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Novo Nordisk Limited: Methodological note for HCP/ORDM/HCO disclosure 2025

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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. This will consist of one disclosure per market, including all TOVs paid directly through entities belonging to Novo Nordisk A/S or indirectly through third parties acting on behalf of Novo Nordisk.

The country of disclosure will be determined by the address of principal practice for HCPs and the address of registration for an HCO.

According to Section 23.05 of the EFPIA Disclosure Code and Clause 28.6 of the ABPI 2024 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 2024 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.

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 2024 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.

Patient Organisations are not considered to be HCOs and are separately included in the Patient Organisation report displayed on Novo Nordisk's website: <https://www.novonordisk.co.uk/about/our-commitment-to-transparency.html>.

Members of the Public, including patients and journalists are not considered to be HCPs/ORDMs and are separately included as aggregate in the Members of the Public report displayed at Novo Nordisk's website: <https://www.novonordisk.co.uk/about/our-commitment-to-transparency.html>

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1 Definitions

1.1 Recipients

Definition of a Health Professional (HCP)

'Health professional' includes members of the medical, dental, pharmacy and nursing professions and any other persons who in the course of their professional activities may administer, prescribe, purchase, recommend or supply a medicine.

Definition of Other Relevant Decision Maker (ORDM)

ORDMs 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.

In the event that disclosure is being made against a deceased HCP/ORDM, where possible data will be aggregated in the "Other – Not Included Above" section of HCPs and ORDMs Disclosure template.

In the event that HCP/ORDM has retired, and HCP/ORDM still has an active OneKeyID, disclosure is being made against the retired HCP/ORDM on a named basis, using Institution address associated with OneKeyID. If no active OneKeyID exists, data will be aggregated in the "Other – Not Included Above" section of HCPs and ORDMs Disclosure template.

Definition of a HealthCare Organisation

The term 'healthcare organisation' means either a healthcare, medical or scientific association or organisation such as a hospital, clinic, foundation, university or other teaching institution or learned society whose business address, place of incorporation or primary place of operation is in Europe or an organisation through which one or more health professionals or ORDMs provide services.

1.2 Kind of TOVs

Donations and Grants to HCOs

Donations and Grants, collectively, mean providing 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 to provide goods or services to the benefit of the donor in return.

Novo Nordisk can provide this support through:

- Provision of funds (Grants): provided freely and 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. They must not bear the name of any medicine.
- Provision of physical items, services or benefits-in-kind which may be offered by Novo Nordisk (Donations): provided freely and 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. They must not bear the name of any medicine.

Sponsorship agreements with HCOs / third party organisations appointed by HCOs to manage an Event

A contribution, in whole or in part provided by or on behalf of Novo Nordisk, towards an activity (including an event/meeting or material) performed, organised, created etc. by a healthcare organisation, patient organisation or other third-party organisation.

As per Note M in the disclosure template, TOV to a healthcare organisation or a third party organisation appointed by a healthcare organisation which is not related to events/meetings and which cannot be disclosed elsewhere on the template (i.e. is not considered to be a donation or grant or contracted service or related to collaborative working) will be included in this sponsorship category.

Collaborative Working including Joint Working

Pharmaceutical companies working with other organisations to deliver initiatives which either enhance patient care or are for the benefit of patients or alternatively benefit the National Health Service (NHS) and, as a minimum, maintain patient care.

Joint Working is a form of collaborative working and is conducted for the benefit of patients and is where one or more pharmaceutical companies and the NHS pool skills, experience and/or resources for the joint development and implementation of patient centred projects and share a commitment to successful delivery.

In general, where Novo Nordisk has made a non-financial contribution to a joint or collaborative working project then such contribution will be recorded in the calendar year in which the activity took place.

Package Deals

Package Deals are commercial arrangements whereby the purchase of a particular medicine is linked to the provision of certain associated benefits as part of the purchase price, such as apparatus for administration, the provision of training on its use or the services of a nurse to administer it. TOV will be disclosed against the recipient HCO.

Contribution to Cost of Events - Registration Fees

As part of its support for continuous medical education, Novo Nordisk may cover the cost of registration fees to support an HCP/ORDM to attend educational events/meetings that are organised by independent organisations, for example a scientific congress. These costs will be disclosed as Contribution to Cost of Events – Registration Fees.

Where registration passes are purchased directly by Novo Nordisk, from an HCO (for example a learned society), on behalf of an HCP/ORDM, costs will be disclosed against the recipient HCP/ORDM.

Contribution to Cost of Events - Travel and Accommodation

As part of its support for continuous medical education, Novo Nordisk may cover travel and accommodation costs for HCPs/ORDMs attending educational events or meetings organised by independent bodies, as well as educational events or meetings organised by Novo Nordisk.

These costs may include flights, train travel, hotel accommodation, taxis, bus transfers, and other related travel expenses. Expenses related to subsistence (food and drink) are not disclosed, in line with the ABPI 2024 Code of Practice and EFPIA disclosure guidance.

Ground transportation costs (e.g., bus or taxi) arranged for group travel and not attributable to specific HCPs/ORDMs are reported in aggregate. Where the identities of the HCPs/ORDMs are known, the cost is disclosed per individual HCP/ORDM.

Contracted Services - Fees

Novo Nordisk engages HCPs/ORDMs/HCOs to provide services when there is a genuine and legitimate business need and where the HCP/ORDM/HCO is qualified and appropriate to provide the services.

These services can include but are not limited to speaking at and chairing meetings, advising, providing training and consultancy services.

When Novo Nordisk arranges for a contracted service with an HCP/ORDM via the HCPs/ORDMs employer (an HCO), TOV will be disclosed against the HCO.

Retrospective non-interventional studies, including epidemiological studies based on external databases and registries or other studies that are not submitted to authorities as per local drug law do not fall under the category of R&D activities. The TOVs related to those studies will be reported as Contracted Services under name of the recipient.

Contracted Services – Expenses

As part of contracted service, related expenses can be paid for and can include costs associated with travel, hotel accommodation, registration fees, subsistence and any visa costs. Such costs may be paid directly by Novo Nordisk to travel and/or accommodation providers or meeting organisers (where relevant) or reimbursed directly to the individual when supported by appropriate receipts.

Research and Development

All TOV related to R&D activities (as described below) performed by Novo Nordisk (including services performed by contractors not fulfilling a permanent role) or by Clinical Research Organisations on Novo Nordisk 's behalf will be disclosed on an aggregate basis:

- Non-clinical studies, (as defined in the OECD Principles of Good Laboratory Practice)
- Clinical Trials, (as defined in Regulation 536/2014)
- Non-interventional studies that are prospective in nature and that involve the collection of patient data from or on behalf of individual groups of health professionals specifically for the study

An Investigator Sponsored Study (ISS) is a clinical or non-clinical study activity for which Novo Nordisk does not act as the GxP sponsor of the study and does not accept any responsibility for its conduct but provides funding and/or products. If an ISS falls within the definition of an R&D activity, then it shall be disclosed as aggregated R&D TOV. Any costs associated with Investigational Medicinal Product (IMP) or Comparator product provided by Clinical Supplies or Local Supplies are out of scope of disclosure.

Where Novo Nordisk provides a benefit in kind to an HCO in relation to an R&D activity, 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.

Payments purely of a commercial nature such as building leases are not considered a TOV for the purposes of disclosure.

2 Disclosure's Scope

2.1 Products concerned

Only TOV associated with Prescription Only Medicines is disclosed.

2.2 Company concerned

Novo Nordisk Ltd discloses TOV provided by all of its affiliates, regional areas and HQ functions to HCPs/ORDMs and HCOs based in the UK.

2.3 Excluded TOVs

In accordance with the EFPIA Disclosure Code and the ABPI 2024 Code of Practice, Novo Nordisk does not disclose costs associated with the following:

- i) transfers of value that are solely related to over the counter (OTC) medicines.
- ii) ordinary course purchases and sales of medicines by and between Novo Nordisk and an HCP or an HCO.
- iii) samples of medicines.
- iv) provision of pens, pencils, and notebooks to meeting delegates.
- v) provision to HCPs/ORDMs of materials and items for patient support which are to be passed onto patients.
- vi) subsistence (food and drink) provided to attendees during a meeting/event organised by Novo Nordisk.

2.4 TOVs date

Where the TOV is a payment, values are reported in the year of the payment (between 01 January and 31 December).

Where the TOV is a benefit in kind, generally the values are reported in the reporting year the recipient received the benefit.

2.5 Direct TOVs

A direct TOV is one made directly by Novo Nordisk for the benefit of the recipient. The natural or legal person that holds the bank account on which the money is transferred is considered the recipient of the TOV and will be disclosed.

2.6 Indirect TOVs

Where an HCO appoints a third party to manage an event, and where the HCO ultimately benefits from that TOV, these TOVs are disclosed against the HCO. Where an event is organised on behalf of multiple HCOs without clarity on allocation, the value is divided equally between the HCOs.

Where third parties are appointed by Novo Nordisk to provide services in the form of Donations (e.g., therapy review service) the value of the donation is disclosed against the recipient HCO.

Where third parties are appointed by Novo Nordisk to make travel and accommodation arrangements for HCPs/ORDMs who are providing services or who are supported to attend events, these TOVs are disclosed against the HCP/ORDM.

Any additional administration fees charged by third parties are not included, as these are not TOVs to HCPs/ORDMs or HCOs.

When Novo Nordisk contracts with a third party that sub-contracts services to HCPs/ORDMs, Novo Nordisk discloses the TOV against the third party (if the third party is an HCO), unless Novo Nordisk has influenced the selection of the HCP/ORDM to provide the service, in which case TOV is disclosed against the HCP/ORDM.

In cases where the exact monetary value of the TOV cannot be attributed to the service/activity e.g. a Donation, Novo Nordisk will calculate a TOV value based on multiple factors including, but not limited to, number of patients, hours of service provided etc.

2.7 Non-monetary TOVs

Categories of activities resulting in non-monetary transfers of value include staff time, delivery of training and education, home delivery services.

2.8 TOVs in case of partial attendances or cancellation and refund

Where an HCP/ORDM/HCO does not receive the benefit due to a no show or a cancellation of event, the associated TOV is not disclosed. In case of partial attendance or partial service provided, only the benefits received or provided are disclosed.

2.9 Cross-border activities

TOVs associated with cross border activities are managed in accordance with the same procedures and controls as local transactions.

2.10 R&D

Where a third-party appointed by Novo Nordisk to provide services for R&D activities make TOVs to HCPs/ORDMs/HCOs, these are within scope and are reported at an aggregate level under R&D (as long as the activities fall within the scope of the definition of R&D activities).

2.11 Voluntary disclosure

N/A.

3 Specific considerations

3.1 Country unique identifier

Novo Nordisk has a unique identifier for all HCPs to ensure that transactions are reported against the correct recipient to facilitate collection of TOVs. This ID is generated by IQVIA/OneKey.

3.2 Self-incorporated HCP

If an HCP/ORDM has directed that a payment for a contracted service should be paid to a company where that HCP/ORDM is the sole shareholder (for example their own Limited company) then the TOV will be recorded against that HCP/ORDM and not the company.

3.3 Multi-year agreements

Where TOVs relate to multi-year contracts, only the TOVs made in the reporting year are included.

3.4 Country specificities

Where more than one pharmaceutical company is involved in a Collaborative Working project, Novo Nordisk will only be responsible for disclosure of financial or non-financial TOV that has been made by Novo Nordisk.

The executive summaries of each Collaborative Working/Joint Working project can be accessed via the links provided in the Report. These executive summaries are also available on Novo Nordisk UK's website - www.novonordisk.co.uk

3.5 Quality Checks

Quality control checks of vendors categorisation and transactions are completed prior to pre-disclosure period by dedicated internal and external teams.

4 Data protection legal basis

4.1 Consent collection

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 on how Novo Nordisk processes HCPs/ORDMs personal data for the purpose of complying with TOV requirements can be obtained from www.novonordisk.co.uk/our-privacy-policies. HCPs/ORDMs can always request additional information on how their Personal Data is processed by Novo Nordisk or exercise their rights by contacting Novo Nordisk at privacyuk@novonordisk.com.

When disclosing TOV, Novo Nordisk will use the primary practice address registered in Novo Nordisk's Customer Relationship Management system. In exceptional cases where an HCP/ORDM does not have a principal practice, Novo Nordisk will collect their consent prior to using their private address.

If the HCP/ORDM objects to the processing of their personal data, Novo Nordisk will assess such request on a balancing test considering the individual's interests, rights and freedoms with these legitimate grounds, and if applicable, such TOV will be reported in aggregate.

Additionally, as part of ABPI's pre-disclosure process, HCPs/ORDMs have an opportunity to verify and/or object to individual disclosure via the ABPI Pre-Disclosure Portal.

As the UK disclosure data will be hosted on the ABPI Pre-Disclosure Portal, HCPs/HCOs or ORDMs should in the first case raise queries or requests via the ABPI Pre-Disclosure Portal. If data queried by an HCP/ORDM has already been published on the public search, it will be immediately suppressed in the system and will disappear from publication until the query is

resolved. HCP/ORDMs will continue to see the queried data within their private Disclosure Portal even if it is under query.

4.2 Legitimate interests

For TOV made to HCPs/ORDMs, disclosure is made based on legitimate interests 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 Novo Nordisk's legitimate interests for disclosure of TOV and the HCPs/ORDMs' privacy.

5 Form of disclosure

5.1 Date of publication

The date of publication for United Kingdom of Great Britain & Northern Ireland for 2025 disclosures is 30 June 2026 in line with the ABPI Code of Practice for the Pharmaceutical Industry.

5.2 Disclosure platform

All UK disclosure data relating to HCOs and HCPs/ORDMs will be hosted on the ABPI Central Platform: <https://www.abpi.org.uk/reputation/disclosure-uk/>

5.3 Disclosure language

Disclosure is made in English.

6 Disclosure financial data

6.1 Currency

Disclosure currency is GBP. If payments were made in another currency, these have been converted to GBP. Calculation of currency postings are based on payment date and daily exchange rate.

6.2 VAT included or excluded

All TOVs to the Recipient HCPs/ORDMs 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.

6.3 Calculation rules

N/A

7 Additional Information

7.1 Retention of data

Novo Nordisk will fulfil the obligation of the EFPIA and ABPI 2024 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 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.