

## Lundbeck's Code of Ethics - External Partner Principles

### 1. BACKGROUND & PURPOSE

Lundbeck has adopted a Code of Ethics for its organization and employees, outlining commitments to fostering an ethical and sustainable work culture and business practices. This document supplements the Code of Ethics by outlining Lundbeck's expectations for ethical and compliant conduct by any External Partner<sup>1</sup> performing activities<sup>2</sup> either on behalf of or in the material interest of Lundbeck. The objective is to ensure that all such activities are conducted with integrity, professionalism, and respect for applicable laws, codes, regulations, and ethical standards.

### 2. ETHICAL FOUNDATION & SHARED COMMITMENT

Lundbeck views its External Partners as extensions of its ethical culture. Therefore, each External Partner must internalize the relevant principles as set out below in **section 3 'Principles for ethical collaboration'** and apply them thoughtfully in daily work, recognizing that ethical decisions often require navigating ambiguity with integrity and care.

An External Partner must be equipped to recognize when a situation requires deeper reflection, consultation, or escalation. Acting ethically means being aware of potential consequences, considering broader impacts, and having the courage to pause or speak up when something feels off.

Finally, each External Partner must ensure that all relevant employees and sub-contractors are aware of relevant obligations and trained as needed. If any acts or omissions that conflict with these obligations are suspected, the External Partner must notify Lundbeck without unreasonable delay via [www.lundbeck.com](http://www.lundbeck.com).

The version of this document in effect at the time of execution of the Agreement or the latest amendment thereof shall apply.

### 3. PRINCIPLES FOR ETHICAL COLLABORATION

*External Partners must undertake to comply with the following principles:*

#### **3.1. Integrity and professionalism**

Shall act with integrity and professionalism, especially in complex or uncertain situations. Decisions shall be guided by transparency, fairness, and a commitment to doing what is right - not just what is permitted. This includes avoiding conflicts of interest and ensuring that actions reflect ethical principles including in situations involving external pressure.

#### **3.2. Working environment**

Shall provide a safe and healthy working environment and support the well-being of workers. They shall uphold fair working conditions, foster inclusive and safe workplaces, and treat all individuals with dignity and respect.

#### **3.3. Respect for human rights**

Shall respect all internationally recognized human rights (i.e., Universal Declaration of Human Rights and the ILO conventions) and commit to implementing appropriate due diligence measures to identify, prevent, and mitigate human rights risks. They shall also ensure access to a safe grievance channel for both employees and workers in the value chain.

#### **3.4. Anti-corruption**

Must maintain and enforce policies and procedures to prevent bribery, facilitation payments, and other forms of corruption, consistent with a zero tolerance approach.

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<sup>1</sup> External Partner defined as: Broadly includes all third parties (of which Third Party Intermediaries are a sub-set) across the value chain with whom Lundbeck engages, including suppliers, distributors, consultants, etc.

<sup>2</sup> The relevant activities performed by External Partners include, but are not limited to, non-clinical safety research and other research activities, clinical research, interactions with authorities e.g. customs or medicines agencies, development and manufacturing of Lundbeck medicinal products, market access activities, medical information or promotional activities, sales and marketing activities including distribution and public relations activities, as well as developing and/or managing core IT applications.

Must also disclose without unreasonable delay any conflict of interest that could influence the performance of its tasks or the delivery of services to Lundbeck.

### **3.5. Responsible engagement**

Shall ensure that interactions with healthcare professionals, authorities, competitors, and patient organizations are grounded in legitimate purpose and conducted with integrity. These engagements must reflect professionalism, transparency, and mutual respect. Influence must be exercised responsibly, avoiding conduct that could be perceived as manipulative, self-serving, or unfair.

Shall contribute to a fair and open marketplace by respecting competitive boundaries and avoiding practices that distort market dynamics. Agreements must be clearly defined, compensation appropriate, and all engagements aligned with ethical standards and applicable laws. The goal is not only to comply, but to foster trust and uphold the credibility of the broader healthcare ecosystem.

### **3.6. Transparency and accountability**

Shall maintain clear and accurate records, disclose relevant information, and support oversight activities. Ethical conduct includes acknowledging mistakes, correcting course when needed, and being open to dialogue. Transparency is not only a compliance requirement; it signals trustworthiness.

### **3.7. Scientific integrity**

Shall demonstrate a commitment to scientific integrity, human dignity, and animal welfare in all research and development activities. This includes adherence to applicable laws, regulations, licenses, and voluntary guidelines for the use of animals in biomedical research, as well as ensuring that clinical research activities are ethical, patient-centered, and, at a minimum, comply with current international requirements and regulations.

### **3.8. Ethical promotion and patient safety**

Shall promote medicinal products responsibly, using approved, accurate materials and respecting regulatory boundaries. Promotional activities shall not be conducted in a manner that inappropriately influences prescribing behavior or circumvent applicable regulatory approvals. Off-label promotion is prohibited, and any related information must be handled in accordance with local laws and Lundbeck procedures. Samples must be distributed only upon request and with full accountability.

Any suspected adverse events associated with the use of a Lundbeck product shall promptly be reported to Lundbeck via [www.lundbeck.com](http://www.lundbeck.com) or in accordance with the reporting requirements set out in the pharmacovigilance agreement, where such an agreement is in place.

### **3.9. Reporting of non-compliance**

Must comply with all applicable laws and regulations relating to the reporting of concerns and protection of whistleblowers, including any obligation to establish and maintain appropriate whistleblower schemes where required by law. If a whistleblower scheme is established, the External Partner shall ensure individuals are able to raise concerns in good faith regarding potential non-compliance (including with the principles of this document) without fear of retaliation. Each External Partner shall properly investigate and take corrective and remediation actions where required.

Where and when relevant, each External Partner shall encourage the use of the **Lundbeck Compliance Hotline**, available at [www.lundbeck.com](http://www.lundbeck.com) for concerns related to Lundbeck's value chain. Lundbeck strictly prohibits retaliation against anyone who reports a concern or participates in an investigation.

<b>Change Log</b>	
<b>Version No.</b>	<b>Reason for the Change / Revision</b>
1.0	New document: Provides guidance on Lundbeck's business conduct expectations when engaging with External Partners. Furthermore, aligns with Lundbeck's Code of Ethics (effective 1Oct25).