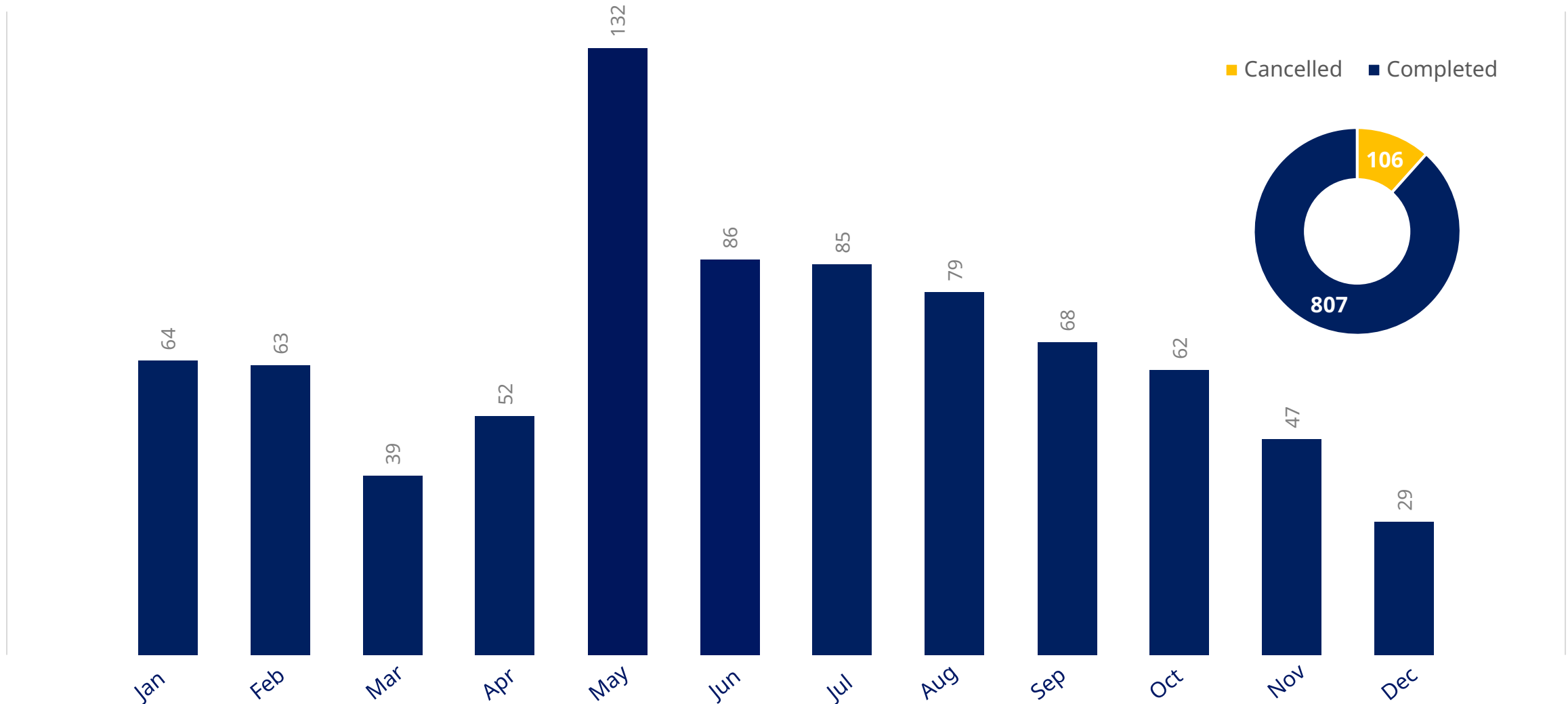


Executive Report – 2024

Legal, Ethics and Compliance - Brazil

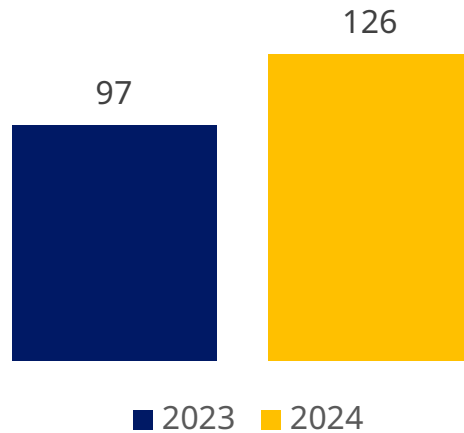
Legal

PROMOMATS APPROVED PER MONTH



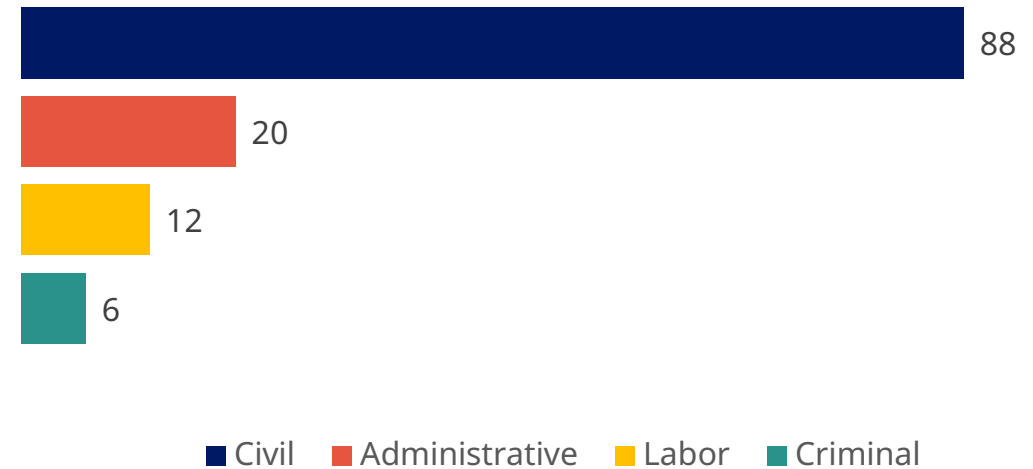
Legal - Litigation

Legal Cases



An increase of 30% in Legal Cases comparing Dec/23 vs Dec/24.

Legal Cases per Topic



** Tax legal cases are not included; hence they are handled by Tax.*

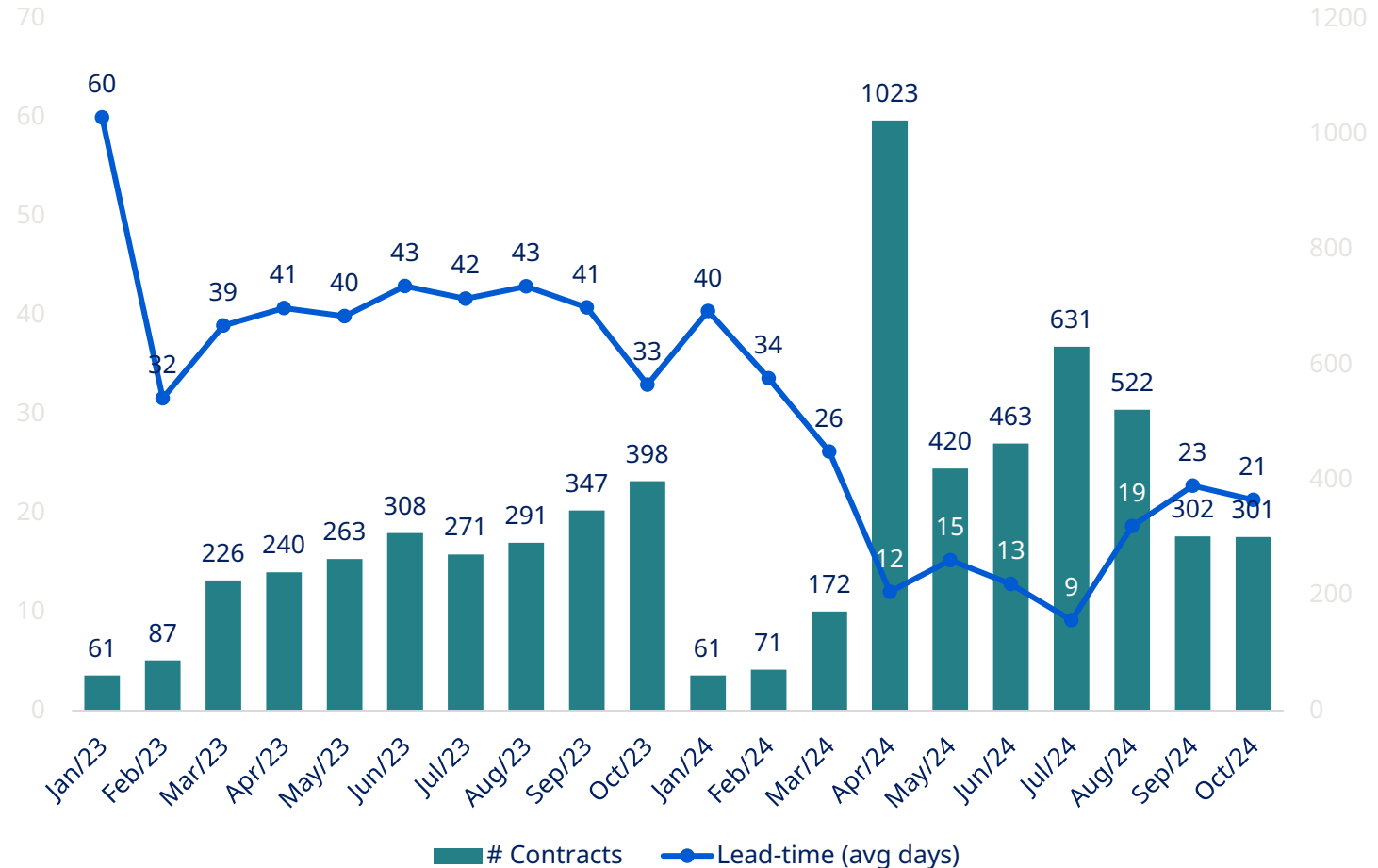
Legal - Contracts

The actions and initiatives implemented by legal department efficiently managed an increasing of contracts associated with the Wegovy launch, while also reducing the process lead-time.

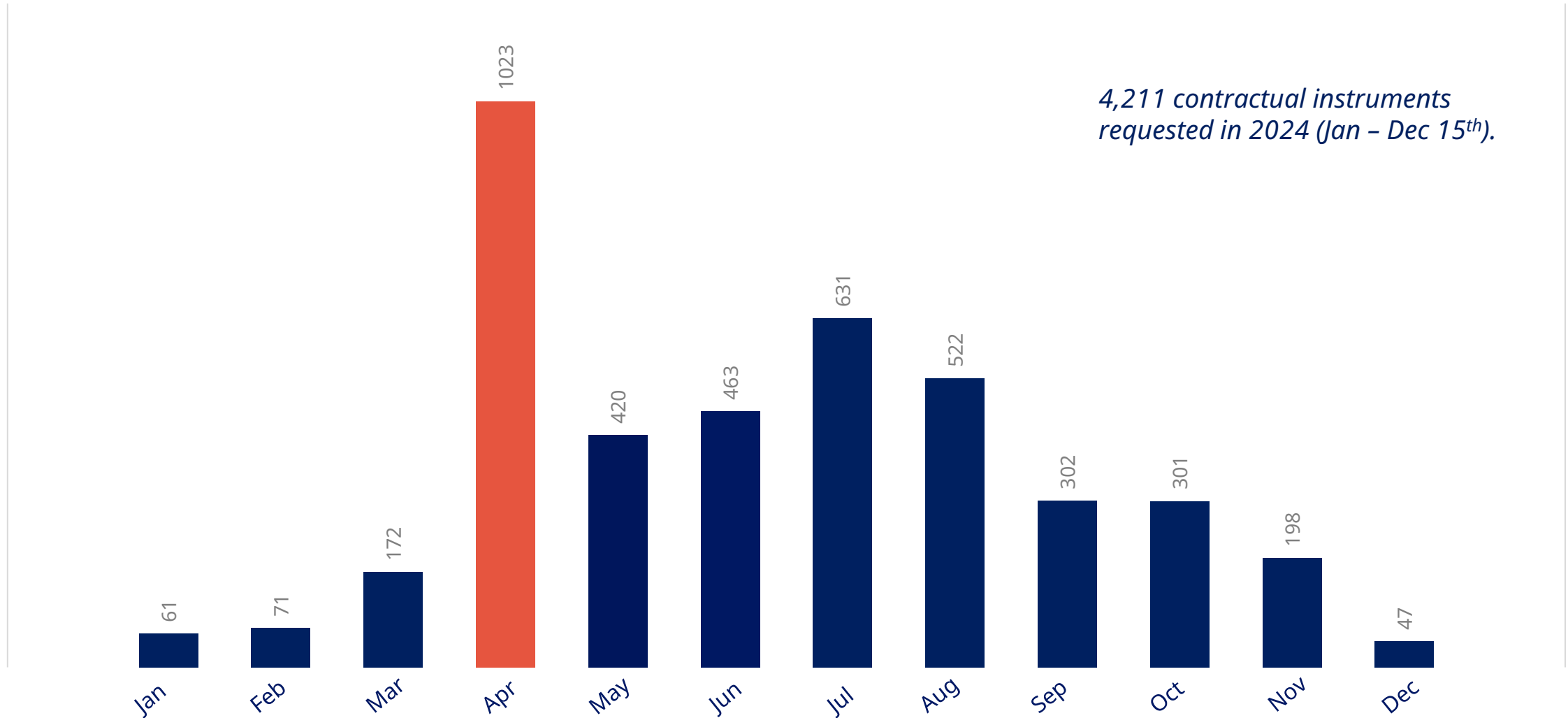
Comparing **2023 vs 2024** (Jan-Oct), the **lead-time decreased by 60%** (40 to 16 days), mainly due to the following factors:

- Unifying and simplifying **HCP's contract templates**
- Removing the requirement for **5 signatures and 2-witness signatures**
- Introducing a **digital legal stamp**, which eliminated one step of the process
- Increasing LoB's autonomy without legal approval **from \$100K\$ to \$200K\$**

In contrast, the **number of contracts increased by 59%**, largely influenced by Marketing & Medical contracts associated with Wegovy launch strategy.



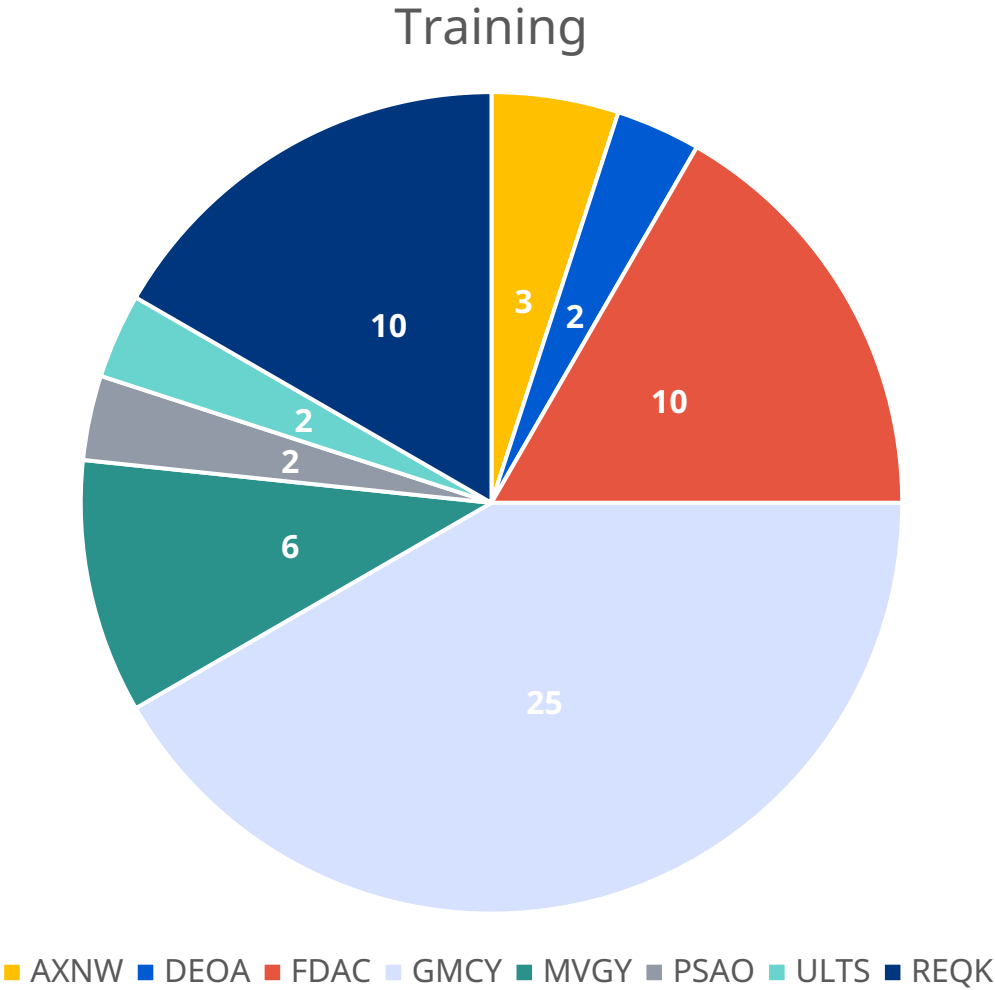
CONTRACTS PER MONTH



A decision of stopping the DCC meetings resulted in a high number of contract termination in April.

LEC Team conducted 60 trainings, such as:

- **Compliance**
 - Hotline, Anticorruption, Events
 - Concur
- **Data Privacy**
 - LGPD best practices
- **Clinical Trials**
 - New legislation of Clinical Trials
 - L&C onboarding to the CRA, CMM
- **Business Process**
 - Contracts
 - Wegovy launch
 - DOLs



Flow Project

The project targeting to reduce the complexity and process lead-time aiming to accomplish the OKR #3.

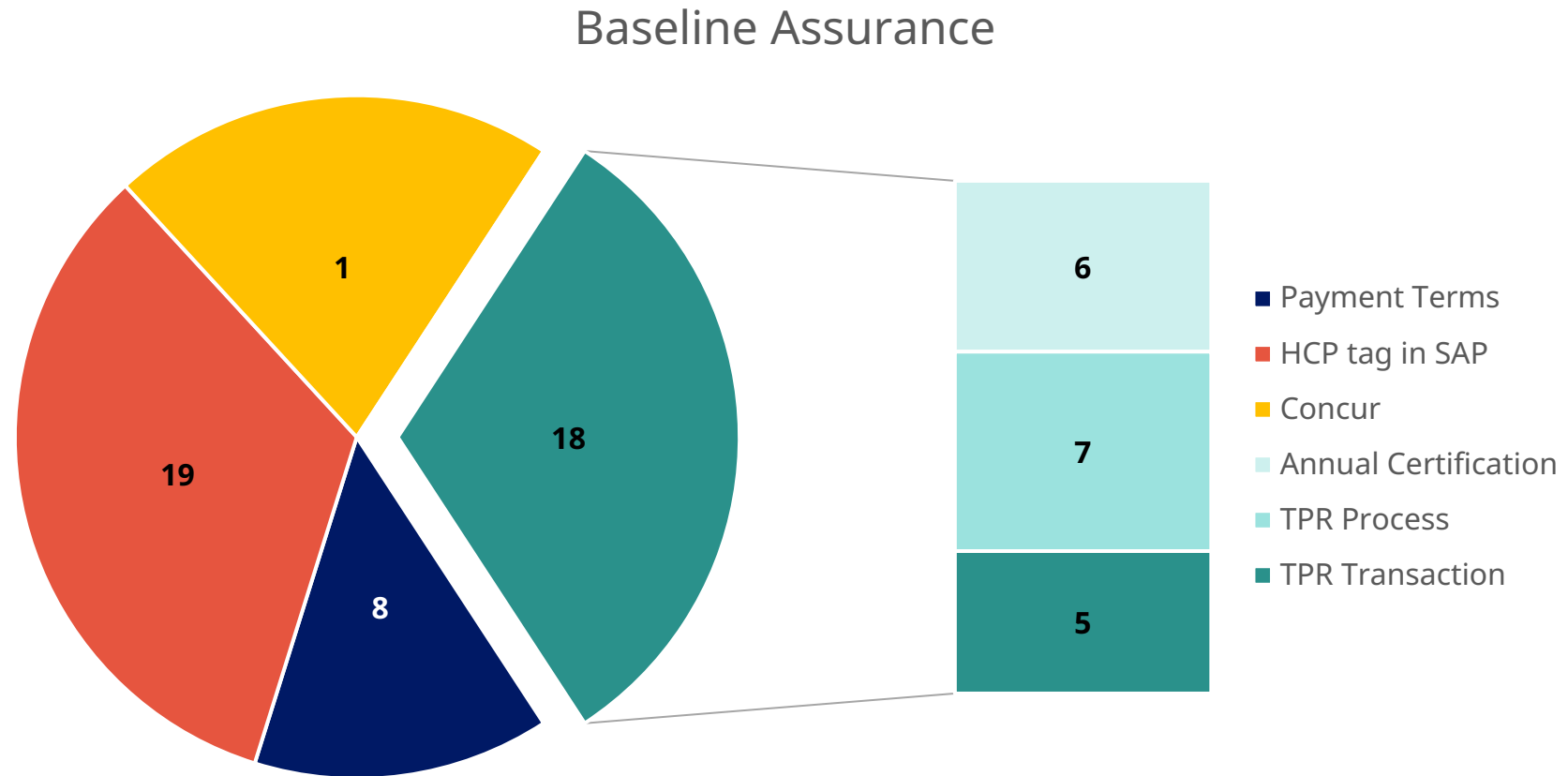
Actions and initiatives implemented by legal department efficiently managed an increasing of contracts associated with Wegovy launch, while also reducing the process lead-time 60% (from 40 to 16 days).

The main Legal deliveries to the project was:

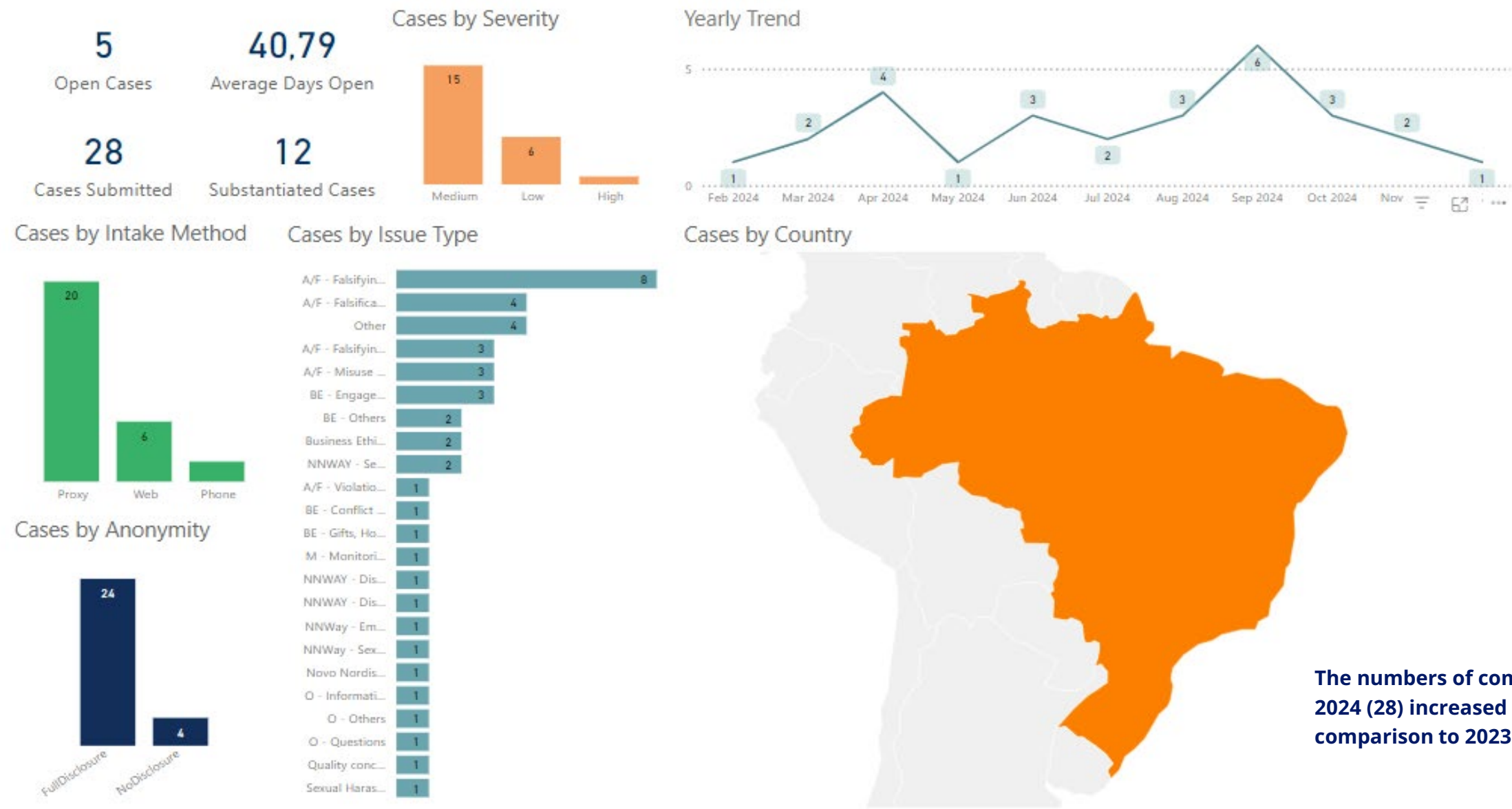
- Unification of HCP's contract templates
- Removal of witnesses' signature
- Digital Stamp
- Increasing LoB's autonomy (BRL 100k to 200k)
- Creation of Clinical Research Contract Playbook (Portuguese and English)

Compliance

Compliance – Monitoring



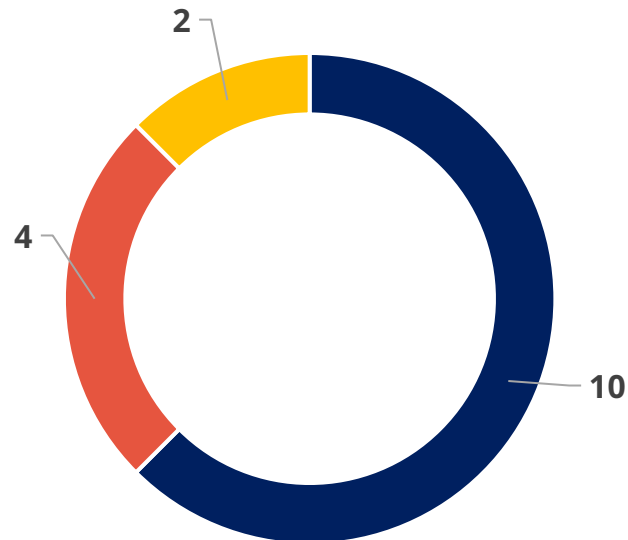
Compliance – Investigation



Compliance – Conflict of Interests

In the end of 2023, it was developed a page for Conflict of Interest disclosure.

Conflict of Interests



■ Gift, Hospitality and Entertainment ■ External Activity ■ Personal Relation ■ Others

In 2024, 16 disclosures were submitted for Compliance analysis as follow:

- 10 cases related to External Activities
 - 4 cases related to ministering classes
 - 3 cases related to invites for being speaker
 - 3 cases related to work out of Novo Nordisk
- 4 cases related to Personal Relation
 - 2 family in the company
 - 2 loving relationship
- 2 Others related to work out of Novo Nordisk

Compliance – Initiatives

Compliance + P&O

Monthly meeting with P&O to discuss initiatives, concerns, gaps, and opportunities for improvement.

Obulo Project

A 6 months project in collaboration with Commercial Effectiveness and P&O to identify points of improvement in the information provided by IQVIA via OneKey.

A platform was hired and a total of 29,495 physicians were verified, aiming to ensure more consistent information in the data available in IO Engage.

Compliance + Internal Controls

Bi-monthly meeting with Internal Controls focused on audit action plan, risks, gaps in the process, new controls, and monitoring of activities.

Compliance Partners

Implemented in the second half of the year, this group is made of 16 employees.

In a monthly basis, meetings are held to strive Business Ethics in Novo Nordisk.

The group has been discussed subjects such as Compliance best practices, anticorruption, Hotline, Concur and Corporate card.

Pharma Crime