

Physician Payments - Sunshine Act ^[1]

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. It is a relationship that has delivered numerous innovative medicines and changed the way many diseases impact the lives of patients.

We support the Sunshine Act and other initiatives that promote the transparency of these types of interactions and related payments and transfers of value. Bringing greater transparency to this already well-regulated relationship builds understanding of this collaboration and helps all stakeholders better understand the importance of these relationships to quality patient care. 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 facilitate programs where physicians who are experts in their fields meet with their peers to help educate them about the appropriate use of FDA-approved medicines; this helps physician's make informed prescribing decisions with their patients. Our comprehensive compliance program provides the policies, training and tools to help ensure we consistently conduct these activities responsibly and in compliance with legal and regulatory standards.

As an industry 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. We believe that disclosing payments and transfers of value related to interactions with physicians and teaching hospitals helps foster trust with patients, healthcare professionals and government officials, and reinforces adherence to high ethical business standards.

We stand by this commitment to transparency and our rigorous data collection efforts. We also recognize what a complex undertaking it is to track and report this volume of data, and we are committed to ongoing collaboration with the CMS, physicians and teaching hospitals to

help ensure we report the information requested.

These frequently asked questions provide additional information about Novartis Pharmaceuticals Corporation compliance with the Sunshine Act and the Open Payments Program.

If you have any questions about the Sunshine Act or reported payments or transfers of value please contact:

- Novartis Pharmaceuticals Corporation: (866) 356-8735 or cic.open_payments@novartis.com [2]

2017 Payments Submission – CMS

The 2017 NPC Research payments and transfers of value to US physicians and teaching hospitals that were submitted to CMS have been published on the Open Payments database. However, due to a technical issue with the 2017 NPC General Payments Report, only a small subset of this Report's payments and transfers of value appear on the Open Payments database. We have worked with CMS to address this. In the meantime, to support our efforts to openly communicate payments and transfers of value to US physicians and teaching hospitals, NPC has voluntarily published all of the payments and transfers of value included in the 2017 General Payments Report on our website. **You can view the 2017 General Payments Report here** [3]. NPC Research payments and transfers of value can be found on the [CMS website](#) [4].

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:

- Go to the CMS Open Payments Data Search Tool website at <https://openpaymentsdata.cms.gov/search> [5]
- Click the tab "Company Making Payments"
- Enter the company name "Novartis Pharmaceuticals Corporation" and click "Search"
- 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.

Novartis acquired certain oncology products from GlaxoSmithKline (GSK) in March 2015. Since the products were acquired by Novartis, GSK continued to provide certain payments and transfers of value associated with those products to Healthcare Professionals. Information about these financial relationships can also be viewed via the CMS website.

NPC believes that disclosing its payments related to interactions with physicians and related entities helps foster trust and supports our commitment to maintaining the highest ethical standards in the work we do. We are committed to transparency and to meeting all state and federal reporting requirements, including Open Payments, as well as the Corporate Integrity Agreement (CIA) which NPC entered into with the Office of the Inspector General for the Department of Health and Human Services in September 2010.

Questions? Contact NPC's Customer Interaction Center at 866-356-8735 or compliance.inquiries@novartis.com [6].

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NPC discloses payments in line with Open Payments/Sunshine Act 2017

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Links

[1] <https://www.pharma.us.novartis.com/corporate-responsibility/physician-payments-sunshine-act>

[2] mailto:cic.open_payments@novartis.com;

[3]

<https://www.pharma.us.novartis.com/sites/www.pharma.us.novartis.com/files/2017%20NPC%20General%20Payment>

[4] <https://openpaymentsdata-origin.cms.gov/summary>

[5] <https://openpaymentsdata.cms.gov/search>

[6] <mailto:compliance.inquiries@novartis.com>;