Code of Conduct

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Dear Colleagues

The Code of Conduct has been developed to guide you when dealing with ethical dilemmas, as well as inform you about acceptable conduct within the areas that are most critical to our business. The Code of Conduct applies to all aspects of our daily work, whether dealing with healthcare professionals, patients and patient organisations, regulators, payers, scientific and business partners or with any other members of society.

Lundbeck wants to improve the quality of life for those suffering from psychiatric and neurological disorders. We will pursue this ambition and expect all our employees to act in accordance with our corporate values by being: Imaginative, Passionate and Responsible.

Being compliant with applicable laws, regulations, guidelines and industry standards is at the foundation of being responsible. It is imperative that Lundbeck’s employees observe and follow all local regulations in the countries where we do business, even when the local regulations are stricter than our Code of Conduct.

I am confident that our Code of Conduct and the supporting structures will help you resolve the ethical or compliance issues that may arise as part of your job. I rely on you to familiarise yourself with and comply with current regulation and Lundbeck’s Code of Conduct.

Lundbeck is committed to doing business in an ethically responsible way, and I want to give everyone the best possible conditions to live up to this commitment. We are committed to foster a workplace which encourages open communication on business practices. We will protect any employee from retaliation when they report a concern in good faith, for instance by using the whistleblower function. On the other hand, failure to comply with our Code of Conduct at any level in the organisation may lead to disciplinary action.

By embracing these standards and continuously monitoring compliance we will continue to uphold Lundbeck’s reputation as a respected and responsible pharmaceutical company.

Ulf Wiinberg

*President and CEO of Lundbeck*
How to use the Code of Conduct

This Code of Conduct presents the conduct that is accepted in the Lundbeck Group for the issues that are of most critical importance to the pharmaceutical industry.

The Code of Conduct covers issues related to the way we interact with our stakeholders and issues originating from our value chain. Issue by issue it describes Lundbeck's commitments, the established procedures and the conduct expected from our employees. Definitions are provided for specific terms that are marked with an asterisk*.

Our employees and third parties working on behalf of Lundbeck are obliged to observe the Code of Conduct, and adhere to local regulations or standards, even when they are stricter than the Code of Conduct. In case of breaches, Lundbeck will follow up and take disciplinary action.

Even though the Code of Conduct is comprehensive, it can obviously never cover all situations that may arise as part of our daily work. Therefore, you are always expected to use your common sense and ask your manager for guidance, if you are unsure how to act in a given situation.

How to raise a concern

An open and honest dialogue on the issues in this Code of Conduct is a precondition for us to maintain and continuously strengthen our integrity.

Lundbeck is committed to support you, if you are concerned about or experience actual breaches of the Code of Conduct. Your manager is instructed to help you resolve dilemmas and to openly discuss concerns you may raise.

If you think a concern will not be properly addressed within the hierarchy, you can approach:

- **Group Planning & Reporting**
  - Financial issues

- **Corporate Legal**
  - Legal issues and claims

- **The HR manager attached to your unit**
  - HR issues, issues with your superior or manager

- **The Lundbeck Ombudsman**
  - Personal or organisational conflicts that cannot be resolved with your manager or HR

- **Lundbeck Compliance Hotline**
  - Breaches of the Code of Conduct involving legal, serious financial or reputational risks

Lundbeck will not accept any retaliation against anyone who raises a concern in good faith. Failing to report a breach may in itself be a breach of the Code of Conduct.

Improving the Code of Conduct

Should you have suggestions for improvements to the Code of Conduct, please contact Corporate Compliance & CSR on compliance@lundbeck.com.
Responsible and transparent interactions

At Lundbeck, we are committed to achieving our business goals on the merits of our products, knowledge and services. Interactions with our stakeholders* are kept responsible and transparent and shall ensure effective and safe use of our medicines to enhance the quality of life of our patients.

Lundbeck will ensure that

- Our employees and third parties* are instructed to be familiar with local laws and our Code of Conduct and to act in compliance with these standards.
- Our employees and third parties* act with professionalism and do not jeopardise the integrity of our stakeholders*.
- Publication activities will be undertaken in a responsible and ethical manner, to ensure that all relevant information is communicated clearly and in a timely way.
- Our employees and third parties* perform their work in the interest of Lundbeck without bias or conflicts with their own professional or personal interests.
- We maintain processes and systems to ensure that Lundbeck’s books and records are accurate and sufficiently detailed.

You are expected to

- Observe and follow Lundbeck’s Code of Conduct.
- Introduce yourself to stakeholders* by name and state your relation to Lundbeck.
- Take due care that your interactions with stakeholders* have a professional purpose.
- Keep your communication objective and professional.
- Hire third parties* based on clearly identified, legitimate needs and objective selection criteria.
- Use Lundbeck’s standard contracts where possible, and challenge costs to obtain competitive market prices and payment conditions.
- Observe and follow Lundbeck’s publication policy and publication guideline.
- Never engage in any relationship that could create a conflict of interest* such as transactions involving yourself, a partner, a close relative or a company in which you have a business or ownership interest.
- Immediately notify your line manager, if you find yourself in a conflict of interest*.
- Follow Lundbeck procedures and local law for reporting, taxation and accounting.
- Never establish any undisclosed or unrecorded fund or asset or misleading or incomplete financial information.
- Adhere to Lundbeck procedures for authorisation and signing.

Stakeholders are any member of society that you interact with as part of your work such as healthcare professionals, patients and patient organisations, regulators, scientific and business partners.

Third parties are professionals and entities performing activities within Lundbeck’s core business areas either on behalf of or in the material interest of Lundbeck. The activities performed by third parties 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, manufacturing of Lundbeck medicinal products, market access activities, medical information or promotional activities, sales and marketing activities including distribution and public relations activities.

A conflict of interest is a situation in which the personal or private interests of an employee collide with, or seem to collide with, the interests of Lundbeck.
Fair and open competition

At Lundbeck, we are committed to the principle of fair, free and efficient competition. We work to ensure competition law compliance in order to preserve and protect free and open competition and avoid abusive behaviour that may restrain competition.

Lundbeck will ensure that

- We implement and maintain effective competition compliance policies and guidelines throughout our business.
- Relevant Lundbeck employees are trained to comply with competition law.
- We promote an understanding of and compliance with competition law throughout our value chain.

You are expected to

- Never restrain competition through agreements, arrangements or understandings that restrict competition.
- Bid for contracts and tenders independently from and without any agreement or arrangement with our competitors.
- Never exchange competitively sensitive information or engage in discussions that may lead to the co-ordination of competitive behaviour.
- Never share with competitors information about current or future pricing, or any information that might affect prices or pricing practices.
- Always involve Corporate Legal, if issues that may affect competition* are brought up by competitors, authorities, distributors, suppliers or third parties*.

Issues that may affect competition could be issues that affect price mechanisms, market shares or could create a monopoly or lead to abuse of a dominant market position. Topics that would require you to involve Corporate Legal include pricing policies, trading terms, pricing practices of distributors, marketing plans, profits, market shares, distribution practices, bids, production levels, boycotts, selection of customers, sales territories or cutting off.

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Anti-corruption

At Lundbeck, we believe that integrity and fair dealing should be reflected in all our activities, and we will work against corruption in any form. We do not accept corrupt activities, whether committed by our employees or by third parties* acting on our behalf.

Lundbeck will ensure that

- Systems and controls are in place to prevent fraud* against Lundbeck, any of our partners or government entities.
- Our employees and third parties* are familiar with and follow procedures to avoid bribery*.
- All incidents of fraud* are thoroughly investigated and appropriate disciplinary actions are taken.
- Business decisions taken by our own employees are not influenced by gifts or entertainment from business partners.

You are expected to

- Ensure that you do not engage directly or indirectly in fraud* against Lundbeck, any of our partners, or government entities.
- Ensure that you do not engage directly or indirectly in bribery*.
- Refuse to pay any bribes, including small amount bribes or facilitation payments*.
- If a bribe is demanded, refer to Lundbeck’s Code of Conduct and immediately report to your manager.
- Only accept gifts or other advantages of a token value from stakeholders*. Ask your line manager, if you are in doubt.

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Fraud generally means acting dishonestly or deceptively with the intention of obtaining an undue benefit, in order to avoid an obligation, to cause a loss to another party or to illegally remove funds.

Bribery means to offer, promise or give any undue advantage, directly or indirectly, to a public official or a business partner, to obtain or retain business or other improper business advantage. Bribery is illegal whether you offer or give an undue advantage, or whether you receive such an advantage or a promise yourself.

Facilitation payments are illegal, non-official, small value payments, gifts or fees paid to public officials to speed up the delivery of a routine task or services that are part of their duties e.g. a customs officer stamping a customs form. The payment is for a task or service that the giver is entitled to receive.

Stakeholders are any member of society that you interact with as part of your work such as healthcare professionals, patients and patient organisations, regulators, payers, scientific and business partners.
Interactions with healthcare professionals

At Lundbeck, we believe that interactions with healthcare professionals* have a profound and positive influence on the quality of patient treatment and the value of future research. We acknowledge that in certain situations it is legal and expected that we sponsor events* and pay related hospitality in accordance with industry codes of practice.

Lundbeck will ensure that

- Events* are compliant with the laws, regulations and industry standards of the Lundbeck entity arranging the event* as well as the applicable regulations of the country of any participating healthcare professional*.
- Events* and related hospitality are always provided with the intention of enhancing knowledge about our products or provide scientific or educational information.
- All expenses for events* and related hospitality are kept at a reasonable level.
- Events*, related hospitality or inexpensive informational materials are not used to inappropriately influence the healthcare professional*.
- Systems and procedures are in place to ensure all transfers of value to healthcare professionals are recorded, reported or disclosed according to applicable regulations and industry standards.

You are expected to

- Be able to document the legitimate need for and the professional purpose of all transfers of value to healthcare professionals.
- Ensure a written agreement is agreed in advance of the commencement of genuine consultancies or other relevant services, which specifies the nature of the services to be provided and the basis for payment of those services.
- Ensure that the compensation offered to healthcare professionals* speaking or presenting at an event* reflect the fair market value.
- Ensure that the decision to invite healthcare professionals* to international events* is based on professional or logistical arguments.
- If you sponsor a healthcare professional’s* participation in an event*, only pay travel, meals, accommodation and registration fees.
- Abstain from compensating participants for the time spent at events* or paying for expenses unrelated to events* or for any costs for spouses, family or other companions.
- Avoid organising or sponsoring entertainment, leisure or social activities as part of events*.
- Only offer inexpensive informational materials or other items with a professional value* for the recipient that are permitted by applicable regulations and industry standards.
- Ensure that all transfers of value to healthcare professionals are recorded, reported or disclosed according to Lundbeck procedures, applicable regulations and industry standards.

A healthcare professional is any member of the medical, pharmacy or nursing professions or any other person, who in the course of his or her professional activities may recommend, prescribe, purchase, supply or administer a medicinal product.

An item with a professional value is one that is relevant to the practice of the healthcare professional or beneficial to the provision of medical services or patient care. Small customary items may be given infrequently, even if they are not of professional value to the healthcare professional, only on an exceptional basis in acknowledgment of significant national, cultural or religious events, and only if such items are inexpensive and permitted under local laws and regulations.

Events are symposia, congresses and other promotional, scientific or professional meetings for healthcare professionals e.g. advisory board meetings or investigator meetings, which aims at providing scientific or educational information and/or informing healthcare professionals about products.
Donations

At Lundbeck, we occasionally provide donations* to confirm our responsibility towards local communities. We wish to ensure that such donations* aim to foster good will and are not provided to obtain business advantages.

Lundbeck will ensure that

- Donations* benefit patients, healthcare, research or take the form of modest charity to the local community.
- Donations* are provided without expectation of receiving any advantages in return.
- Donations* are made to institutions, organisations or associations, not to individual healthcare professionals*.
- Donations* are documented in an agreement that specifies the purpose.
- Financial support or other significant support to patient organisations are registered or disclosed according to local regulations.

You are expected to

- Never offer donations* with the expectation of receiving unjustified favours or other advantages in return.
- Document the purpose of the donation* and the amount of financial support or the form of significant non-financial support.
- Ensure that all donations* are approved, kept transparent as required by local regulations and recorded in our accounts.
- Ensure that donations* are used for the intended purpose by the recipient.

A donation is a voluntary gift given without return consideration or compensation. Donations may take many forms including money, services, second-hand inventory, knowledge sharing etc.

A healthcare professional is any member of the medical, pharmacy or nursing professions or any other person, who in the course of his or her professional activities may recommend, prescribe, purchase, supply or administer a medicinal product.
Confidential information and personal data

At Lundbeck, we understand the importance of protecting confidential information* and personal data*. We want to protect our assets and proprietary information, prevent the unauthorised disclosure of confidential information* and personal data*, prevent insider trading and safeguard the integrity of our patients, employees and partners.

Lundbeck will ensure that

- Security policies and procedures are in place to protect and prevent the unauthorised disclosure of confidential information* and personal data*.
- Awareness activities and training in how to handle confidential information* and personal data* are available to our employees.
- Tools and guidance, including standard contract templates, are in place to help employees protect confidential information* and personal data*.
- Systems and processes compliant with applicable stock exchange regulations are in place to prevent insider trading in securities.
- Our employees are familiar with applicable stock exchange regulations on insider trading.

You are expected to

- Consider whether information is confidential before disclosing it.
- Be responsible for the proper use and protection of confidential information*, including careful use of our IT systems.
- Never disclose proprietary or confidential information* to anyone outside Lundbeck without executing a secrecy agreement approved by Corporate Legal.
- Understand and comply with local laws and regulations relating to protection of personal data*.
- Ensure the necessary agreements are in place before, collecting, processing or transferring personal data* to third parties.
- Only collect, process, disclose or store personal data* if it has a legitimate business purpose.
- Delete personal data* in accordance with the Lundbeck Retention Guideline when there is no longer a legitimate business purpose.
- Never trade in Lundbeck shares or shares of another company based on inside information*.
- Never pass on inside information* to any other person or encourage anyone to trade based on inside information*.

Confidential information is sensitive or critical information e.g. price-sensitive information and trade secrets of which the unauthorised disclosure could cause damage to our interests or the interests of the party that the information pertains to.

Personal data is information, which identifies a particular individual including, but not limited to, name, personal address, phone numbers, e-mail addresses, performance appraisals and national identification numbers such as social security numbers and passport numbers. There are different categories of personal data, which result in different requirements relating to the collection, processing and transferring of personal data.

Inside information is information about Lundbeck or other companies with which we are doing business or negotiating that is not generally known to the public, but would likely, if known, affect the price of Lundbeck’s or another company’s shares or influence people’s decisions to invest in Lundbeck’s or another company’s shares.
Animal research

At Lundbeck, we are obliged to conduct experiments on animals to ensure patients receive safe and effective medicine. We provide appropriate care for our experimental animals, and we continuously work to improve our animal research policy and procedures as well as our animal facilities.

Lundbeck will ensure that

- Our animal research policy and procedures comply with applicable laws and guidelines, and are subjected to an ethical review on a regular basis.
- All employees working with animals uphold documented and appropriate training.
- Laboratory animal veterinary staff are on call and available to ensure animal welfare and appropriate treatment of ailments.
- Employees are acknowledged for initiatives that refine, replace and reduce the use of animals and for exceptional animal care.
- Contract research organisations and laboratories working on our behalf as well as suppliers of animals are closely audited and live up to our ethical standards.
- Trends within laboratory animal science are closely monitored, carefully evaluated and implemented when appropriate.
- Required data from animal research is collected and promptly reported to the relevant regulatory authority*.

You are expected to

- Be familiar with Lundbeck’s approach to animal research expressed in this Code of Conduct.
- Contact your manager or laboratory animal veterinary staff, if you have concerns regarding animal welfare.

When working with animals you shall

- Follow Lundbeck’s current policy and procedures for animal research.
- Ensure in dialogue with your manager that you have received the appropriate training.
- Ensure that any use of research animals is approved by a laboratory animal veterinarian and carried out in accordance with a formal research protocol, and the results are reported in writing.
- Work continuously to refine, replace and reduce the use of animals.

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* A regulatory authority is a government body responsible for the approval and surveillance of medicinal products.
Clinical research

At Lundbeck, we conduct clinical research activities in accordance with international guidelines, Good Clinical Practice (GCP) and ethical standards that meet international requirements. We provide the public with information about our clinical studies while they are ongoing and publicly disclose the results of these studies when they have been completed.

Lundbeck will ensure that

- Our clinical research activities are regulated through procedures complying with current international requirements and regulations.
- Our employees have been trained in relevant study procedures prior to being involved in clinical research.
- Investigators, contract research organisations and study sites are carefully selected, trained and audited to secure safe study conduct.
- Information on and the results of all interventional clinical phase II-IV trials are publicly disclosed regardless of the outcome and without omission of relevant data.
- Required clinical data* is collected and promptly reported to the relevant regulatory authority*.
- Participants in our trials are protected by the same basic rights, ethical standards and international regulations no matter where in the world the study is being conducted.
- We strive to conduct our clinical research in countries where we or our partners intend to market the product.
- Clinical assessments, post-marketing surveillance, experience programmes and post authorisation studies are conducted with a scientific purpose.

You are expected to

- Observe and follow Lundbeck's procedures for clinical research.
- Only engage in clinical trials, if it is part of your job and you are trained and authorised to do so.
- Avoid participation as a study subject or investigator in interventional clinical studies sponsored by Lundbeck.
- Always ensure that study subjects' rights, safety and integrity are protected.
- Observe and follow Lundbeck's procedures and any applicable local requirements for study subject data handling and protection.
- Observe and follow Lundbeck's clinical trial disclosure and publication policies for transparency of clinical research.

Clinical data is information on and the results of all interventional clinical phase I – IV trials.

A regulatory authority is a governmental body responsible for the approval and surveillance of medicinal products.
Promotional activities
At Lundbeck, we acknowledge that the promotion* of medicinal products is strictly regulated and monitored by authorities and we are committed to complying with applicable regulations.

Lundbeck will ensure that

- Our employees and third parties* that perform information or promotional activities are trained to comply with current laws and regulations and industry and Lundbeck standards on promotional activities.
- Corporate systems are in place to ensure that promotional activities provide current, fair, accurate, balanced, objective and sufficiently complete information on the product.
- Promotion* only takes place for products for which Lundbeck or a partner company holds a marketing authorisation* and only for indications within the label.
- Samples may only be provided to healthcare professionals* according to national regulation and industry standards.
- Our global strategy and procedures for use of our websites and other electronic media are established to secure that the regulatory requirements are not jeopardised.

You are expected to

- Never offer any undue or inappropriate benefits in exchange for prescribing, recommending, purchasing, supplying or administering medicinal products.
- Only use promotional material that has been subjected to a medical, regulatory and legal approval.
- Only use promotional materials that are updated, complete and clearly give references to the sources of information.
- Only carry out promotion* of products that have a valid marketing authorisation* in the country where you operate.
- Never engage in off-label* promotional activities.
- Only provide off-label* information upon request from a healthcare professional*, as a non-promotional activity and in accordance with applicable local laws, regulations and local Lundbeck procedures.
- Ensure that all samples provided to healthcare professionals* are controlled and can be accounted for.

The term promotion covers any activity undertaken, organised or sponsored by or on behalf of a pharmaceutical company, which promotes the prescription, supply, sale, administration, recommendation or consumption of its medicinal product(s). Also providing non-promotional information in a promotional context, e.g. presenting strictly scientific information or disease awareness at a promotional event, is promotion.

Third parties are professionals and entities performing activities within Lundbeck’s core business areas either on behalf of or in the material interest of Lundbeck. The activities performed by third parties 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, manufacturing of Lundbeck medicinal products, market access activities, medical information or promotional activities, sales and marketing activities including distribution and public relations activities.

A marketing authorisation is a licence issued by a regulatory authority. Such licence is required before any medicinal product can enter the market.

Off-label means the use of a medicinal product for an indication, in a dosage form, in a dose regimen, for a population, or other use parameter that is not mentioned in the labelling approved by the relevant regulatory authority.

A healthcare professional is any member of the medical, pharmacy or nursing professions or any other person, who in the course of his or her professional activities may recommend, prescribe, purchase, supply or administer a medicinal product.
The safety of our patients

At Lundbeck, we acknowledge our responsibility to people who depend on our products and knowledge to manage their disease. We produce high quality products, perform pharmacovigilance*, continuously evaluate the benefits and risks of our products and take proactive action as warranted.

Lundbeck will ensure that

- Our pharmacovigilance* systems are continuously developed to meet current international or national laws and regulations with regard to our medicinal products, clinical and animal research activities.
- We provide timely reports on adverse drug reactions and subsequently engage proactively in dialogue with the relevant regulatory authority* and other key stakeholders*.
- The required information to patients on the safe use of products for which Lundbeck holds the marketing authorisation* is traceable and kept up to date.
- Our global pharmacovigilance* service provides round the clock assistance to handle reported adverse events*.
- We maintain and develop a quality management system to control production risks, to continually improve our processes and to meet regulatory expectations to product quality.
- We work within our sphere of influence to combat counterfeit medicine* that threatens the health and well-being of our patients.

You are expected to

- Immediately forward any reports of adverse events* or special situations* on our medicinal products to the local Pharmacovigilance Manager or to the global Pharmacovigilance Division (safety@lundbeck.com).
- Report any product complaints and counterfeit or suspected counterfeit medicine* to the local Pharmacovigilance Manager or to the Lundbeck Qualified Person* in Supply Operations.

Pharmacovigilance staff worldwide shall

- Participate in mandatory training sessions and observe and follow internal procedures in relation to pharmacovigilance* activities.
- Collect, collate and evaluate adverse effect information and turn it into knowledge that can support decision-making and the safe use of our products.

Supply Operations staff worldwide shall

- Participate in mandatory training sessions and observe and follow internal procedures in relation to product quality.

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*Pharmacovigilance is the science and activities relating to the detection, assessment, understanding and prevention of adverse effects or any other medicine-related problem.

*Adverse events are any untoward medical occurrence of a medicinal product, which does not necessarily have a causal relationship with the treatment. An adverse event can therefore be any unfavourable and unintended sign, symptom or disease temporally associated with the use of a medicinal product, whether or not considered related to the medicinal product.

*Special situations include pregnancy, breast feeding, lack of effect, overdose, misuse, abuse, medication error, interaction, off label use and occupational exposure.

*A regulatory authority is a governmental body responsible for the approval and surveillance of medicinal products.

*Stakeholders are any member of society that you interact with as part of your work such as healthcare professionals, patients and patient organisations, regulators, payers, scientific and business partners.

*A marketing authorisation is a licence issued by a regulatory authority. Such licence is required before any medicinal product can enter the market.

*Counterfeit medicine is a product manufactured or sold with the intent to deceptively represent its origin, authenticity or effectiveness or a product that is deliberately and fraudulently mislabelled.

*A qualified person is typically a licensed pharmacist or similar with several years pharmaceutical manufacturing experience, responsible to certify that the quality of medicinal products complies with the marketing authorisation.
Human resources
At Lundbeck, we support diversity in our workforce and promote learning and development at an organisational, team and individual level. We believe that respect for the individual is the foundation of a high performing company. Our employees are therefore always engaged on a voluntary basis in decent and ethical employments.

Lundbeck will ensure that

- Our human resources (HR) policies and procedures comply with applicable laws and guidelines.
- Diversity among both our employees and managers is supported, valued and used as an asset in our innovative and learning environment.
- Respect for each employee’s integrity is maintained and that discrimination and harassment are never accepted.
- Each of our employees has the opportunity to develop the competencies that are necessary to achieve the expected results.
- Recruitment, acknowledgement and recognition are based entirely on personal abilities, performance, potential and behaviour.
- No unethical exploitation of employees takes places and that all employees are free to join groups for the promotion of their occupational interests.

You are expected to

- Be familiar and comply with Lundbeck’s HR approach as expressed in this Code of Conduct.
- Treat others with decency and show respect for differences, varying ideas and perspectives among your colleagues.
- Promote a positive and inclusive work environment that is free from discrimination and harassment.
- Take an active part in the development of your professional skills and competencies.
- Offer and ask for feedback to promote learning for yourself as well as for your colleagues.
- Challenge the status quo, make suggestions for change and be adaptive.
- Report concern to your immediate manager or your local HR manager about behaviour that does not comply with this Code of Conduct.
Health, safety and environment

At Lundbeck, we provide a sound working environment for our employees and we act responsibly to minimise our impact on the environment. We promote continuous improvements through cooperation between managers and employees with support from specialists who provide knowledge and effective solutions. We report openly on our performance.

Lundbeck will ensure that

- Our health, safety and environment (HSE) policy, strategy and procedures as a minimum comply with applicable laws and regulations.
- Our employees have the working conditions and knowledge that are required to carry out their jobs in a healthy and safe manner, and to minimise the impacts on the environment.
- HSE considerations are made systematically when establishing new facilities and developing new products and processes.
- Results of regular surveys on the physical and psychological working conditions are used to define health & safety activities.
- Challenges and successes in handling HSE issues are communicated actively to inspire and share experiences among our employees and other stakeholders*.

You are expected to

- Participate in training activities to understand your part in fulfilling Lundbeck’s HSE policy.
- Understand and follow Lundbeck’s requirements to effectively manage the significant HSE aspects related to your job.
- Conduct yourself in a safe and prudent manner.
- Actively participate in surveys and support solutions to improve the physical and psychological working conditions.
- Take an active part in protecting the environment by minimising consumption of energy, water and other resources.
- Immediately inform your manager about any actual or potential HSE concerns.

*Stakeholders are any member of society that you interact with as part of your work such as healthcare professionals, patients and patient organisations, regulators, payers, scientific and business partners.
Supplier evaluation
At Lundbeck, we aim to mitigate the risks of insufficient management of material issues in our supply chain. Our supplier evaluation process is based on internationally agreed conventions and principles within human and labour rights, the environment and anti-corruption. This helps us to balance commercial, quality, labour and environmental aspects when evaluating our suppliers.

Lundbeck will ensure that
- Our suppliers are subjected to a systematic and risk-based evaluation process that complies with applicable laws, regulation and guidelines.
- We pay special attention to high risk suppliers to successfully manage our supply chain.
- Employees working with suppliers receive sufficient training for conducting supplier evaluation.
- Appropriate tools are available for employees working with suppliers.
- We communicate our expectations to our suppliers including their responsibility for vouching for their suppliers.
- We have an open dialogue with our suppliers to help them improve their performance to meet our requirements.
- We engage with stakeholders* to continuously improve our supplier evaluation processes.

You are expected to
- Be familiar with Lundbeck's approach to suppliers as expressed in this Code of Conduct.
- Use suppliers approved by Lundbeck when possible.

When working with suppliers you shall
- Ensure in dialogue with your manager that you have the appropriate training for evaluating suppliers.
- Base selection of suppliers on the criteria defined in Lundbeck’s supplier evaluation process.
- Ensure an open dialogue with suppliers to create trust and continuously improve their performance.
- Monitor the performance of the suppliers you are responsible for.
- Report any actual or potential deviation from Lundbeck’s supplier evaluation process to your manager.

Stakeholders are any member of society that you interact with as part of your work such as healthcare professionals, patients and patient organisations, regulators, payers, scientific and business partners.