

NOVO NORDISK LTD Member of the public including patients and journalists Methodological Note

Introduction

This Methodological Note is intended to serve as supporting documentation for the Novo Nordisk disclosure report on Transfers of Value (ToV) to Members of the Public including patients and journalists, in accordance with the Association of the British Pharmaceutical Industry (ABPI) Code of Practice.

Novo Nordisk Ltd will fulfil the obligation of the ABPI Code of Practice to be able to demonstrate that its disclosures were accurate at the time they were made in the event of a complaint and be able to respond to requests from the Recipient or the relevant authorities. Novo Nordisk Ltd shall document all direct and indirect ToV required to be disclosed and maintain the relevant Records of the disclosures made under these Codes for a minimum of five years after the end of the relevant Reporting Period.

The disclosures will be made on the website of Novo Nordisk Ltd: www.novonordisk.co.uk

What the Member of Public report outlines

- Total number of members of the public, including patients and journalists who provided contracted services to Novo Nordisk
- The total amount paid for the services, and related expenses and fees
- A description of the type of services provided

Terminology and Definitions

The terminologies below reflect Novo Nordisk's approach and explanation of how the disclosure requirements have been applied in a Novo Nordisk context.

Terminology	Novo Nordisk approach
Activities within the scope of disclosure for Members of the Public including patients and journalists	Service and consultancy fees Any ToV related to service and consultancy are included within the scope of the disclosure and published as contracted services. Such ToV include, for example, a meeting or event where a Member of the Public, including patients and journalists appears as a speaker, advisor, trainer, or consultant. These include: - Fees (fees for services such as preparation time, rehearsal time, travel time, and time expended on the activity) - Related costs (e.g., travel and accommodation expenses)

	The arrangements that cover consultancy or other services have a written contract, the service is agreed in advance of the commencement of the services which specifies the nature of the services to be provided and the basis for payment of those services.
Cross-border Payments	Novo Nordisk defines cross-border ToV as a transfer of value to a Member of the Public, including patients and journalists where the Novo Nordisk Affiliate providing the ToV is based outside of the country of the benefitting individual. These ToVs are disclosed in the country where the individual resides.
Disclosure Currency	Disclosure currency is the local currency of the Novo Nordisk Affiliate. i.e. GBP. If payments were made in another currency, these have been converted to GBP. Novo Nordisk's financial systems automatically calculate currency postings based on payment date and daily exchange rate.
Reporting Period	Disclosures are made on an annual basis, and each reporting period covers a full calendar year (the "Reporting Period"). Disclosures are made within in the first six months after the end of the calendar year in which the ToV were made, no later than June 30. Disclosure of ToVs will follow the payment date and not the date of event. e.g.: An individual provides a service to Novo Nordisk in November 2020 and the ToV is paid in February 2021. This ToV will be tracked in 2021 and disclosed in 2022. ToVs made under multi-year contracts will also follow the payment date of each individual payment.
Taxes	All ToVs to the Recipient are stated in net amount.
Time of Disclosure	Disclosures must be made within 6 months after the end of the relevant Reporting Period and the information disclosed must remain in the public domain for a minimum of 3 years after the time such information is first disclosed. The general deadline for disclosures is the 30th of June. They will be disclosed on the Novo Nordisk Ltd website: www.novonordisk.co.uk
Transfer of Value (ToV)	Fees for contracted services relating to healthcare and/or disease insights will be disclosed. The following definitions apply: • Direct Transfers of Value are those made directly for the benefit of a Recipient. • Indirect Transfers of Value are those made on behalf of a pharmaceutical company for the benefit of a Recipient, or

	those made through a Third Party and where the pharmaceutical company knows or can identify the Recipient that will benefit from the Transfer of Value.
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