

## Global Speak Up Policy

### 1. WHAT IS THE PURPOSE AND SCOPE OF THIS POLICY?

Genmab is committed to conducting all aspects of its business honestly, with integrity, and in accordance with its values and standards of expected behavior as outlined in Genmab's Code of Conduct ("Code").

The purpose of this policy, as approved by the Genmab A/S Board of Directors, is to:

- Encourage people to use the Genmab Speak Up hotline if they become aware of Potential Misconduct, defined below to include suspected violations of laws, regulations, or Genmab's Code or other standards;
- Explain how to Speak Up and what protection a discloser will receive;
- Outline Genmab's processes for responding to Speak Up reports; and
- Promote a workplace environment in which everyone feels safe, supported and encouraged to Speak Up.

This Policy sets standards for Speaking Up globally and applies to all Genmab company and entity personnel, inclusive of members of the Genmab Board of Directors, management, employees and contingent staff regardless of work location. Genmab takes Speaking Up seriously. Genmab will not tolerate anyone being discouraged from Speaking Up or being subject to detriment or retaliation because they want to Speak Up or they have done so. Disciplinary action, up to and including termination of employment or engagement, may be imposed upon anyone shown to have retaliated against or caused harm or detriment to a person in connection with Speaking Up.

### 2. WHAT IS SPEAKING UP?

Anyone with information about Potential Misconduct is encouraged to report that information to an appropriate authorized Genmab Report Recipient as detailed in Section 5 (i.e. to "Speak Up"). If in doubt, Speak Up.

### 3. WHAT IS POTENTIAL MISCONDUCT?

**Potential Misconduct** is any suspected or actual misconduct or improper state of affairs or circumstances, including violations of laws, regulations, Genmab's Code or standards, in relation to any Genmab company or entity, its Board of Directors, or an employee, officer, consultant or contractor of Genmab. You should Speak Up even if you are unsure if something is Potential Misconduct. Information about Potential Misconduct should be raised with a Recipient to allow the issues to be effectively resolved.

Potential Misconduct does not generally include **personal work-related grievances**. Personal work-related grievances relating to your employment that have implications for you personally (such as a personal quarrel or disagreement between you and another employee or a decision about your bonus or a potential promotion) fall outside the scope of the Genmab Speak Up hotline. Generally, these types of personal grievances should be raised with your local HR representative or a Recipient to allow the issues to be resolved most effectively. In some cases,

these grievances may also include or be related to another matter that qualifies as reportable Potential Misconduct.

Examples of Potential Misconduct include, but are not limited to, the following:

- Breach of applicable law or regulation;
- Breach of the Code, or its policies, procedures, or standards;
- Criminal activity;
- Bribery or corruption;
- Conduct endangering health and/or safety, or causing damage to the environment;
- Financial fraud or mismanagement;
- Conduct likely to damage Genmab's financial position;
- Conduct that represents a danger to the public or to the financial system;
- Dishonest or unethical behavior or business practices;
- Victimization or harassment;
- Insider trading;
- Deliberate release of non-authorized possession of proprietary or private data;
- Conduct likely to damage Genmab's brand, assets, reputation or relationships with others (for example, customers, patients, business partners, Governments and/or regulators);
- Unauthorized use of Genmab's confidential or proprietary information or data;
- Non-disclosure of a material site, cyber, other security breach;
- Retaliating against or causing detriment to a person who Speaks Up; and/or
- Deliberate concealment or facilitation of any of the above

Conversely, examples of personal work-related grievances, which are generally outside the scope of Potential Misconduct under this Policy may include, but are not limited to:

- Disagreements between employees/ staff;
- Disagreements between staff and management;
- Decisions about promotions; and
- Decisions about remuneration, bonus, reward structures.

#### 4. WHO SHOULD SPEAK UP?

Anyone with information about Potential Misconduct is encouraged to Speak Up. This includes all of Genmab's current and past employees, directors, contractors, customers, suppliers and other associated third parties wishing to report concerns relevant to Genmab or its business activities.

#### 5. WHO SHOULD I TELL?

Genmab encourages you to Speak Up to any of the following Recipients:

**Non-Employees/ Non-Staff of Genmab:**

- Visit [GenmabSpeakUp.ethicspoint.com](https://GenmabSpeakUp.ethicspoint.com)

**Employees/ Staff/ Directors of Genmab:** Submit your report by email, telephone or in person:

- Visit [GenmabSpeakUp.ethicspoint.com](https://genmabspeakup.ethicspoint.com) or telephone:
  - o Denmark: 80-83-01-69
  - o Netherlands: 0800-020-1556
  - o U.S.: 1-844-942-3289
  - o Japan: 0800-123-0136
- Contact an individual member of the Genmab Compliance Department:  
<https://microsoftgenmab.sharepoint.com/sites/Compliance>
- Contact Compliance Department at: [compliance@genmab.com](mailto:compliance@genmab.com)
- HR-related matters: Contact local HR Business Partner

\*This Genmab Speak Up Hotline is an independently- operated hotline service available globally that gives employees, staff, and other individuals the opportunity to report Potential Misconduct either online or via telephone call. Reports may be made anonymously, if permitted in the relevant jurisdiction.

## 6. WHAT INFORMATION SHOULD I PROVIDE?

You should provide as much information as possible, including details of the Potential Misconduct reported, people involved, dates, locations and if any more evidence may exist. Providing robust information regarding the Potential Misconduct can facilitate effective investigation and potentially resolution of the relevant concerns.

When Speaking Up, you will be expected to have reasonable grounds to believe the information you are disclosing is true, but you will not be penalized even if the information turns out to be incorrect. However, you must not make a report that you know is not true or is false or misleading- such reporting may indeed lead to consequences for the reporter. If unsure whether to report a concern based on information available to you, you should first consult a member of the Genmab Compliance Department at: [compliance@genmab.com](mailto:compliance@genmab.com).

Speaking Up is a serious undertaking that may damage the career prospects and reputation of people who are the subject of serious allegations. Speaking Up is not about airing a grievance. It is about reporting real or perceived misconduct, malpractice, breaches of Genmab policies or the law.

## 7. CAN I MAKE AN ANONYMOUS REPORT?

Genmab encourages the reporting of Potential Misconduct, however we appreciate that Speaking Up can be difficult.

You can make an anonymous report if you do not want to reveal your identity (subject to the laws in some countries that may limit anonymous reporting). However, in certain cases, providing your name may make it easier to fully investigate and address your report and to offer you responsive feedback and support.

If you choose however not to provide your name, any investigation will still be conducted to the extent feasible under the circumstances.

If you do provide your name, it will be disclosed if you provide your consent, or in exceptional circumstances where disclosure is allowed or required by law (e.g. in certain dealings with a government regulator). If you have concerns about this, you can discuss this with the Recipient.

## **8. HOW WILL GENMAB RESPOND TO A REPORT?**

All reports made under this Policy will be received and treated sensitively and seriously, and will be dealt with promptly, fairly and objectively.

- Genmab provides the protections described at section 9 below when responding to or investigating reports.
- Genmab's response to a report will depend on the nature of the report and the information provided. Your report may be addressed and resolved through formal investigation or through a non-investigative process, such as assisting employees through coaching, mentoring and/or monitoring.
- All reports will be assessed and considered by Genmab and a decision made as to whether they should be investigated. Speaking Up does not guarantee a formal investigation in every case, and if you consent to Genmab contacting you, Genmab will let you know how it responds to your report, including whether an investigation will be/has been conducted. Note that this may not occur until after an investigation has been initiated or conducted.
- Any investigations commenced will be conducted in a timely manner and will be fair and independent from any persons to whom the report relates.
- All personnel must cooperate fully with any Genmab-directed or -led investigations.
- Unless there are confidentiality or other reasons not to do so, persons to whom the report relates will be informed of the allegation at an appropriate time and will be given a chance to respond to the allegations made against them.
- Genmab is developing appropriate escalation procedures in place to deal with circumstances where the Potential Misconduct involves a danger to public health, senior management, a director or significant financial matters.

Genmab is committed to protecting the well-being of all its employees. If you have not Spoken Up but would like additional support in relation to responding to an investigation or allegation, please contact your local HR representative.

## **9. WHAT PROTECTIONS EXIST IF I SPEAK UP UNDER THE POLICY?**

### **9.1 Protecting Your Identity**

Genmab will protect the identity of people who Speak Up as appropriate and consistent with applicable law. Your identity (and any information Genmab has as a result of your report that might be used to ascertain your identity) will only be disclosed if you give your consent to Genmab to disclose that information or in an exceptional circumstance where disclosure is allowed or required by law.

### **9.2 Protecting You from Retaliation and Detriment**

No person may cause detriment to another (or threaten to do so) because of a belief that

the person has or will Speak Up. Examples of detriment include retaliation, discrimination, harassment, causing physical or psychological harm, isolation, impact to an employee's performance and/or compensation, damaging property, or varying an employee's role or duties.

You should tell a Recipient listed in section 5 if you or someone else is being, or has been, subjected to retaliation of any kind in connection with Speaking Up. Genmab will treat this very seriously. Any person involved in such retaliatory conduct will be subject to disciplinary action and, in some circumstances, this may also be a criminal offence.

### **9.3 Other Protections Available**

Genmab is committed to making sure that you are treated fairly and do not suffer retaliation or detriment because you Speak Up. The protections offered will depend on variables such as the Potential Misconduct and people involved. Protections may include the following:

- Monitoring and managing the behavior of other employees;
- Relocating employees (which may include the people alleged to have been involved in Potential Misconduct) to a different division, group of office;
- Offering you a leave of absence or flexible workplace arrangements while a matter is investigated;
- Rectifying any detriment you have suffered consisted with applicable law.

Genmab will look for ways to support all people who Speak Up, but it will of course not be able to provide non-employees with the same type and level of support that it provides to employees. In all cases, Genmab will seek to offer appropriate support as practicable and consistent with applicable law.

## **10. REPORTING**

The Genmab A/S Audit and Finance Committee of the Board of Directors will on an annual basis receive a summary of all reports made under this Policy together with additional information about any material incidents raised. Individual reports may be escalated to the Genmab A/S Board of Directors at any time as appropriate.

## **11. FURTHER INFORMATION**

Any questions about this Policy or Speaking Up can be referred to the Genmab Compliance Department at: [compliance@genmab.com](mailto:compliance@genmab.com).

This Policy will be posted on Genmab's public website and on the Genmab's EverYday intranet site. This Policy does not form part of terms of employment and may be amended from time to time. While this Policy will be implemented across all Genmab companies, the principles of this Policy must be read in conjunction with and subject to the laws and regulations in the local environment in which each Genmab company operates.

**Supersedes May 6, 2020 Whistleblower Policy and Guidelines**

**Approved by the Board of Directors April 13, 2021**