

GALDERMA

EST. 1981

METHODOLOGY NOTES

BACKGROUND

Although Galderma Nordic AB (Galderma) is not a member of Legemiddelindustrien (LMI) and not obliged to publish data in connection to the interactions with HCPs and HCOs according to the EFPIA HCP/HCO Disclosure Code, Galderma has decided to voluntarily comply with the disclosure requirements. In addition, Galderma 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 for the year 2022.

It is the responsibility of Galderma to make all the possible effort to disclose the TOVs and obtain the consents from the HCPs and HCOs.

SELECTION OF DATA

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

Full name:

- HCP: (1) surname and (2) first name provided in the contract with Galderma.
- 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 Norway.

Principal practice address:

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

Donations and Grants to HCOs:

See the scope in Article 3.01.1.a of the EFPIA HCP/HCO Disclosure Code.

TOV or contribution to costs of events for HCPs or 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 Article 10 of the EFPIA HCP/HCO Disclosure 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.

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

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

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

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

% 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 disclosure could not be done for legal reasons.

R&D

- TOV referring to Research & Development as defined in Section 3.04 of the EFPIA HCP/HCO Disclosure Code.

DATA STANDARDIZATION GUIDANCE

Galderma applies the following approaches when considering:

Consent Management:

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

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

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

Currency or Exchange rates used:

The reporting currency is NOK. Foreign currency is converted based on the exchange rate of the month-end accounting report.

Documentation and Retention of Records:

All TOVs are documented pursuant to Section 1.01 of the EFPIA HCP/HCO Disclosure Code and Galderma maintains the relevant records of the disclosures made under this Code for a minimum of 7 years after the end of the relevant Reporting Period.

Language of disclosure:

English

Reporting format or platform of disclosure:

The report will be published on the corporate website of Galderma.

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 amounts are excluding of VAT.