



## **California Compliance Declaration**

For purposes of compliance with the requirements of California Health and Safety code, §§ 119400-119402, Novo Nordisk has established, as part of its Comprehensive Compliance Program, an annual dollar limit concerning appropriate items covered by California law ("Covered Items") that are provided to individual California medical and healthcare professionals as part of Novo Nordisk's interactions with these professionals. Novo Nordisk has established 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 in accordance with California Health & Safety Code §§ 119400-119402.

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 professionals' 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.

## **2019 Declaration of Compliance**

For the annual period beginning January 1, 2019 and concluding December 31, 2019, Novo Nordisk set an annual aggregate limit on promotional expenditures provided to California healthcare professionals of \$2000 per covered healthcare professional. Based upon our current internal monitoring process, to the best of our knowledge and belief, and based on a good faith understanding of California Health & Safety Code §§ 119400-402, Novo Nordisk is in compliance in all material respects with the requirements described in California SB1765. 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 the Company's or any individual employee's compliance with this Compliance Program is encouraged to call the Compliance Hotline at 1-844-326-1234.

A copy of this document may be obtained by calling 1-800-727-6500.

**Novo Nordisk Inc.**  
Ethics and Compliance

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