VIG Self Assesment 2021

1. Integrity
For a process evaluation how the execution of your compliance program has been in the last year, please answer the following questions:

1.1.1. Have you implemented the standards of chapter 1 in the company code of conduct,

Yes

And can you provide the Advisory Board with a copy of this code?
novo-nordisk-business-ethics-code-of-conduct.pdf (novonordisk.com)

1.2. What are the number of (relevant) employees for the Netherlands? Please provide a number. 130 employees

1.3 What was the 2021 Code of Conduct (ethics & compliance) training program for (the different) employees and what is the frequency of training?
1.3.1. Provide a short description of 2021 training program.

- E-learning Business Ethics (BE): mandatory online training program for all employees
- Introductory training for new hires on CGR and BE, including mandatory test
- Concrete/ specific CGR training for Sales Force with extensive Q&A session

1.3.2. Give a frequency number in time (e.g. once per year)

- BE e-learning: once per year
- Introductory training CGR and BE: once a month
- CGR training for Sales Force: once per year

1.4.1. Does the compliance program foresee in a risk assessment

Yes

1.4.2. When was the most recent update? Provide a date.

July 2021, will be updated again in February 2022 (is updated very 6 months)

1.5. Is there a possibility of confidential reporting for employees in case they seek guidance regarding potential of actual misconduct without fear of retaliation?
1.5.1. Yes

1.5.2. If not, why not?

1.6. Does the compliance function have access to the reporting?

No

1.7. How many people (fte) are assigned to give function to the compliance program for the Netherlands? Provide a number.

1,5 FTE

1.8. How are these people qualified? Provide a description of the qualification criteria.

Sr Director – responsible for Legal & Compliance (50% Compliance)
Professional qualification criteria:
- Education requirements:
    - o Master of Laws Degree from high-ranked Law School
    - o Member of the applicable legal law society
- Work experience
    - o Experienced and qualified lawyer (minimum 5+ years' legal experience from law firm or multinational company)
    - o On-the-job experience in tier-one law firm (in pharmaceutical, chemical, life sciences or medical device industry)
- Extensive knowledge of contracts, commercial law and pharmaceutical regulations

Professional/ manager – responsible for BE & Compliance (100% Compliance)
Professional qualification criteria:
- Education: University Master's degree
- Work experience:
    - o Experience from similar BE compliance office role
    - o Experience in the pharmaceutical or comparable industry
- Knowledge of CGR regulations

1.9. How have the senior leaders of the company encouraged or demonstrated their commitment to compliance?
Provide a description, e.g. that the compliance officer is part of the senior leader team or has direct access to the CEO, examples of internal communication from the senior leadership.

Legal and Compliance Director is member of Management Team, reporting directly into General Manager.

1.10. Has the compliance program internally been audited
1.10.1. Yes

1.10.2. And when was the last time? (Nb: this information will be treated confidential).
Provide a date: February 2021 (outcome: high level of compliance)

2. Transparency

2.1 Provide the hyperlink to the public reporting of R&D expenditure in the Netherlands in 2020 as provided for in clause 2.7 of the Code or explain when such reporting has not been taken place.

For 2021 costs are: Team JOZS/R&D: 1,4mEUR. HQ study costs cross charged: 2,2mEUR. So in total 3,6mEUR.

Novo Nordisk has joined the VIG mid 2021. so this is our first VIG reporting. This questionnaire will be posted on our website in Q1.22; we'll provide the link to VIG when done.

2.2. Has your company reported financial relations to the Transparantieregister Zorg over the year 2020?
2.2.1. Yes

2.2.2. If no, provide an explanation

2.3. Does your company scrutinize financial interests of HCP's before entering into a contract. Yes

2.3.1. If yes, provide an explanation how.

Any relevant/substantial project is only agreed on institution levels, not with individual HCP's. For all contracts financial details have to be submitted.

2.3.2. If no, provide an explanation why not.

Provide one or more examples, eg Internally safe to speak up initiatives, audit prep activities, etc. Externally, pricing communications

Yes, mainly internally, by speak-up initiatives and audits (incl. Facilitation, i.e. on 'Novo Nordisk Way of Working')

3. Social responsibility

3.1. Provide an example of the member company's contributions to innovative and/or social Initiatives (as meant in clauses 3.9 and 3.10 of the Code) in the Netherlands, such as participation in innovative and/or social programs.

Each year we sponsor a broad variety of projects at request of HCP's and Patient Organisations, in line with CGR and other relevant requirements.
In the field of Patient Advocacy in 2021 we have supported a.o. the JDRF and their OneWalk,; Diabetes+, a new patient organisation with focus on Type 1 Diabetes; the NPOO to inform patients with Obesity.
In the field of Prevention, we have a.o. supported the Bas van de Goor Foundation and the expansion of their NDC National Diabetes Challenge programme, and co-organised the "Mijn Diabetes in beweging" project to help lifestyle changes for Rotterdam inhabitants with Turkisch and Maroccan roots.

3.2. Has your company signed a Green Deal?

Yes

3.3. What have you done to further that commitment or activate it in 2021?

Locally:
- Per oct 21 only hybrid and fully electric cars are leased.
- We are implementing a "less flying" policy to half the nr of air km's within the next few years.
- We are discussing with our suppliers how they can move to green energy too, as within a decade we will only contract green suppliers.

3.3.1. If the answer to the previous question was yes, provide a date when the Green Deal was signed.

10.10.2019

3.3.2. If the answer was no, provide an explanation whether the company is planning to do so or has initiated other sustainability commitments.

3.4. Have there been any corporate decisions taken around flexibility in the workplace post COVID or safety measures implemented for onsite post-COVID that you can share? Provide one or more examples, when available.

During lockdown / working at home we have equipped all employees with needed equipment and furniture to work from home. In September 2021 we have implemented Flex-able working, where we use the office as "meeting and working together" space and maintain combined with continued working at home when wanted/needed/practical. We have also left the working hours schedule and are only planning physical meetings outside of traffic peaks, to further assure work-life balance/flexibility.

4. Quality

Patients interests are an important value of the Code (see standards 4.2 and 4.3)

4.1. Provide examples of initiatives of the company with emphasis on patient interests, eg cooperation or projects with patient organizations or projects focus.

We collaborate with patient organisations in all our therapy areas (DVN, JDRF, Diabetes+, NPOO, NVHP), to be aware of the patients' voice & to support patient advocacy / peer contact / patient education / self management / awareness, etc.

4.2. How many patients are participating in clinical trials of your company in the Netherlands in 2021?
Provide an amount of patients. 1047

4.3. How many patients are provided free medicines by your company in the following situations: (provide numbers)
4.3.1 A compassionate use program 0
4.3.2 An individual named patient approval 0
4.3.3 Between marketing authorization an reimbursement 0