

GALDERMA

EST. 1981

METHODOLOGY NOTES

Date: 30.06.2023

From: Galderma SA

To: Scienceindustries

Subject: Galderma SA HCP/HCO Disclosure Methodology Notes 2022

Contact

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BACKGROUND

Galderma SA (Galderma) is a member of Scienceindustries Switzerland. Galderma is obliged to publish the data in connection to the interactions with HCPs and HCOs according to the Pharmakodex (scienceindustries) (Code). In addition, it is Galderma's responsibility to publish a methodology note as required 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 to comply with the Code in 2022.

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.

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.

Full name:

- HCP: (1) surname and (2) first names provided and confirmed by his or her institution.
- HCO: full official name (shall be the same name as in the official registry).

HCPs: city of principal practice:

This is the city of principal practice of the HCPs.

HCOs: city where registered:

This is the city where the HCOs are registered.

Country of Principal Practice:

Always mentioned as Switzerland

Principal practice address:

Further details of the address that are not yet included in the preceding columns.

Donations and Grants to HCOs:

As per the scope defined in the 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 the 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. This is in accordance of the Code.

Aggregate amount attributable to transfers of value to such Recipients (HCPs):

Total amount of TOV to those HCPs where disclosure could not be done for legal reasons.

Number of Recipients (HCPs) in aggregate disclosure:

Total number of HCPs and HCOs where disclosure could not be done for legal reasons.

% of the number of Recipients (HCPs) included in the aggregate disclosure in the total number of Recipients Disclosed:

Percentage of HCPs where disclosure could not be done for legal reasons

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:

Galderma ensures that the consent of TOV disclosure is obtained from the HCPs in each engagement according to applicable laws.

For partial consent from the HCPs Galderma publishes the data in an aggregated amount.

The consent from the HCPs can be withdrawn during the reporting period. Galderma should respect the correct and most up-to-date consent status.

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 Switzerland and (ii) HCOs based in Switzerland. Hence, to avoid duplication, only one country always reports such TOVs irrespective of whether the activities occurred outside of Switzerland, 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 Switzerland.

Currency or Exchange rates used:

The reporting currency is Swiss Franc (CHF). Foreign currency is converted based on the conversation rate of the day when the contract was signed.

Documentation and Retention of Records:

All TOVs are documented pursuant to the 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 a separate report on Galderma’s website. 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.

Reporting format or platform of disclosure:

The format of the report will be made on the, corporate website of Galderma according to the Pharma Cooperation Code.

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 2022 and 31 December 2022 are disclosed. It covers all the TOVs according to the payment date of each TOV in the accounting system, 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:

All values are reported without tax (VAT)

Regarding withholding tax, Galderma reports the full payment amount.