

California Health & Safety Code §§ 119400-119402 2023 Annual Declaration of Compliance

Novo Nordisk has a comprehensive compliance program in accordance with California Health & Safety Code §§ 119400-119402. This comprehensive compliance program includes an annual dollar limit of \$2000 for gifts (defined as anything of value provided for free, including meals), promotional materials, or other transfers of value including items or activities that Novo Nordisk employees may give or otherwise provide to an individual medical or healthcare professional licensed by the state of California.

The annual limits do not include:

- Drug samples provided to physicians and healthcare professionals
- Financial support of continuing medical education forums
- Financial support for health education scholarships
- Payments for legitimate professional services, and any meals or expenses associated with the provision of such services
- Educational items that physicians give to their patients to enhance understanding or management of a disease state or disorder

At Novo Nordisk, we are committed to the highest ethical standards of business conduct. To the best of our knowledge and belief and based on a good faith understanding of California Health & Safety Code §§ 119400-119402, Novo Nordisk is, in all material respects, in compliance with both its compliance program and California Health & Safety Code §§ 119400-119402. This means Novo Nordisk's compliance program is operating effectively by being reasonably designed to mitigate compliance risks.

Novo Nordisk will continually evaluate and update its compliance program as necessary and appropriate given the changing environment and needs.

Any third party who has any concerns regarding Novo Nordisk's or any individual employee's compliance with its compliance program is encouraged to call the Compliance Hotline at 1-844-326-1234.

A copy of this document and a description of Novo Nordisk's compliance program may be obtained [here](#) or by calling 1-800-727-6500.