

Partner Code of Conduct

Purpose & Scope

At the Novo Nordisk Foundation (NNF), we make sure we uphold the highest ethical standards in our conduct, just as a leading global philanthropic foundation should.



Why have a Partner Code of Conduct?

Our Board of Directors approved this Code of Conduct to guide ethical decision-making.



Who is this Partner Code of Conduct for?

This Code of Conduct applies to people and organisations associated with NNF ('you/your'), including:

- grant recipients;
- personnel funded by NNF grants;
- members of NNF committees;
- individuals, institutions, and organisations collaborating with us;
- consultants, suppliers, and vendors;
- subsidiaries wholly owned by NNF and their employees, executive management, and boards; and
- other individuals or organisations on a case-by-case basis.

Following this Code of Conduct is part of NNF's General Terms & Conditions for grants

Your Role



Individuals

- Read this Code of Conduct and apply its principles in your daily work and interactions with NNF.
- Share NNF's ethics and compliance standards, as well as expected behaviours, with colleagues, third parties, and external stakeholders.
- Speak up and report any possible or actual violations of this Code of Conduct.
- Involve NNF as soon as possible if unsure how to solve ethics and compliance issues.



Organisations

- Ensure your policies and procedures comply with this Code of Conduct.
- Ensure employees engaged in NNF-related activities understand this Code of Conduct and know how to report any concerns, both within your organisation and to NNF.
- Advise employees on how to adopt an ethical mindset and incorporate ethical principles into their work. Lead by example.
- Promote a 'speak up' culture where employees are encouraged to voice and handle concerns around ethics and compliance. Make sure there is an easy-to-follow policy for supporting whistleblowers, containing safeguards to prevent reprisal.

Our Principles



Novo Nordisk Foundation Partners model ethical behaviour, act with integrity, and make responsible use of NNF funds.

1. Fraud, embezzlement, and misuse of funds

Where we stand

We don't tolerate fraud, embezzlement, or misuse of NNF resources, including grants.

Your responsibilities

Report any suspicions or allegations of impropriety to NNF.

2. Conflicts of interest

Where we stand

We expect you to act in NNF's best interests and avoid conflicts of interest. Your personal interests should never have (or appear to have) undue influence on your professional judgment. We don't tolerate nepotism or any kind of preferential treatment of family, friends, or other close relations.

Your responsibilities

- Disclose any potential conflicts of interest to us; and
- manage any conflicts appropriately.

3. Corruption and bribery

Where we stand

We have a zero-tolerance policy on corruption and bribery in all forms, including facilitation payments.

Your responsibilities

When carrying out activities related to NNF, never accept, give, or promise gifts, hospitality, or anything of value that could:

- raise concerns about your integrity and ours; or
- be seen as trying to influence decisions or business judgment.

4. Sanctions, export controls, anti-money laundering, and counter terrorism

Your responsibilities

- Follow all applicable laws and regulations on:
 - sanctions;
 - export controls;
 - anti-money laundering; and
 - counter-terrorism; and
- when appropriate, perform due diligence to ensure your partners and any other third-parties don't knowingly or unwittingly support financial crime or unauthorised knowledge transfer.

5. Anti-trust, fair competition, and insider trading

Your responsibilities

- Follow all applicable laws and regulations on anti-trust and fair competition; and
- don't engage in, or tolerate, insider trading.

6. Data protection

Your responsibilities

Make sure any personal data and confidential information you collect, process, or store are dealt with as required by applicable laws and regulations.

When the European Union's General Data Protection Regulation (GDPR) applies:

- tell data subjects why you are collecting data and how you will process it;
- obtain clear and documented consent for collecting and processing data (when necessary);
- store data securely;
- keep data only as long as necessary; and
- use data only for specific and legitimate business purposes.

7. Due diligence on third parties

Your responsibilities

Before engaging with a third party to carry out NNF-related activities, check that the third party can comply with:

- applicable laws and regulations; and
- this Code of Conduct.

8. Humanitarian initiatives

Your responsibilities

If implementing NNF-supported initiatives in response to humanitarian crises, conflicts, or disasters, follow the United Nations' principles of humanity, neutrality, impartiality, and independence. These principles are set out in UN General Assembly Resolutions [46/182](#) and [58/114](#).

“ *Novo Nordisk Foundation Partners foster and maintain welcoming, respectful, and safe workplaces.* ”

9. Labour practices

Your responsibilities

Uphold high standards in labour practices by:

- providing fair and reasonable remuneration;
- maintaining safe and healthy working environments; and
- following all applicable labour laws, regulations, and collective agreements.

10. Diversity and inclusion

Where we stand

With our grants, we aim to support inclusive environments with equal opportunities for employment and development.

Your responsibilities

When working with us:

- don't engage in unlawful discrimination of any kind;
- proactively support diversity and inclusion; and
- maintain workforce diversity and inclusive work environments.

11. Positive work environment

Where we stand

We don't tolerate discrimination, harassment, bullying, or offensive or demeaning behaviour, regardless of context.

Your responsibilities

- Put in place effective rules, policies, and procedures to:
 - address discrimination, harassment, bullying, and offensive behaviour; and
 - foster and maintain a positive workplace environment based on respect for each other's integrity, dignity, and privacy;
- take all reasonable steps to prevent any kind of poor behaviour in the workplace;
- respond appropriately when any reports arise; and
- have a zero-tolerance policy toward sexual exploitation, abuse, and harassment.

12. Safety and security

Your responsibilities

Provide a safe and secure work environment by:

- following all applicable health, security, safety, and environmental laws and regulations;
- obtaining necessary permits and approvals; and
- making appropriate checks to protect safety and security.

“ *Novo Nordisk Foundation Partners who engage in research live up to recognised standards for good research practice.* ”

13. Standards for good research practice

Your responsibilities

If you receive an NNF research grant, you must comply with:

- widely recognised standards for good research practice, including:
 - the rules of the host institution;
 - all applicable laws and regulations in the country where the grant is used; and
 - the following codes of conduct, as applicable:

Research Location	Relevant Code of Conduct
Denmark	Danish Code of Conduct for Research Integrity issued by Denmark’s Ministry of Higher Education and Science
Other European countries	European Code of Conduct for Research Integrity issued by the European Federation of Academies of Sciences and Humanities (ALLEA)
All other countries	Any similar national or regional code of conduct.

- international and national standards on:
 - animal welfare; and
 - safety and rights of clinical trial patients and healthy volunteers, such as:
 - the Nuremberg Code;
 - the [Declaration of Helsinki](#); or
 - other ethical guidelines; and
 - agreements on genetic resources, such as the [Nagoya Protocol on Access and Benefit-sharing](#).

In addition, if you are carrying out research in lower-income settings, you are encouraged to comply with the principles of the [TRUST Code](#).

14. Shared knowledge and open access

Where we stand

We believe that openly sharing research results is fundamental to advance science and address global challenges.

What we expect

We expect data and results fully or partially funded by NNF to be shared through open access publications when relevant and possible. We encourage all our partners to follow the [FAIR Guiding Principles](#) for Scientific Data Management and Stewardship for digital assets.

15. Research misconduct

Your responsibilities

You will report any academic or scientific misconduct:

- to the host institution and/or to us, if it's alleged or suspected; or
- to us, if it's confirmed by a host institution or relevant authority.

Suspension of grants

We may choose to put grants on hold while a misconduct inquiry is ongoing.

Reporting Code of Conduct Concerns



Don't be afraid to ask!

Ask for help if you are unsure whether a decision or action you are considering follows this Code of Conduct.

How to report a violation

Report any alleged or suspected breaches of the Code of Conduct:



directly to your usual contacts at NNF;



to the responsible NNF team, for instance;

- the Program Area;
- Grant Management; or
- other Functional Areas, such as Finance or Legal;



to Compliance, by email at nnfcompliance@novo.dk; or



via our confidential external [whistleblower website](#), linked at the bottom of the NNF homepage.



How we handle violations

We may either:



refer the case to the Partner organisation and expect to be informed of the outcome if:

- the violation occurs within the organisation; and
- the organisation has well-defined internal procedures for this kind of allegations, such as those at a large university or NGO;

or



at our discretion, investigate or act on the matter directly.

In all cases, we reserve the right to:

- carry out an independent audit of any Partner for NNF-related activities; or
- refer certain violations of the Code of Conduct to law enforcement authorities for investigation or prosecution.



Our disciplinary sanctions

No matter how the investigation is conducted, we may impose disciplinary sanctions for violating the Code of Conduct. Our sanctions include:

- a letter of reprimand;
- informing relevant stakeholders about the breach;
- declining to engage in future partnerships;
- refusing to accept future grant applications;
- reducing, phasing out, or terminating a partnership or grant; and
- demanding repayment of funds or a grant.