

What may be reported?

Only concerns that involve either legal, serious financial or reputational risks to Lundbeck are to be reported via the Compliance Hotline. These issues include but are not limited to the following:

Concerns Category	Examples
Financial	<ul style="list-style-type: none"> • Misappropriation of assets including theft and misuse • Unlawful behaviour in connection with accounting principles, internal accounting controls or auditing matters • Deliberate errors in the preparation or maintenance of financial statements or records
Business Ethics	<ul style="list-style-type: none"> • Serious conflicts of interest • Payment of bribes or facilitation payments • Unethical gifts and donations to business partners, Healthcare Professionals (HCP) or Government Officials • Alleged breaches of competition law
Unlawful promotion and marketing	<ul style="list-style-type: none"> • Non-compliant events • Allegations of off-label promotion • Misuse of product samples
Quality	<ul style="list-style-type: none"> • Serious misconduct related to Good Manufacturing Practice (GMP), Good Clinical Practice (GCP), Good Laboratory Practice (GLP) and pharmacovigilance
Animal Ethics	<ul style="list-style-type: none"> • Serious misconduct relating to animal ethics legislation or Lundbeck procedures
Health, Safety and Environment	<ul style="list-style-type: none"> • Serious misconduct relating to health, safety and environment legislation or Lundbeck procedures
Supplier evaluation	<ul style="list-style-type: none"> • Serious misconduct or major breaches by Third Parties or Suppliers relating to Lundbeck's Code of Conduct and/or supplier obligations
Employee relations	<ul style="list-style-type: none"> • Workplace harassment, threats and discrimination¹

¹ Concerns involving personal or organisational conflict which cannot be solved through dialogue with management or HR. e.g. dismissals or warnings or/ and cases related to mental health and working environment or conflicts in relation to personal development can be addressed to Lundbeck's Ombudsman

What may not be reported?

The following concerns may not be reported via the Compliance Hotline:

Examples

- Incompetence of colleagues or employees
- Dissatisfaction with pay, holiday or promotion
- Disagreements with colleagues or minor violations
- Complaints about equipment malfunctions
- Minor safety in the workplace issues and concerns about office environment
- Complaints about breaches of smoking, alcohol or email policies and dress codes