

NOVO NORDISK LTD Patient Organisation 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 Patient Organisations, 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 Patient Organisation report outlines

- The name of the Patient Organisation for which Novo Nordisk provided support or for which Novo Nordisk contracted with to provide a service.
- A description of the activity/project supported, or the type of service provided.
- The transaction amount in GBP

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 Patient Organisations	Donations and Grants All ToV related to donations or grants provided to a Patient Organisation are included within the scope of the disclosure. Such ToV include: - Grants – financial support - Donations - physical items, services or benefits in-kind They do not constitute an inducement to recommend the prescription, purchase, supply or administration of specific medical products. Donations and grants to individuals are not permitted. Sponsorships (including in relation to events/meetings) All ToV related to sponsorships provided to a Patient Organisation are included within the scope of the disclosure.

	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 Patient Organisation representative appears as a speaker, advisor, trainer, or consultant. These include: i. Fees (fees for services such as preparation time, rehearsal time, travel time, and time expended on the activity) ii. 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 and will be disclosed in the name of the Patient Organisation.
Cross-border Payments	Novo Nordisk defines cross-border ToV as a transfer of value to a Patient Organisation where the Novo Nordisk Affiliate providing the ToV is based outside of the country of the benefitting Patient Organisation. These ToVs are disclosed in the country where the Patient Organisation has been registered.
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.
Patient Organisation (PO):	A non-for-profit legal person/entity (including the umbrella organisation to which it belongs), mainly composed of patients and/or caregivers, that represents and/or supports the needs of patients and/or caregivers and which business address, place of incorporation or primary place of operation is in Europe.
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 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 event for which Novo Nordisk sponsors takes place 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 Patient Organisation 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)	Financial support and/or significant indirect/non-financial support provided by Novo Nordisk to a patient organisation. 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.