Preamble

Novo Nordisk Ltd (herein known as "Novo Nordisk") is part of the entire Novo Nordisk group consisting of several legal entities in multiple countries. Based on its direct national pharma association membership and/or indirect EFPIA membership (via Novo Nordisk A/S in Denmark, Copenhagen), Novo Nordisk is committed to transparency, which requires public disclosure of certain Transfers of Value (TOV) to Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs) and Healthcare Organisations (HCOs) on an annual basis retrospective for the previous year. In 2024, the disclosure is based on full year 2023 data.

According to Section 23.05 of the EFPIA Disclosure Code and Clause 28.6 of the ABPI Code of Practice, the disclosing pharmaceutical company shall publish a note summarising the methodologies used in preparing the disclosures and identifying TOV for each EFPIA disclosure category described in the EFPIA Disclosure Code and the ABPI Code of Practice. The Methodological Note, including a general summary and/or country-specific considerations, describes the methodologies applied, along with any other principles, in the identification of TOVs and subsequent disclosure.

Therefore, the aim of this Methodological Note is to provide a clear and simple explanation of how Novo Nordisk fulfils its reporting obligation and provides a basic framework for interpretation. This Methodological Note is structured as follows:

1. General Summary
2. Terminology and Definitions showing how Novo Nordisk interprets the disclosure requirements.

This Methodological Note is part of the Novo Nordisk HCP/ORDM/HCO TOV reporting obligation in June 2024 for the reporting year 2023 and can be found on the ABPI Disclosure Central Platform.

1. General Summary

Novo Nordisk fully supports the disclosure initiative and puts forth its best effort to **i)** implement the transparency initiative, **ii)** interpret the EFPIA Disclosure Code and ABPI Code of Practice, according to their purpose, and **iii)** encourage its stakeholders to support the initiative to meet the underlying spirit of the EFPIA Disclosure Code and the respective local pharma association initiatives.

For TOV made to HCPs/ORDMs, disclosure is made based on a **Legitimate Interest** without affecting any individual interests, fundamental rights and freedoms. **Consent has not been sought from individuals.** When processing any personal data based on this basis, it is Novo Nordisk's priority to maintain a balance between our Legitimate Interests and the HCPs/ORDMs' privacy.

a) Territorial disclosure

Within the Novo Nordisk group it has been decided that disclosure shall be made by each local Novo Nordisk EFPIA Affiliate covering HCPs/ORDMs/HCOs having their Principal Practice in such Novo Nordisk affiliate country or in a country where Novo Nordisk acts via distributors. Disclosure is made only once (at one place) per country. If more than one country is covered by one Novo Nordisk Affiliate, the Novo Nordisk EFPIA Affiliate will submit as many reports as it covers countries (disclosed for each country in their respective language). Where Novo Nordisk has more than one Novo Nordisk organisation within the same country, the disclosure is made via the respective Novo Nordisk EFPIA Affiliate office. Cross-border payments are disclosed by Novo Nordisk EFPIA Affiliates where the Recipient has his/her Principal Practice (no matter if a foreign Novo Nordisk affiliate has contracted the HCP/ORDM/HCO in question, and no matter where the bank account is or service has been conducted). Consequently, Novo Nordisk discloses all Novo Nordisk group's TOV to HCPs/ORDMs/HCOs having their Principal Practice in the UK.

b) Data Protection

To comply with the TOV requirements, Novo Nordisk will collect, process, and disclose certain information about individuals including name, business address, contact details, nature of relationship with Novo Nordisk, tax number, unique identifier, and any TOV, included but not limited to payments or in kind from Novo Nordisk to individuals ("Personal Data"). Any Personal Data is processed, used, transferred, and disclosed in accordance with all applicable data protection laws and regulations.

Information may be requested on how a Personal Data is processed by Novo Nordisk and a demand may be made that Novo Nordisk corrects or deletes an incorrect Personal Data by contacting us at privacyuk@novonordisk.com. Please visit our webpage https://www.novonordisk.co.uk/our-privacy-policies.html to reach our Privacy Policy for more information on how we handle any Personal Data processed for TOV requirements.

c) Items excluded from Disclosure

In accordance with the EFPIA Disclosure Code and the ABPI Code of Practice, Novo Nordisk does **not** disclose the following items:

i) over-the-counter medicines, items of medical utility and meals and drinks.
ii) medical samples purchases and sales of Medicinal Products by and between a Member Company and an HCP/ORDM or an HCO.
iii) TOV related to investigational compounds and biological samples.
iv) External and internal Novo Nordisk trainings where Novo Nordisk invites HCPs to participate (without any additional money transfer or cover of expenses).

Where Novo Nordisk provides a benefit in kind to an HCO but the benefit in kind does not result in a permanent enrichment of the HCO, e.g. loan of (laboratory) equipment to a hospital in connection with and for the purpose of the HCOs conduct of a clinical trial, such benefit in kind is not disclosed.

Pass-through costs paid by Novo Nordisk to or via an HCO are disclosed although there is no enrichment of/monetary benefit to the receiving HCO. For instance, if Novo Nordisk compensates an HCO conducting a clinical study for costs towards patients' transport, and these costs are paid out to the HCO (to cover the taxi costs paid by the HCO), these pass-through costs are disclosed.

2. Terminology and Definitions

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

Terminology	Novo Nordisk approach
Accommodation	If expenses for accommodation are covered by Novo Nordisk, all expenses related to the accommodation (excluding meals and drinks) will be included in the disclosure e.g.: • room rate • fees for additional services (transaction fees, Wi-Fi, late check-out, etc.) • related taxes Meals and drinks do not have to be disclosed under the EFPIA disclosure code and therefore are separated/reduced from the accommodation invoice. (e.g. "mini bar"; restaurant/bar etc.) and only disclosed if it is a consultancy engagement.
Advisory Board	TOV related to Advisory Board activity is disclosed as 'Fee for service and consultancy', unless it falls into the Novo Nordisk definition of Research & Development (R&D) in which case it will be disclosed as aggregated TOV related to R&D.
Aggregate	Only R&D TOV is reported in aggregate.
Collaborative Working	Collaborative Working is between one or more pharmaceutical companies, healthcare organisations and other organisations. Collaborative Working, including its implementation, must have and be able to demonstrate the pooling of skills, experience and/or resources from all the parties involved for the joint development and implementation of patient and/or healthcare centered projects. There must be a shared commitment to successful delivery from all parties, and each party must make a significant contribution. In addition, collaborative working must:

	• enhance patient care or be for the benefit of patients, or alternatively benefit the NHS and, as a minimum, maintain patient care. • not constitute an inducement to health professionals or other relevant decision makers to prescribe, supply, recommend, buy, or sell a medicine. • be carried out in an open and transparent manner. • be prospective in nature. • be documented with a formal written agreement which is kept on record. • have a summary of the collaborative working agreement publicly available before arrangements are implemented. Collaborative Working is not a grant or donation. Collaborative Working includes Joint Working as per its definition under clause 20.4 of the ABPI Code. Details of collaborative working projects with Novo Nordisk can be found on the Novo Nordisk website here: Our Commitment to Transparency (novonordisk.co.uk)
CME – Continued Medical Education	TOV from Novo Nordisk to a third party (not being an HCO) that is providing HCPs with accredited Continuous Medical Education (CME) or Continuing Professional Development (CPD) - under regulations from European Accreditation Council for Continuing Medical Education (EACMME) or national bodies - will not be disclosed, when Novo Nordisk has no influence on selection of participants, programme set-up, faculty including fees and its programme content. If Novo Nordisk has influence on these elements, then all TOV must be disclosed as 'Fees for Service and Consultancy'. If Novo Nordisk has influence on selection of participants, then all TOV to identifiable HCPs must be disclosed as 'Contribution to the cost of events (fees and related expenses such as travel and accommodation).
Contribution to costs of Events	See the individual definitions of Sponsorship, Registration Fees, Travel and Accommodation under each term in this table.
CRO (Clinical Research Organisation)	If a CRO is an HCO (e.g. a hospital or a university department contracted by Novo Nordisk for CRO services), the TOV will be considered R&D related and will go into the disclosure as aggregated amounts. If the CRO acts as a Third-Party Representative (TPR) and provides a TOV to an identifiable HCP/ORDM/HCO on behalf of Novo Nordisk (pass-through costs for the TPR), these expenses are tracked like all other TOV, these

	expenses will be disclosed in the relevant disclosure category, e.g. individually as 'Fees for Service and Consultancy' or aggregated as R&D TOV, as the case may be. A "TPR" is a business partner that interacts with Public Officials/HCPs/ORDMs/HCOs on behalf of or in the interest of Novo Nordisk.
Cross-Border Payments	Disclosing the cross-border TOV is undertaken by the Novo Nordisk EFPIA Affiliate where the Recipient has its Principal Practice.
Devices	Pure devices (items of medical utility) without active ingredients are not part of the EFPIA Disclosure Code and TOV related to such are therefore not disclosed. In cases where Novo Nordisk cannot split TOV related purely to the devices, from the activities relating to devices with active ingredients, the TOV will be tracked and disclosed in the relevant EFPIA Disclosure Categories.
Disclosure Currency	Disclosure currency is the local currency of the Novo Nordisk EFPIA 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.
Documentation and Retention of Records	Novo Nordisk will fulfil the obligation of the EFPIA and 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 shall document all TOVrequired 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.
Donations and Grants	Neither grants nor donations can be provided to individual HCPs/ORDMs. When grants or donations are provided to HCOs, such TOV must be tracked and disclosed under the EFPIA category "Donations and Grants to HCOs" as stated by EFPIA. Covering the costs for an individual HCP/ORDM to attend an event as delegate is not considered a grant and will be tracked as a 'Contribution to costs of Events'. Donations and grants are funds, benefits-in-kind or services freely given for the purpose of supporting healthcare, scientific research, or education, with no consequent obligation on the recipient organisation, institution, and the like to provide 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.
Events	Event activities related to delegate participation in congresses, conferences, symposia, and similar external events will be disclosed as a 'Contribution to costs of Events' towards the individual delegate. Event activities related to HCP/ORDM delegate participation in congresses, conferences, symposia, and similar external events must be disclosed as an individual TOV. Costs related to hosting of external or internal Novo Nordisk events (e.g. meeting facilities, translation services, etc.) will not be split on and allocated to the individual participating HCPs/ORMDs. However, travel and accommodation TOV directly related to the individual participating HCPs/ORDMs are disclosed individually. TOV such as travel and accommodation, provided by third parties acting on Novo Nordisk's behalf, are tracked to the individual identifiable HCP/ORDM receiving such TOV. Travel and accommodation TOV related to HCP/ORDM consultant participation in an event may also fall under R&D TOV definition. If so, they should be tracked and disclosed as R&D TOV.
Fees for Service and Consultancy	Fees include any remuneration for services provided and related expense e.g. travel, accommodation and subsistence
Grants	See "Donations and Grants"
HCO (Health Care Organisation)	Any legal entity (i) that is a healthcare, medical or scientific association or organisation (irrespective of the legal or organisational form) such as a hospital, clinic, foundation, university or other teaching institution or learned society (except for patient organisations within the scope of the EFPIA Patient Organisation Code) whose business address, place of incorporation or primary place of operation is in Europe or (ii) through which one or more HCP's provide services. One-person HCOs (consisting of only one HCP) are defined as an HCP, in accordance with the ABPI Code of Practice. Laboratories are not considered HCOs. However, if the" laboratory test" is part of an activity within the scope of the Code e.g. R&D, the related TOV will be reported in line with the Code provision.

	Patient Organisations (POs) are not HCOs. Relations to PO's are governed through the 'EFPIA Code of Practice on Relationships between Pharmaceutical Industry and Patient Organisations' and the ABPI Code of Practice.
HCP (Health Care Professional)	Any natural person that is a member of the medical, dental, pharmacy or nursing professions or any other person who, in the course of his or her professional activities, may prescribe, purchase, supply, recommend or administer a medicinal product and whose primary practice, principal professional address or place of incorporation is in Europe. For the avoidance of doubt, the definition of HCP includes: (i) any official or employee of a government agency or other organisation (whether in the public or private sector) that may prescribe, purchase, supply or administer medicinal products and (ii) any employee of a Member Company whose primary occupation is that of a practicing HCP, but excludes (x) all other employees of a Member Company and (y) a wholesaler or distributor of medicinal products. Where an HCP is retired Novo Nordisk will disclose in aggregate in order to avoid the HCP's private address entering the public domain.
Investigator Meeting and/or meetings related to a trial	An Investigator Meeting is an event organised by/on behalf of Novo Nordisk with the purpose of training and informing investigators and other site staff about various aspects of the clinical trial. The Investigator Meeting targets participants from several clinical trial sites and when conducted face-to-face takes place outside of the clinical trial sites' premises. Depending on where the trial is in its lifecycle, it can be an initial, interim or a results Investigator meeting. In addition to Investigator Meetings, any steering or safety monitoring committees directly related to a trial will always fall under R&D TOV.
Investigator-Sponsored Study	Investigator Sponsored Study (ISS) is a clinical or non-interventional study activity for which Novo Nordisk does not act as the sponsor of the study and does not accept any responsibility for its conduct but provides funding and/or products. The clinical activities are ISS consisting of clinical trials and Non-interventional Studies (NIS) for which Novo Nordisk is not the trial/study sponsor but provides funding and/or products. If an ISS falls within the definition of R&D, then it shall be tracked and disclosed as aggregated R&D TOV.
Legitimate Interest	Legitimate Interest is a data processing activity performed to develop a transparent and professional relationship with HCPs and ORDMs including but not limited to, disclosing TOV as required by law, relevant authorities and/or industry codes of practice. Consent has not been sought from individuals for disclosure of the TOV.

Market Research Programs (MRP)	In cases where HCPs/ORDMs participating in Market Research Programs (MRP) are "blinded" or "double blinded" for the sake of methodology of the MRP and the identity of the HCP/ORDM therefore cannot be revealed to Novo Nordisk, related TOV will not be tracked and disclosed. If the identity of the HCP/ORDM is known to Novo Nordisk, related TOV will be tracked and disclosed.
Meals and Drinks	Meals and drinks are not covered by the EFPIA disclosure requirements and therefore not disclosed, except in the event of a consultancy engagement. If Novo Nordisk is unable to split meals and drinks from other TOV (e.g. provision of accommodation), the full amount will be allocated in the relevant disclosure category (e.g. 'Contribution to costs of Events').
Medicinal Products	Medicinal Products as used in the EFPIA HCP/HCO Disclosure Code has the meaning set forth in Article 1 of the Directive 2001/83/EC, including medicinal products, immunological medicinal products, radiopharmaceuticals, medicinal products derived from human blood or human plasma, for which a marketing authorisation has been delivered in application of Directive 2001/83/EC.
Other Relevant Decision Maker(ORDM)	ORDM particularly includes those with an NHS role who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply or use of any medicine but who are not health professionals. If an ORDM is retired, the TOV will be disclosed in the same way as those still in practice.
Principal Practice	Novo Nordisk will use the Primary Practice address registered in Novo Nordisk's Customer Relationship Management system. In very exceptional cases where an HCP/ORDM does not have a Principal Practice, the Private Address might be used. For example, for retired HCPs/ORDMs who have provided a service.
Publication support	HCP authors of scientific publications may receive an in-kind TOV if Novo Nordisk covers expenses for publication services provided by external agencies (e.g. statistical analysis, medical writing, editing or similar services). If publication support provided is related to activities that fall within the definition of R&D, then the TOVs shall be tracked and disclosed under R&D category. However, if the supported publication is related to the activity that does not fall within the R&D definition (e.g. a non-interventional retrospective study) it shall be tracked and disclosed as TOV to an individual recipient under the Fees for Services and Consultancy category.
Recipient	Any HCP/ORDM or HCO as applicable, in each case, whose primary practice, principal professional address or place of incorporation is in an EFPIA member country. Wholesalers, distributors or retailers of medical products are not Recipients.

	Recipient is a clearly identifiable individual HCP/ORDM or HCO. Novo Nordisk follows the ”first HCP/HCO recipient of TOV” approach to disclosure. This means that Novo Nordisk tracks and discloses TOVs to the first recipient in scope for EFPIA disclosure. For example, honoraria payments are tracked in full to the contracted HCP/ORDM/HCO, to whom the payment is made. This means that Novo Nordisk does not attempt to identify and track whether parts of a payment to the first receiving HCP/ORDM/HCO has been passed on to other HCPs/HCOs. One exception does apply for the situation of “Registration Fees”. For HCP delegates from an EFPIA country, where Novo Nordisk make payments for congress/conference registration fees to an EFPIA HCO, this TOV must be tracked to the HCP delegate. One-person HCOs (consisting of only one HCP) are defined as an HCP, in accordance with the ABPI Code of Practice. Other TOVs, such as travel and accommodation, provided directly by Novo Nordisk or by third parties acting on Novo Nordisk’s behalf, are tracked to the individual identifiable HCP receiving such TOV.
Registration Fee	All registration and participation fees related to delegate participation in conferences, symposia, congresses or similar external events. This type of TOV will always be disclosed as a TOV to an HCP/ORDM/HCO and not as R&D TOV. See above “Recipient” how Registration Fees are disclosed in detail. For authors/presenters of abstract/poster connected to a Trial/Study/Project ID, the registration fee is disclosed as a Fee for service.
Related Expenses for ‘Fees for service and consultancy’	Any TOV related to ‘Fees for service and consultancy’, e.g. accommodation, travel, meals and drinks etc.
Report Corrections	Corrections of the TOV report will be managed by Novo Nordisk on a case-by-case basis in line with EFPIA and ABPI requirements.
Reporting Period	Disclosure is made on an annual basis, and each reporting period covers a full calendar year (the “Reporting Period”). The Reporting Period is the calendar year 2023 and disclosure is made no later than 30 June 2024. In accordance with the ABPI Code of Practice, data are submitted to the ABPI by 28th March 2023 for inclusion on the central platform. Tracking of TOVs will follow the payment date and not the date of event. e.g.: An event takes place in November 2022 and the TOV is paid in February 2023. This TOV will be tracked in 2023 and disclosed in 2024.

	TOVs made under multi-year contracts will also follow the payment date of each individual payment.
R&D TOV	All TOVs to HCPs/ORDMs or HCOs related to the below will be disclosed as R&D TOV (aggregated): • Non-clinical research activities (incl. service/consultancy, grants and research collaborations) with or without connection to any Project or Study ID. • Service/consultancy, Investigator Sponsored Study Activities or grant associated with clinical development and connected* to a Project ID or Trial ID. • Service/consultancy, Investigator Sponsored Study activities or grants associated with prospective non-interventional studies and connected* to a Project ID or Study ID (except epidemiological studies based on external databases and registries). *Connection to a specific Project/Study/Trial ID must be stated in the written agreement between Novo Nordisk and HCPs/ORDMs/HCOs on service/ consultancy or grant/donation.
Sponsorship Agreement	Sponsorships can only be provided to HCOs, patient organisation or other independent organisations. Covering the costs for an individual HCP/ORDM to participate in an event or similar activity is not considered a sponsorship and will be tracked as a 'Contribution to costs of Events'. 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 HCOs has its principal establishment (even if third party is appointed by HCOs 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 an HCO (where the Member Company does not select the individual HCPs participating). Sponsorships cannot be provided to an individual HCP.

	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 • for promotional or non-promotional purposes • where Novo Nordisk receives a direct tangible benefit in return. Sponsorships provided to HCOs should be tracked and disclosed as a 'Contribution to costs of Events' (Sponsorship agreements with HCOs/third parties appointed by HCOs to manage an event). Where NN provides a Sponsorship to Other Organisations (that do not meet the definition of an HCO) and where no direct or indirect ToV is provided to an HCO, as part of the transaction, payments are not disclosed by NN
Transfers of Value (TOV)	Direct and indirect TOV, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of Prescription-Only Medicines exclusively for human use. Direct TOV are those made directly for the benefit of a Recipient. Indirect TOV 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 TOV. All TOVs to the Recipient HCPs and HCOs will be stated in gross amounts, however excluding VAT. Novo Nordisk will disclose TOV as reported in Novo Nordisk's financial systems. This means that any related taxes, not specifically listed as "VAT" will be included in the disclosed amounts. Examples include "social security expenses" and "city tax". VAT will be excluded where possible, but may in some cases be included for transnational TOV where VAT is not deductible locally. TOV related to Novo Nordisk company organised events will only be tracked and disclosed if these are related to individual travel and individual accommodation. This means that all other internal or external costs e.g. facilities, conference rooms, translation services, etc. will not be split and allocated to participating HCP individualsand will not be disclosed. TOVs related to medical samples, investigational compounds and biological samples are excluded from disclosure obligations.

	In cases where Novo Nordisk booked and paid travel and/or accommodation, but the HCP did not show up, TOV will not be allocated to this HCP. An expense held by Novo Nordisk is not in itself considered a TOV.
Travel	Costs of flights, trains, baggage handling, car hire, tolls, parking fees, taxi, visa related expenses, etc. Transport expenses that are not directly associated with/allocated to an individual HCP (e.g. where mass group transport by bus/coach is used) will not be disclosed.