

Novo Nordisk Canada Inc.

Canadian Modern Slavery Statement 2024

This Canadian Modern Slavery Statement 2024 has been developed in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Canadian Act”) and has been filed accordingly with Public Safety Canada. This general statement sets out the steps taken by Novo Nordisk Canada Inc. (“NNCI” or the “Reporting Entity”) in this regard during the financial year ending 31 December 2024. This statement also references activities that NNCI’s parent company Novo Nordisk A/S (“Novo Nordisk”) has engaged in as a supplier to NNCI, to the extent these activities are relevant to NNCI and its activities in Canada. References to “we”, “us” and “our” in this report only includes NNCI unless otherwise specified.

In general terms, the steps that Novo Nordisk has taken during the reporting period to prevent and reduce the risks of forced labour and child labour in its operations and supply chains, details of which are set out in this report, include the following activities which directly affect NNCI:

- Mapping its direct supply chains;
- Conducting an internal assessment of risks of forced labour and/or child labour in its activities and direct supply chains; and
- Implementing certain due diligence policies and processes for identifying and mitigating the use of child labour in its activities and direct supply chains.

At NNCI, we recognize 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 as guided and led by Novo Nordisk to understand what these risks are and to manage them accordingly.

About Novo Nordisk

With headquarters in Denmark, Novo Nordisk, a Danish corporation, is a global healthcare company with over 100 years of innovation and leadership in diabetes care. This heritage has given Novo Nordisk the experience and capabilities that also enable them to help people defeat other serious chronic diseases: obesity, haemophilia and growth disorders as well as expanding research and development efforts into other areas such as cardiovascular, liver and kidney diseases related to diabetes and obesity. Novo Nordisk employs more than 77,000 people in 80 countries.

NNCI is an Ontario corporation and is indirectly owned and controlled by Novo Nordisk via a Danish holding company, Novo Nordisk North America Operations A/S.

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 they reached over 45.2 million people living with diabetes and obesity worldwide, with more than 8.4 million people living with diabetes reached through their access and affordability programmes. Novo Nordisk has research and development centres in Denmark, UK, US, mainland China and India, and production sites in Denmark, France, US, Brazil, mainland China, Russia, Algeria, Iran, and Japan.

NNCI operates as a pharmaceutical sales and distribution company for Novo Nordisk's products in Canada and Bermuda.

Novo Nordisk's supply chain

Through Novo Nordisk's own organisation and supply chain, raw materials, components, and services are sourced 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 its business activities.

NNCI imports pharmaceutical products into Canada that are produced by Novo Nordisk and certain of its affiliates which are manufactured in places outside of Canada (including Denmark and the United States), components of which may be sourced from higher risk countries. NNCI also procures various consulting and other services (such as marketing and finance) from direct suppliers primarily located in Canada.

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 of Novo Nordisk among other members. Consolidated findings of Business Ethics reviews and risks are reported to Novo Nordisk's Executive Management and the Audit Committee, which comprises members of the Board of Directors of Novo Nordisk. The responsibility to implement respect for human rights in daily operations sits in the Business Ethics Compliance Office reporting to the Group Chief Compliance Officer.

These due diligence and human rights risk management operations implemented by Novo Nordisk directly impact NNCI and its affiliated activities. NNCI also has a Legal, Ethics and Compliance department with additional oversight over its Canadian business.

Novo Nordisk Way

At NNCI, we are committed to Novo Nordisk's ideals of being a sustainable business. To achieve this ambition, we strive to do business in a financially, environmentally, and socially responsible way. This commitment is reflected in the "Novo Nordisk Way" that NNCI continuously aims to follow, which provides general guidance to all employees (including employees of NNCI) on how we conduct responsible business.

Human Rights policy commitment and other policies

[Novo Nordisk's commitment to respecting human rights](#), which is guided by [the UN Guiding Principles on Business and Human Rights](#), is anchored in Novo Nordisk's [OneCode](#), outlining the principles for working at Novo Nordisk (including NNCI). This commitment refers to all human rights expressed in the International Bill of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work. Novo Nordisk explicitly commits to prohibition, prevention, and mitigation of forced, bonded or debt labour, slavery, servitude, and human trafficking and providing access to remedies. In addition, they 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 (including employees of NNCI) 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 Novo Nordisk's 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; and
- 4) Prevent and mitigate recurrence of actual negative human rights impacts and provide for remedies where deemed 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
- Persons below the age of 18 are protected from any hazardous work and night shifts.

All employees of Novo Nordisk earn sufficient income of a minimum 20% above living wage in a standard working week to meet their basic needs (and those of their families). As of 1 January 2024, 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 both for birthing and non-birthing parents. Novo Nordisk also now offers 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's guidelines for responsible business conduct consistent with applicable laws and internationally recognized standards. It details Novo Nordisk's global compliance principles and expectations of how Novo Nordisk supplier partners conduct business across cultural and legal differences among countries where they produce, source, receive goods or require services. Novo Nordisk expects its supplier partners to adhere to the strictest applicable requirements. The majority of key direct supplier partners engaged with Novo Nordisk are provided with the latest copy of the Responsible Sourcing Standard and are requested to adhere to it. In 2024, the content of the Responsible Sourcing Standard was revised and strengthened. As part of this update, Novo Nordisk reinforced its commitment to prevent modern slavery in its supply chain. As a supplier of Novo Nordisk's products in Canada, NNCI supports this commitment.

NNCI also has in place an independent Occupational Health and Safety Policy and a Harassment and Violence-Free Workplace Policy that helps promote a safe and secure workplace for our employees. NNCI complies with all applicable laws related to domestic human rights and labour matters.

Responsible Sourcing Programme

The Responsible Sourcing Programme was initially developed in 2002 and has since been updated regularly to provide comprehensive guidance with Novo Nordisk's requirements for responsible business conduct towards suppliers, consistent with applicable laws and internationally recognized standards. All supplier partners engaged with Novo Nordisk are requested to act with integrity and to adhere to the Responsible Sourcing Standards. The Responsible Sourcing Programme is integrated into

Novo Nordisk sourcing and procurement processes. Novo Nordisk's Global Procurement team 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 Novo Nordisk's strategic production sites.

Based on annual supply chain risk assessments, audit findings, engagement with suppliers and input from experts and peers, Novo Nordisk has defined the following main risk areas in its 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 the 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 Novo Nordisk's Responsible Sourcing Programme, high risk suppliers are prioritized 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 Novo Nordisk is following up to ensure implementation and resolution of the issues. NNCI's supply chain may be eligible for audits performed by Novo Nordisk.

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, Novo Nordisk assessed modern slavery risks in its value chains.

To identify sectors and categories with high modern slavery risks, Novo Nordisk 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

This information also applies to NNCI's indirect supply chains for the manufactured products that it purchases from its other affiliates (including Novo Nordisk) and imports into Canada.

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

These assessments have led Novo Nordisk 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

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

In addition to the above areas, Novo Nordisk has 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 of donors, especially if they are in vulnerable positions. Since 2015, Novo Nordisk's Human Biosample Governance experts have conducted more than 500 evaluations of human biosamples suppliers and external collaborations involving human biosamples, including close to 100 onsite evaluations. This experience has given Novo Nordisk certain data and insights on different risks by country. Novo Nordisk continuously strengthens its 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.

NNCI considers the due diligence performed and the actions described in this report as being sufficient to mitigate risks of child labour in Novo Nordisk's own operations and supply chain. No indications of child labour were observed in Novo Nordisk's own operations, whereas the potential risks of child labour in Novo Nordisk's Tier 1 (direct) supply chain are deemed to be low and adequately mitigated.

NNCI has not conducted any independent mapping of its own supply chains outside of any mapping completed by Novo Nordisk, given it sources the majority of products from its corporate affiliates, including Novo Nordisk. Accordingly, the information in the paragraphs above under this section only applies to NNCI's finished manufactured products that it imports into Canada from Novo Nordisk and other corporate affiliates.

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. This accordingly captures NNCI's indirect supply chains as it relates to pharmaceutical products sourced from Novo Nordisk for importation into Canada. In the normal course, 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 implemented a risk-based global evaluation program, without compromising the risks associated with sourcing and using human biosamples. The 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, Novo Nordisk conducts desk-based assessments 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, Novo Nordisk conducts 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). As part of the Ethics & Compliance risk management process, several subsidiaries have 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

Novo Nordisk regularly conducts Ethics & Compliance training to all employees (including employees of NNCI). 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 (including employees of NNCI). In 2024, 99% of employees completed and documented their training, with the remaining 1% missing mainly due to employees being on leave.

NNCI also has internal initiatives to raise awareness on Ethics and Compliance topics. We also take part in Ethics Days held annually which cover different Ethics and Compliance topics, including Human Rights.

An e-learning module 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 onboarding programme for new employees to the Global Procurement organisation 4 times a year. In addition, NNCI provides workplace health and safety training to all employees and additional training to people managers.

Stakeholder engagement and collaborations

Novo Nordisk engages with peers and experts to seek continuous improvements in their 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

There is nothing to report with respect to any remediation measures taken by the Reporting Entity.

Novo Nordisk employees (including employees of NNCI) 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.

Approval and attestation pursuant to the Canadian Act

This report was approved pursuant to subparagraph 11(4)(a) of the Canadian Act by the board of directors of Novo Nordisk Canada Inc.

I make this attestation in my capacity as President of Novo Nordisk Canada Inc. for and on behalf of the board of Novo Nordisk Canada Inc.



Vincenzo Lamanna

President, Novo Nordisk Canada Inc.

Date: May 12, 2025

I have the authority to bind Novo Nordisk Canada Inc.