

COMPLIANCE HOTLINE

Introducing the New Compliance Hotline

Change drivers

Lundbeck has had a whistleblower process in place since 2009 as this is a critical component of any compliance monitoring system. It enables companies to identify and mitigate potential risks at an early stage before they impact on operations, reputation and ultimately financial performance. Now it is time to introduce a new Compliance Hotline, which has three key improvements:

Optimised reporting process

All reports are submitted in a professional case management system which is hosted by the World's leading External Provider, Navex. Lundbeck has defined the roles and responsibilities of all stakeholders involved in investigations and provides specific guidance on how to conduct investigations in accordance with Lundbeck and external requirements.

Increased accessibility

Reports can be submitted via both telephone and online 24/7. Telephone calls can be made in 40 languages whereas internet reports can be submitted in 11 languages. In contrast to the old solution, the Lundbeck Compliance Hotline can also be accessed by External Stakeholders.



A secure and confidential way of reporting

All information relating to allegations will be managed in the secure case management system in accordance with applicable data protection regulations. Only designated Lundbeck Experts may access the information in the system. Personal data relating to cases that are not substantiated will be deleted from the Case Management System, except if the cases need to be retained for subsequent external inspections by government authorities.

Enforcing Lundbeck standards

If an investigation confirms the concern appropriate actions will be taken in order to prevent any re-occurrence. This may also include disciplinary sanctions if the employees are found to have breached Lundbeck's Code of Conduct.

QUICK FACTS

Available 24/7

Reports can be submitted in 40 languages via telephone and 11 languages via internet

All reports submitted are protected in accordance with applicable Data Protection regulations

Accessible for External Stakeholders via lundbeck.com

Lundbeck's Global Investigation Procedure defines the roles, responsibilities and requirements to investigation processes

FREQUENTLY ASKED QUESTIONS

How does the Lundbeck Compliance Hotline work?

Compliance Hotline is accessible by both phone and online. If you make a report directly by telephone, you will speak with one of Navex's expert operators who enter all relevant information into a secure case management system. You will then be provided with a PIN number by the Operator, which will enable you to communicate with investigators and follow up on the case. If you submit a report online, the system will guide you through reporting process and this PIN number will be generated automatically once you complete the reporting template.

What is Lundbeck's non-retaliation policy?

Lundbeck will not accept any retaliation or discrimination against any employee or external stakeholder who uses our Compliance Hotline in good faith or participates in an investigation. Any employee who breaches this policy will be subject to disciplinary actions.

Can I report an issue anonymously?

Yes, you can choose to remain anonymous when reporting your concern. There are exceptions to this rule however in countries such as Spain and Portugal. We encourage you to identify yourself where possible as this will enable us to investigate your report more effectively. If you provide your name, Lundbeck will protect your confidentiality to the greatest extent possible during the investigation.

How can I communicate with the Investigator if I wish to remain anonymous?

You will be able to follow the status of the case and to communicate with the Investigator by entering your case PIN number in the case management system. No party is able to contact you directly however if you have chosen to remain anonymous.

How do I make a credible report?

When reporting your issue, you should ensure that you provide as much relevant information as possible, for example: the names of persons involved in the alleged conduct; potential

witnesses; relevant documentation and or data; visual evidence etc. This will allow the Lundbeck Investigator to effectively follow up on your report.

What is the process after I have made a report?

A designated employee from Lundbeck's Corporate Compliance & CSR will review your report in the secure Case Management System. If the allegations fall within the scope of the Compliance Hotline, a trained Lundbeck expert will be assigned to conduct the investigation.

How will the investigation be performed?

The investigation may include interview with relevant witnesses, review of records, computers, telephones and other equipment in accordance with relevant personal data regulations. The investigation conclusions and recommendations are reported to Lundbeck's General Counsel and selected persons on a strictly need to know basis.

