


UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

FORM SD

Specialized Disclosure Report

NOVO NORDISK A/S

(Exact name of the registrant as specified in its charter)

The Kingdom of Denmark (State or other jurisdiction of Incorporation or organization)	333-82318 (Commission File Number)	N/A (IRS Employer Identification No.)
Novo Allé, DK-2880 Bagsværd, Denmark (Address of principal executive offices)		N/A (Zip code)
Karsten Munk Knudsen	+45 4444 8888	

(Name and telephone number, including area code, of the
person to contact in connection with this report.)

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2021.

M.H.

SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

Date: 31 May, 2022.

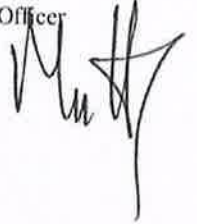
NOVO NORDISK A/S



By: /s/ Karsten Munk Knudsen

Name: Karsten Munk Knudsen

Title: Executive Vice President & Chief Financial Officer



3. We review those responses to determine whether there are facts, circumstances or red flags of any kind that could give reason to question a supplier's response or certification, or that otherwise merits a more detailed due diligence process.
4. To the extent necessary we make additional inquiries or perform additional reviews in order to resolve any such facts, circumstances or red flags.

Due Diligence

Novo Nordisk designed its due diligence measures to conform to the Organisation for Economic Co-operation and Development ("OECD") Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition.

Novo Nordisk's RCOI was executed with our suppliers and potential suppliers of conflict minerals. Queries to Novo Nordisk's suppliers and potential suppliers of conflict minerals in the course of that RCOI identified 47 unique smelters consistent with the smelter definitions agreed upon by industry and the audit protocols published by the Responsible Minerals Initiative that had sourced (or possibly sourced) conflict minerals from Covered Countries. However, our suppliers have certified to us that each of these smelters are recognized by the Responsible Minerals Initiative as "conformant" and are listed on the RMI's website as having successfully completed an RMAP audit demonstrating compliance with the relevant RMAP assessment protocol or an equivalent cross-recognized assessment.

Additional Risk Factors

The statements above are based on the RCOI process and due diligence performed in good faith by Novo Nordisk. These statements are based on the infrastructure and information available at the time. A number of factors could introduce errors or otherwise affect our conclusions regarding conflict minerals.

These factors include, but are not limited to, gaps in supplier data, gaps in smelter data, errors or omissions by suppliers, errors or omissions by smelters, confusion by suppliers over requirements of SEC final rules, gaps in supplier education and knowledge, timeliness of data, public information not discovered during a reasonable search, errors in public data, language barriers and translation, oversights or errors in conflict free smelter audits, Covered Country sourced materials being declared secondary materials, illegally tagged Covered Country conflict minerals being introduced into the supply chain, certification programs not being equally advanced for all industry segments and metals and smuggling of Covered Country conflict minerals to countries beyond the Covered Countries.

This Conflict Minerals Report is available on the Company's website at: <https://www.novonordisk.com/sustainable-business/performance-on-tbl/more-about-how-we-work-and-report/transparency-disclosures.html>. Information on the Company's website does not constitute a part of this Form SD.

MuH