

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 Transfers of Value 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: <u>www.novonordisk.co.uk</u>

What the patient organisation report outlines

- The name of the patient organisation for which we provided support.
- A description of the activity or the project supported.
- The net value of support (£)

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
Cross-border Payments	Novo Nordisk define cross-border ToV payments as a Transfer of Value to a patient organisation where the Novo Nordisk Affiliate providing the funding 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 <u>payment date</u> and daily exchange rate.
Donations and Grants	Neither grants nor donations can be provided to individuals. When grants or donations are provided to patient organisa- tions, such ToV will be tracked and disclosed.
	Donations and grants are funds, benefits-in-kind or services freely given for the purpose of supporting healthcare, sci- entific research or education, with no consequent obligation on the recipient organisation, institution and the like to pro- vide goods or services to the benefit of the pharmaceutical company in return.
	In general, donations are physical items, services or benefits in-kind which may be offered or requested. Grants are the provision of funds.
	Grant or donation agreements are formalised in contracts that describe the purpose of the grant or donation and the related ToV.
Patient Organisation (PO):	A non-for-profit legal person/entity (including the umbrella organisation to which it belongs), mainly composed of pa- tients 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 Pe- riod"). Disclosures are made within in the first six months after the end of the calendar year in which the transfers of value/ payments were made, no later than June 30.
	Tracking of ToVs will follow the payment date and not the date of event. e.g.: An event 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.
Sponsorships	Sponsorships can only be provided to an organisation not an individual.

	 Covering the costs for an individual to participate in an event or similar activity is not considered a sponsorship and will be tracked as a 'Contribution to costs of Events' for the individual. Sponsorship agreements are formalised in contracts that describe the purpose of the sponsorship and the related ToV, e.g.: Hire/rental for booths in country where the Patient Organisation has its principal establishment (even if third party is appointed by Patient Organisations to manage the event). Advertisement space (in paper, electronic or other format). Satellite symposia at a congress. Sponsorship of speakers/faculty. If part of a package, drinks or meals provided by the organisers (included in the "Sponsorship Agreement"). Courses provided by a Patient Organisation (where the Member Company does not select the individuals participating). Sponsorships, defined as a financial or non-financial contribution: for a specific activity/project/event for the purpose of healthcare related education, information, research, scientific exchange Where Novo Nordisk may receive a direct tangible benefit in return.
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.novo-nordisk.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. Disclosure of a ToV follows the Recipient and not the ultimate beneficiary of the ToV. All ToVs to the recipient patient organisation are stated in Net amount.