety incidents;
2. suppliers' deficiencies of supplier due diligence and management systems.

These main risk areas are reflected in our Responsible Sourcing risk model, which identifies high risk suppliers based on country of production, annual spend and the types of activities which are known to present responsible business risks.

Based on the data and observations gathered by the Human Biosample Governance team from onsite evaluations, , Novo Nordisk has developed a risk-based global evaluation programme 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, in addition to 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.

As part of the bi-annual global Business Ethics risk management processes, all business units in the global organisation are required to identify, assess, mitigate, prevent, track, and internally report risks of adverse human rights impacts (including modern slavery risks).

Supplier conduct

Novo Nordisk strongly encourages suppliers to adhere to the Novo Nordisk OneCode. In the event suppliers are not prepared to adhere to our OneCode, we strongly encourage adoption of their own codes which include expectations similar to ours. Failure to comply may result in immediate termination of the business relationship.

Anti-bribery and anti-corruption

Bribery and corruption are major red flags for modern slavery risks.

Novo Nordisk is committed to the highest ethical standards of business conduct and endeavours to respect and comply with the law wherever we do business.

Novo Nordisk's OneCode requires that employees, contractors, and suppliers comply with all anti-bribery and corruption legislation, including but not limited to the U.S. Foreign Corrupt Practices Act of 1977, the U.K. Bribery Act and the United Nations Guiding Principles on Business and Human Rights, and any legislation relevant to the jurisdictions in which our affiliates are domiciled.

The Novo Nordisk OneCode encompasses, among other things, employee and contractor interactions with government officials, non-U.S. healthcare professionals and healthcare organisations, as well as third parties that provide goods and services to Novo Nordisk. Where appropriate, third parties that are assessed as high risk are subjected to anti-bribery and corruption due diligence and auditing, as well as ensuring their own subcontractors comply with the Novo Nordisk OneCode.

Novo Nordisk also ensures that it complies with applicable pharmaceutical laws and regulations governing pre-clinical and clinical studies, manufacturing, distribution, marketing, and promotion of its products.

Risk assessment and verification

As a global organisation with a global supply chain model, verification and monitoring of supplier compliance with laws and regulations, as well as the Novo Nordisk OneCode and adherence to the Responsible Sourcing Programme, are conducted globally through formal assessment and audits. As a member of the Novo Nordisk global supply chain, Novo Nordisk AU relies on Novo Nordisk's global Responsible Sourcing Programme to assess risk at its supplier level.

Raising concerns

Novo Nordisk encourages an open and honest culture of trust and integrity. Part of building a culture of trust is speaking up about any ethical or compliance concerns so we can address possible issues. By speaking up, employees are doing the right thing and contributing to an ethical culture at Novo Nordisk.

Novo Nordisk employees, contractors, suppliers, as well as other external stakeholders including affected people can report concerns of modern slavery and other negative human rights impacts securely and confidentially via Novo Nordisk's Compliance Hotline.

Contract clauses

Novo Nordisk has implemented a responsible sourcing clause which encompasses modern slavery and human rights into its standard global agreements for procuring goods and services.

Novo Nordisk AU has further implemented a modern slavery specific clause into its standard Australian agreements where we procure goods and/or services. Such a clause will also be added to Novo Nordisk's:

- Purchase Order Terms and Conditions; and
- Standard Supplier Terms.

For contracts that are not on Novo Nordisk's terms and/or when material contracts are renewed, we will seek to include modern slavery clauses where they are absent.

Training and development

At Novo Nordisk, employees are required to undergo regular Ethics and Compliance training. Throughout 2025, a series of human rights training sessions, workshops and awareness activities including human rights e-learning were delivered for continuous development of human rights awareness and capabilities. Annual training in Ethics and 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% not completed primarily 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.

Novo Nordisk does not tolerate bullying, discrimination or harassment and provides regular training in relation to its policies on this.

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;
- The UN Global Compact;
- The Nordic Business Network for Human Rights;
- The Pharmaceutical Supply Chain Initiative; and

Due diligence in our operations and our supply chain base

Based on desk research and data from the United Nations, 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; and
- 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; and
- 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 risk of potentially serious exploitation for donors, especially if they are in vulnerable positions. Since 2015, Novo Nordisk's Human Biosample Governance experts have conducted over 600 evaluations of human biosamples suppliers, contract research organisations and external collaborations involving human biosamples, including more than 100 onsite evaluations. [HERE](#)

Measuring the effectiveness of our actions

Novo Nordisk AU assesses the effectiveness of identifying and managing modern slavery risks by listening and responding to concerns raised by customers and other stakeholders on a wide range of issues in a responsible manner. This includes how we manage our operations and supply chain.

Novo Nordisk AU intends to further improve the way it identifies and manages modern slavery risks by:

- continuing to review current business practices with respect to Novo Nordisk's ethics and compliance and identifying opportunities to further reduce modern slavery risks;
- continuing to enhance the due diligence review process of our third party suppliers and providing further training and tools to employees on this;
- continued training for all people managers on whistleblowing processes and how to handle protected disclosures including any potential modern slavery instances;
- working with suppliers to check how they are progressing any actions they have put in place to address modern slavery risks to ensure they are compliance with the Novo Nordisk OneCode; and
- participating in Novo Nordisk's regular auditing of suppliers to ensure they meet appropriate standards.

Conclusion

Novo Nordisk AU is committed to continuous improvement in our efforts to identify and prevent human rights failures or abuses in our supply chains. As we make further progress in the above areas, we will report on that progress through subsequent versions of this statement.

For over 100 years, Novo Nordisk has been committed to driving change to defeat diabetes and other serious chronic diseases. The Novo Nordisk OneCode is built on Novo Nordisk's values and doing business within an ethical framework and with integrity. This purpose does not come at the expense of those involved in our business deals or those of others.

Approval

This statement was approved by the Board of Directors of the reporting entity Novo Nordisk Pharmaceuticals Pty Ltd on 24 April 2026.



Michael Azrak
General Manager Oceania