

Corporate Global Supplier Code of Conduct Policy

Introduction

Genmab is focused on the creation and development of innovative and differentiated antibody products, with the aim of improving the lives of cancer patients. At Genmab we seek to establish relationships with business partners, suppliers, vendors, and other third parties (collectively referred to as "Suppliers") that provide the best overall quality and value and that demonstrate our shared commitment to ethical and responsible business practices. Consequently, for its Suppliers, Genmab has established certain standards that include ethical business practices and regulatory compliance. Genmab expects its Suppliers will embrace the commitments included in this Supplier Code of Conduct.

Applicability

As a Genmab Supplier, you and your employees, personnel, agents, and subcontractors agree to respect and fully adhere to this Supplier Code of Conduct and to act in a way that is consistent with our values of Genmab's Code of Conduct in all dealings with and/or on behalf of Genmab globally.

1. LEGAL COMPLIANCE

All Suppliers of Genmab must conduct their business activities in full compliance with all applicable laws and regulations while conducting business with and/or on behalf of Genmab, and must, without limitation, meet the following requirements:

Anti-Corruption & Bribery

- To comply with all applicable laws, regulations, and international standards, including but not limited to the U.S. Foreign Corrupt Practices Act (FCPA) and any other anti-corruption, anti-bribery, and anti-money laundering laws that govern the jurisdictions in which Genmab or Suppliers conduct business.
- To refrain from engaging in any and all forms of bribery, corruption, extortion, and embezzlement.
- To conduct all business dealings transparently performed and accurately reflected in Supplier's business books and records.
- To refrain from directly or indirectly making any promise, authorization, offer, or payment of anything of value (including but not limited to gifts, travel, hospitality, charitable donations, or employment) to any government official or other party to (1) improperly influence any act or decision of such official for the purpose of promoting the business interests of Genmab in any respect, or (2) to otherwise improperly promote the business interests of Genmab in any respect.
- To maintain appropriate compliance monitoring, record keeping and enforcement procedures.
- To use reasonable efforts to promote compliance with this Supplier Code of Conduct among your employees (including permanent, temporary, subcontractors, agents, etc.) and sub-suppliers.

- To maintain adequate procedures for a/ preventing any of your employees, suppliers, agents or other business partners from undertaking any conduct that in any way would give rise to an offense under applicable anti-corruption laws, rules and regulations and also b/ for detecting such conduct.

Privacy

- To comply with all applicable laws and regulations as to the processing of personal data when obtaining, using, accessing, or processing personal data received from or on behalf of Genmab.
- To ensure that any personal data received from or processed on behalf of Genmab is adequately and securely protected both physically and electronically at all times.
- To immediately report any potential privacy or security breaches/vulnerabilities to Genmab.

Fair Competition and Antitrust

- To conduct business in full compliance with applicable antitrust and fair competition laws that govern the jurisdictions in which the supplier conducts business.

Trade Compliance

- To comply with all international laws, national laws, regulations, and other controls which govern the access, transfer, import and export of products, services, and technology.
- To maintain, where applicable, a mature and comprehensive compliance programs and maintain policies to manage technologies, products, and technical data that is controlled or restricted by applicable law.
- To not provide to Genmab any controlled technologies, products, or technical data, without providing notice of such controls as necessary for Genmab to maintain compliance with applicable laws.

Insider Trading

- To avoid any form of insider trading in Genmab A/S or any another company's listed securities when in possession of information about Genmab or any another company that is (1) not available in the public domain, and (2) could potentially influence an investor's decision to buy or sell the security.

2. CONFLICT OF INTEREST

- To avoid any conflicts of interest as well as any appearance of a conflict of interest.
- To disclose to Genmab in a timely manner actual or potential conflicts of interest relating to their activities as a Genmab Supplier.

3. LABOR PRACTICES AND HUMAN RIGHTS

Human & Labor Rights

- To ensure compliance with all international and local human and labor laws in countries where Genmab and Supplier are established or have business operations in.
- To prohibit any form of child labor and to not employ anyone under the age for completing compulsory education, or under the legal minimum working age for employment.

- To provide fair remuneration to its employees and to observe applicable national statutory minimum wages and other entitlements.
- To comply with the maximum number of working hours in accordance with applicable laws and regulations.
- To recognize, as far as legally possible, the right of free association of employees and to neither favor nor discriminate against members of employee organizations or trade unions.
- To provide for a workplace free of harassment, unlawful discrimination, and retaliation.

Health & Safety

- To provide a safe and healthy working environment.
- To control hazards and take the reasonable precautionary measures against accidents and occupational diseases.

Diversity

- To promote equal opportunities for and not to tolerate any harassment or discrimination of your employees irrespective of skin color, race, nationality, social background, disabilities, sexual orientation, gender identification, political or religious conviction, sex, age, marital status or pregnancy status.

4. ENVIRONMENT & PERMITS

Environment

- To comply with all applicable environmental laws and regulations, including but not limited to, laws and regulations that regulate hazardous materials, air and water emissions and wastes.
- To minimize environmental pollution and make continuous improvements in environmental protection.

Waste

- To consider environmental impact in the entire supply chain through conserving resources, minimizing waste and maximizing local sourcing.

Permits & Registrations

- To obtain, maintain, comply with and keep current all required environmental permits and registrations.
- To minimize in manufacturing operations, adverse effects on the community, environment and natural resources while safeguarding the health and safety of the public.

5. SUPPLY CHAIN & ANIMAL WELFARE

Sub-suppliers & Sub-contractors

- To use reasonable efforts to promote compliance with this Supplier Code of Conduct among your suppliers and subcontractors.
- To obtain written consent from Genmab prior to engaging a subcontractor to fulfill Supplier's obligations to Genmab for meeting any obligations contained in any agreement a Supplier may have with Genmab.

Conflict Minerals

- To ensure that any delivery of goods to Genmab will at no time contain any “conflict minerals,” as defined under applicable law and regulation.

Animal Welfare

- To only conduct animal testing in accordance with scientifically valid protocols which must meet all study and regulatory requirements, and to conduct tests only in accordance with all applicable laws and regulations.
- To treat animals involved with testing humanely, with pain and stress minimized.
- To use alternatives wherever scientifically valid and acceptable to regulators.

6. PROTECTING INFORMATION & INTELLECTUAL PROPERTY, SECURITY**Protecting information**

- To ensure the confidentiality of any information provided by Genmab, only disclose such information.
- in accordance with applicable law, regulations and upon written approval from Genmab.

Communication

- To only speak to the press on behalf of Genmab if expressly pre-authorized in writing to do so by an authorized Genmab communications representative.
- Not to issue any press releases or other publicity relating to Genmab without the prior written consent of Genmab.

Intellectual Property

- To conduct all activities and engagements in a manner that protects Genmab intellectual property rights while also properly respecting others’ intellectual property.

Physical and Digital Security

- To have in place adequate and appropriate physical and digital security measures to ensure that information provided by Genmab is not corrupted, copied, stolen, disclosed, misused or accessible to anyone without proper authorization and approval.

7. PRODUCT COMPLIANCE AND QUALITY, BUSINESS AND PRODUCT INFORMATION**Product Compliance and Quality**

- To ensure that all products provided to Genmab are developed according and conform to applicable quality standards and procedures.
- To monitor and report any counterfeit or suspected counterfeit products.

Business and Product Information

- To provide all business or product information and reporting activities honestly and accurately and to comply with all applicable laws regarding their completion and accuracy.
- To promptly provide any requested information relating to the supplied products.

8. REPORTING CONCERNS

To report questionable behavior or any possible violation of the Supplier Code of Conduct directly to Genmab:

1. Email [Genmab Procurement](#); or
2. Go to the [Genmab Speak Up Policy](#); or
3. Report the matter to Genmab through the web portal at GenmabSpeakUp.ethicspoint.com

Suppliers are encouraged to work with their primary Genmab contact in resolving their concern, but if that is not possible or appropriate, they may refer to the options above.