U NOVARTIS

Payments to HCPs & HCOs

Sunshine Act & Open Payments

The Physician Payments Sunshine Act was enacted by Congress in 2010 as part of the healthcare reform law. The Sunshine Act is intended to make relationships between certain pharmaceutical and device manufacturers and healthcare providers more transparent, by requiring applicable manufacturers to report payments and other "transfers of value" provided to physicians and teaching hospitals to the Centers for Medicare and Medicaid Services (CMS). Novartis Pharmaceuticals Corporation believes that collaboration between industry and Health Care Professionals (HCPs) and Health Care Organizations (HCOs) benefits patients. This collaboration has delivered numerous innovative medicines and changed the way many diseases impact the lives of patients.

Our work with HCPs and HCOs includes a range of activities from clinical research, to educating physicians and sharing best clinical practice. For example, we engage physicians as clinical trial investigators and work with hospitals to conduct clinical research studies, which are fundamental to the development of innovative medicines and medical devices that treat and prevent illness. Clinical trials are essential to help us understand the effectiveness and safety profiles of new treatments.

We also consult doctors to get their insights and advice on diseases and products to help ensure we're developing medicines that meet the needs of patients. We make payments or other 'transfers of value' to HCPs and HCOs to appropriately compensate them at fair market value for the time spent working with us. Novartis has a comprehensive program in place to help collect, track and report these payments and transfers of value across all the Novartis Group companies covered by the Act.

Under the Sunshine Act, Novartis is required each year to submit data to the Centers for Medicare and Medicaid Services (CMS) Open Payments program as an applicable manufacturer. CMS collects information about certain payments and other transfers of value from applicable manufacturers and group purchasing organizations (GPOs) to physicians and teaching hospitals. Open Payments is the federally run transparency program that collects information about these financial relationships and makes it available to the public annually. Through the CMS Open Payments website, you can view information about Novartis' financial relationships with US Physicians and teaching hospitals, as well as the relationships that physicians and teaching hospitals maintain with other companies. Consistent with Sunshine Act obligations, additional payments from Novartis affiliates will either be consolidated with NPC payments or reported independently by the affiliate company.

Additional information on Open Payments can be accessed here.

How to View Payments

Open Payments Search Tool

To view NPC's past disclosures of payments and transfers of value to US physicians and teaching hospitals related to speaking, advising, consulting, and other transfers of value:

1. CMS Open Payments Data Search Tool website 1/2

- 2. Click the tab "Company Making Payments"
- 3. Enter the company name "Novartis Pharmaceuticals Corporation" and click "Search"
- 4. Select "Novartis Pharmaceuticals Corporation" by clicking on the company name in the search results

The CMS search tool will then display a summary of Novartis Pharmaceuticals Corporation's overall payment information. You will also have the ability to search and view more detailed payment information for individual physicians and teaching hospitals.

Contact Information

If you would like to speak with someone directly, please call 1-866-356-8735 or email <u>compliance.inquiries@novartis.com</u>.

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