

GALDERMA

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METHODOLOGY NOTES

Date: June 2020

From: Galderma (UK) Limited

To:

Subject: Galderma (UK) Limited HCP/HCO Disclosure Methodology Notes 2020

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BACKGROUND

Galderma (UK) Limited (Galderma) has decided to voluntarily disclose spend transparency data in accordance with Transparency provisions of the Association of the British Pharmaceutical Industry (ABPI) Code of Practice. Hence Galderma is publishing the data in connection to the interactions with HCPs and HCOs according to the ABPI Code of Practice (Code). Galderma also covers in this report all disclosures relevant for Ireland. Galderma also decided to publish a methodology note to summarize the methodologies used in preparing the disclosures and identifying Transfers of Value (TOV). This document supports and explains how Galderma publishes its information in order to disclose its TOVs in line with the Code in 2020.

Galderma commits to comply with the national transparency laws and regulations and the Code fully. It is our responsibility to make all the possible effort to disclose the TOVs and obtain the consents from the HCPs and HCOs.

When errors are identified in the report after the disclosure, the contact person will be informed. The report will be uploaded again once the correct information is verified.

SELECTION OF DATA

Galderma reports the data in the standardized template with the following criteria.

HCP and HCO individual information:

Given the current guidance related to Covid-19 situation to report all data in aggregate, no individual data is captured in this year's report.

Country of Principal Practice for HCP or Establishment for HCOs:

Always mentioned as UK or Ireland.

Donations and Grants to HCOs:

The scope is defined as per Clause 19 of the ABPI Code.

TOV or contribution to costs of events for HCOs:

- **Sponsorship agreement** with HCOs, third parties appointed by HCOs to manage an event.
- **Registration fees** according to the information in the invitation letter from the third party conference organization.
- **Travel & Accommodation** - To the extent governed by Clause 22 of the ABPI Code.

Fee for service and consultancy for HCPs or HCOs:

TOV resulting from or related to contracts between Galderma and HCPs or HCOs under which such HCPs or HCOs provide any type of services to Galderma or any other type of funding not covered in the previous categories. Fees, on the one hand, and on the other hand Transfers of Value relating to expenses agreed in the written agreement covering the activity will be disclosed as two separate amounts.

Total TOV of HCPs or HCOs interactions:

The total amount of TOV in relation to HCPs or HCOs interactions.

Aggregate amount attributable to transfers of value to such Recipients: HCPs and/or HCOs:

Total amount of TOV to those HCPs and HCOs

Number of Recipients (HCPs and/or HCOs) in aggregate disclosure:

Total number of HCPs and HCOs where disclosures are done in aggregate.

% of the number of Recipients (HCPs and/or HCOs) included in the aggregate disclosure in the total number of Recipients Disclosed:

Percentage of HCPs and HCOs where disclosures are done in aggregate.

R&D:

TOV referring to Research & Development as covered by Clause 23.2 of the ABPI Code. - Not applicable in 2020, as no TOV has been processed in 2020.

DATA STANDARDIZATION GUIDANCE

Galderma applies the following approaches when considering:

Applicable National Code:

TOV is disclosed in a manner consistent with the Code.

Consent Management:

No consents of HCPs have been sought as per the Covid-19 guidance. All data disclosed in 2020 are therefore in aggregate.

Cross-border TOVs:

Galderma has worked with all Galderma's affiliates worldwide to capture data relating to TOVs made by them to (i) HCPs with their principal practice in the UK or Ireland and (ii) HCOs based in the UK or Ireland. Hence, to avoid duplication, only one country always reports such TOVs irrespective of whether the activities occurred outside of the UK or Ireland, or the HCPs and HCOs were engaged by other Galderma legal entities. Galderma has used its best endeavours to include all such TOVs within its disclosure report for the UK & Ireland.

Currency or Exchange rates used:

The reporting currency is British Pound Sterling (GBP) Foreign currency is converted based on the date the payment was made. .

Documentation and Retention of Records:

All TOVs are documented pursuant to Clause 24 of the ABPI Code and Galderma maintains the relevant records of the disclosures made under this Code for a minimum of 5 years after the end of the relevant Reporting Period, unless a shorter period is required under applicable national laws or regulations.

Language of disclosure:

English

'No show' of HCPs

In the situation of 'no-show', the payment is not reported if there is no transfer of value to an HCP from Galderma. When the travel and accommodation booking cannot be cancelled, this cost is not reported while there is no transfer of value to an HCP from Galderma.

Patient Organization TOV

TOVs to Patient Organizations are reported in the same report on Galderma's website Galderma.com. The information for disclosure includes name of patient organization, total amount of TOVs in each Reporting Period related to (i) (a) monetary value of financial support and of invoiced costs; and (b) non-monetary benefit that the Patient Organization received when non-financial support cannot be assigned to a meaningful monetary benefit; and (ii) contracted services; and the description of the nature of financial or non-financial support and contracted services.

No such transaction occurred in 2020.

Reporting format or platform of disclosure:

The format of the report will be made on the corporate website of Galderma: www.galderma.com. The information provided in the report is taken from the relevant agreements made with the HCPs/HCOs and the respective details contained therein, such as HCP/HCO name, ID no (if applicable), location, cost of work, or the overall support provided, date service or support was provided and date payment was made.

Reporting period:

Disclosures shall be made on an annual basis and each reporting period shall cover a full calendar year.

For this reporting period, the TOVs between 1 January 2020 and 31 December 2020 are disclosed based on the date the relevant invoice was paid, and not the date when an HCP or HCO provides the services or the activity in scope occurred.

Treatment of multi-year contracts:

If Galderma entered in a multi-year contracts with HCPs and/or HCOs, we report the data whenever a financial transaction (TOV) occurred during the reporting year in relation to such multi-year contracts.

VAT and other tax aspects:

Value added tax (VAT) costs paid by Galderma or via a third party to the HCPs or HCOs is reported. All amounts are inclusive of VAT where VAT has been paid.

Regarding withholding tax, Galderma reports the full payment amount.

Change to disclosure process due to Covid-19:

As set out in the APBI Disclosure Update of 28 May 2020, the ABPI and the PMCPA have agreed that it would not be appropriate to write to National Health Service (NHS) workers, hospitals, and other NHS organizations at this time. This would add additional load when the NHS is rightly focused on responding to the COVID-19 pandemic. Therefore, all information has been provided in aggregate.