

# UK Modern Slavery Act Statement - 2024

This statement is published in accordance with section 54 of the UK Modern Slavery Act 2015 and outlines the corporate governance framework of H. Lundbeck A/S ("Lundbeck") in relation to preventing, identifying, and mitigating risks related to modern slavery and human trafficking.

The statement applies to the entirety of Lundbeck's global activities performed in the financial year of 2023, and acts as a supplement to Lundbeck's Sustainability Report 2023.

### **Our Organisation**

Lundbeck is a global pharmaceutical company highly committed to improving the quality of life of people living with brain diseases. With a head office in Denmark, research facilities in Denmark and the U.S., and a vertical production set-up in Denmark (2 sites), Italy (1 site), and France (1 site), Lundbeck's products target disease areas within psychiatry and neurology.

Lundbeck employs approximately 5,600 people across more than 50 countries. In the UK, Lundbeck acts through its subsidiary Lundbeck Limited, which was founded in 1972 and employs approximately 31 people. Activities are centred around marketing our medicines to the NHS and ensuring continued supply of our medicines. We also have a small Clinical Research Unit consisting of approximately 13 people who are based in the UK but report directly to the Head Office in Denmark.

# **Our Commitment**

Lundbeck is committed to end all forms of human slavery; servitude; human trafficking; child labour; and forced, bonded, or compulsory labour (Modern Slavery). Lundbeck's general framework for respecting human rights is based on the UN Guiding Principles for Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the UN Global Compact Principles, the fundamental ILO conventions, and on our commitment to support specific Sustainable Development Goals (SDGs) and subsequent SDG targets. Specifically regarding forced and bonded labour, our work is based on the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, and ILO conventions C29 (and the 2014 protocol) and C105.

Our commitment to respect human rights and condemn all forms of Modern Slavery applies to our own operations globally, collaborations with external parties throughout our global value chain, and our sphere of influence within the pharmaceutical industry.

# **Collaborations**

Lundbeck engages with an extensive network of suppliers and third parties worldwide, from research and development to production and commercial activities. We acknowledge that there is a risk of modern slavery and human trafficking within all businesses, even those based within the UK, and we are particularly aware of the risks within the pharmaceutical industry and when entering collaborations or engaging with third parties and suppliers.



Our actions to prevent such adverse impacts take different forms operationally, but the essential principles are derived from our Code of Conduct, our commitment to the UN Global Compact, and our commitment to respecting human rights as defined by the UN Guiding Principles on Business and Human Rights.

### **Due Diligence Processes**

Lundbeck applies a risk-based approach when engaging with suppliers. Through our due diligence processes, we aim to identify potential risks associated with collaborations and to take appropriate mitigating actions to address potential adverse impacts. With regard to Modern Slavery, we have not identified any high-risk areas in relation to our operations in the UK. In our global value chain operations, we have a potential risk of negative impact in relation to chemical suppliers in high-risk countries. In our commercial operations, focus is placed on transport and logistics as well as on manual labour in warehouses and distribution centres.

Lundbeck's due diligence processes aim to mitigate risks by verifying that relevant suppliers meet Lundbeck's ethical standards and compliance requirements. The process consists of reviewing documents provided by prospective or existing partners and conducting research using databases, public registries, and open-source tools. We also perform environmental and social audits in high-risk countries in which our supply chain operates. If relevant, corrective action plans are agreed upon with the relevant external party and implementation is supported and monitored by Lundbeck. If corrective actions are not satisfactorily implemented, the collaboration is not entered into or is terminated.

Third parties and suppliers are contractually bound to adhere to local and internationally recognized anticorruption, labour rights, human rights, and environmental standards as dictated by the UN Global Compact. Third Party Intermediaries are specifically requested to acknowledge and comply with Lundbeck's Code of Conduct by including Lundbeck's Third Party Obligations in their contract.

A continuous open dialogue with our suppliers and third parties is essential for maintaining trust. We support this dialogue through training of our own and external staff on relevant issues, performance monitoring, and compliance audits.

#### Performance

In 2023, Lundbeck performed 164 internal and 211 external audits, 66 of which were audits on suppliers and third parties. Further, we performed 227 due diligence screenings of actual and potential suppliers and third-party intermediaries by examining publicly available sources to identify potential risks. Further details on our social performance can be found throughout Lundbeck's 2023 Sustainability Report.

# **Reporting Concerns**

Lundbeck has established a Compliance Hotline. The Compliance Hotline is a secure and confidential reporting (whistleblower) channel available in 40 languages managed by an independent provider. It enables internal and external stakeholders to report legal or other serious concerns on topics covered by Lundbeck's Code of Conduct as well as human rights. Whistleblowers are protected by Lundbeck's Non-Retaliation policy.

Personnel employed by Lundbeck may also report any work-related issues and concerns to Lundbeck's Ombudsman.

Any person within or outside Lundbeck who does not wish to (or is not able to) use the above grievance mechanisms is encouraged to report a concern or adverse impact either by e-mail or regular post:



E-MAIL: <a href="mailto:compliance@lundbeck.com">compliance@lundbeck.com</a>

or

**REGULAR POST:** Corporate Legal, Compliance & Sustainability, Ottiliavej 9, DK-2500 Valby, DENMARK.

#### **Relevant Documents and Further Information**

For further information and documentation, please follow the below links:

- Lundbeck's Code of Conduct
- Lundbeck's Third Party Obligations
- Lundbeck's Sustainability Report 2023
- Supplier and Third-Party Obligations
- Lundbeck's Compliance Hotline
- Lundbeck's Human Rights Statement
- About Lundbeck

Previous years' UK Modern Slavery Act Statements can be found on the UK Government Registry.

Charl Van Zyl, President and CEO

Copenhagen, 24 June 2024