Independent Review Board charter

Purpose of the Independent Review Board

Novo Nordisk has launched a web-based platform to support Novo Nordisk's policy on sharing patient-level data with external researchers[1]. Via this platform, external bona fide researchers ("Requestors") have the opportunity to submit requests for access to patient-level data from Novo Nordisk-sponsored clinical trials completed after 2001 for product indications approved in both EU and US. Access can be granted for requests which Novo Nordisk assesses can be effectively de-identified to protect patient anonymity.

The access requests will be evaluated by an Independent Review Board (IRB) to ensure that access is granted only to access requests that are scientifically sound so the data will be used in a responsible manner. The IRB has the mandate to grant access to scientifically valid and relevant requests.

Independent Review Board members

- 1 epidemiologist – whose role it will be to ensure expert evaluation of the proposed study methods and publication plans.
- 1 biostatistician – whose role it will be to ensure expert evaluation of the proposed statistical analysis plans and the appropriateness of the data to address the research questions, and any limitations and issues related to bias to consider.

Moreover, 1 diabetes expert, and 1 haemophilia expert are also appointed to the IRB. These members participate only in decisions on the requests that are relevant to their respective disease areas.

IRB members are appointed by Novo Nordisk based on their professional expertise within their respective areas and subject to entering into a Consultancy Agreement with Novo Nordisk.

Independent Review Board Chairperson

Novo Nordisk has appointed the IRB Chairperson among the IRB members and the choice of Chairperson has been endorsed by the other IRB members.

The IRB Chairperson will be responsible for the moderation of IRB discussions, as well as communication with the IRB Secretariat at Novo Nordisk and will also coordinate communication with Requestors when necessary.

Independent Review Board Secretariat

A Novo Nordisk R&D employee provides secretariat assistance to the IRB.

The IRB Secretariat is the contact point for IRB questions to Novo Nordisk.

The IRB Secretariat is responsible for the coordination of communication with the Requestors, except while the IRB decision-making process is in progress. While the IRB decision-making process is in progress the IRB Chairperson will communicate directly with the Requestor.

Access Requests

The Access Request is to include the mandatory elements listed on the access request website[2].

Evaluation Process

Independent Review Board Secretariat review of submitted access requests

For submitted access requests, the IRB Secretariat checks whether the mandatory elements have been included. The IRB Secretariat also checks whether the request pertains to data from Novo Nordisk sponsored trials completed after 2001 on Novo Nordisk product indications approved in both the EU and US and whether data is already listed in the Novo Nordisk data sharing system.

Requests for data from trials completed before 2001, for product indications not approved in both the EU and US or incomplete requests can be rejected by Novo Nordisk. In such cases, the IRB Secretariat will inform the Requestor, as well as the IRB about the rejection. The information is also included in the web log on the access request website.

For all other access requests, the IRB Secretariat will ensure assessment of feasibility and thereafter forward the access requests to the IRB.

Quarterly Independent Review Board meetings

Subject to pending requests, the IRB meets every three months to discuss and take formal decisions on the submitted access requests.

The IRB Secretariat schedules the IRB meetings according to IRB members' availability.

The meetings can take place face-to-face (provided that the location and venue are compliant with Novo Nordisk Business Ethics requirements) or via tele- or video-conference.

In order for an access request to be discussed at the IRB meeting, the complete access request must be submitted at the latest five weeks before the meeting. The IRB members will have a minimum of 3 weeks to review the access requests and have the opportunity to exchange comments and observations with each other.

The timing of the next IRB meetings is communicated on the access request website along with the deadlines for submitting proposals for review at the next meeting.

The IRB Secretariat or other Novo Nordisk employees will not participate in the formal IRB quarterly meetings where access requests are discussed and will not be included in any email correspondence regarding access requests between the IRB members.

Independent Review Board review of access requests

Following the submission of a complete request from the IRB Secretariat to the IRB, all communication with the Requestor is to be undertaken by the IRB Chairperson.

All IRB members (i.e. 2 permanent members + 1 relevant disease specialist) must participate in the review of an access request.

However, IRB members should abstain from voting on requests when they are in conflict of interest, in which case the decision will be taken by the remaining IRB members.

If an IRB member is unable to attend due to personal illness or other unforeseen significant reasons the person must communicate his/her viewpoints in writing to the IRB Chairperson as soon as possible after the meeting. If an IRB member is incapacitated for more than 7 working days, the decision will be taken by the IRB Chairperson based on the input from the remaining IRB members.

IRB members review each access request in a personal capacity, with due care, skill and ability in accordance with the individual member's expertise.

Minimum criteria for approving access

Each IRB member reviews each access request and determines whether there is any reason to reject the access request on the basis of:

- The scientific rationale and relevance of the proposed research describing the objectives and the hypotheses corresponding to the objectives of the research.
- The ability of the research data to address the research objective proposed.
- The ability of the proposed statistical analysis plan (design, methods and analysis) to meet the scientific objectives and whether this adheres to good analysis practices such as outlined in the ICH-E9 guideline, as well as the ENCePP Code of Conduct and Guide on Methodological Standards in Pharmaco-epidemiology.
- The publication plan for the research which should include timely publication of the research in a scientific publication for peer review in accordance with the Helsinki Declaration and CONSORT.
- The proposed analyses are ethically acceptable.
- The qualifications and experience of the Requestor's research team to conduct the proposed research. As a minimum a qualified statistician must be involved[3].
- The declaration of real or potential conflicts of interest that may impact the planning, conduct or interpretation of the research and the proposals to manage these conflicts of interest.

Novo Nordisk is <u>not</u> to be involved in the review discussions within the IRB or in the IRB's decisions and will <u>not</u> otherwise influence the IRB or any individual member's reviews or decisions.

Independent Review Board decision

Unless more information is required, each IRB member makes one of the following three recommendations based on the review:

1. Approval to provide access to the requested data
2. Approval to provide access to the requested data subject to conditions
3. Rejection of the access request

Where individual IRB member recommendations differ, consensus should be sought through discussion. Where consensus cannot be achieved, the Chairperson makes the final decision.

The Chairperson informs the Requestor and the IRB Secretariat of the decision and provides any conditions of access and the rationale and reasons why an access request is not approved or why conditions are required.

If conditions are required by the IRB, the IRB Secretariat ensures that these are incorporated into the Data

Sharing Agreement.

The IRB Secretariat communicates back to the Requestor the timelines for when the granted access will become effective and ensures that the weblog on the access request website is updated to include the final decision.

The IRB Secretariat ensures that the final Data Sharing Agreement signed by Novo Nordisk is returned to the Requestor.

Access will be granted for 12 months. If the requestor wishes to extend the time period, to a maximum of 24 months, an access extension must be submitted.

Publication

The requestor is to alert the IRB Secretariat when and where the requestor's study results and summary are to be published as soon as the Requestor has received confirmation of the planned publication.

Novo Nordisk contract with Independent Review Board members

IRB members have a 2-year agreement with Novo Nordisk which may be renewed.

IRB members are paid fair market value fees for their time and expertise in accordance with applicable law and guidelines.

Reasonable expenses for all necessary and reasonable travel and accommodation in relation to IRB meetings are reimbursed by Novo Nordisk upon prior agreement between the IRB member and Novo Nordisk in accordance with the provisions otherwise applied by Novo Nordisk in transactions with healthcare professionals.

IRB members' CVs and declarations of conflicts of interests are available on the access request website.

IRB members consent to the same transparency provisions as otherwise applied by Novo Nordisk in transactions with healthcare professionals and in accordance with applicable laws and industry standards.

1 http://www.novonordisk-trials.com/WebSite/Content/We-share-anonymised-data-with-other-researchers.aspx

2 http://novonordisk-trials.com/WebSite/Content/Mandatory-elements-to-be-included-in-access-requests.aspx

3 For criteria on what constitutes a qualified statistician, please see: http://onlinelibrary.wiley.com/doi/10.1002/sim.4345/pdf