



Friday, 21 November 2014

Australian Competition & Consumer Commission
PO Box 3131
Canberra ACT 2601
adjudication@accc.gov.au

Dear Commissioners

Re: Novo Nordisk submission to the Australian Competition and Consumer Commission – Medicines Australia application for reauthorisation of Code of Conduct Edition 18 – A91436-A91440

One of the essential elements of how Novo Nordisk conducts its business is that we never compromise on quality and business ethics. Novo Nordisk therefore welcomes this opportunity to respond to the draft determination.

As a global pharmaceutical company Novo Nordisk believes it is important to achieve consistency in how we interact both ethically and transparently with our healthcare professional (HCP) stakeholders and the general public. Edition 18 of the Code of Conduct makes significant progress towards this goal.

Novo Nordisk fully supports Medicines Australia's submission in response to the draft determination. The proposed changes to Edition 18 of the Code of Conduct further the industry's commitment to increased transparency with HCP transfers of value in particular.

Furthermore Novo Nordisk supports the following aspects of the Medicines Australia submission:

- As the industry was not expecting the proposed Condition, if the ACCC were to impose such a condition its application should be deferred for 12 months to allow the industry time to embed the "reasonable expectation" of disclosure with all stakeholders. This is crucial to allow us to comply with our privacy obligations
- Transparency reporting should not refer to the name of individual medicines
- No Condition should be imposed to reduce the threshold for hospitality expenditure or to require further hospitality reporting

Novo Nordisk confirms that it will attend the pre-decision conference scheduled for 28 November 2014.

Kind Regards

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Director Biopharmaceuticals

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