

June 2017

Galderma Hellas S.A. EFPIA HCP/HCO Disclosure Code Methodology Notes 2017

BACKGROUND

Galderma Hellas S.A. is a member of EFPIA and SFEE. It is obligatory for Galderma to publish the data in connection to the interactions with HCPs and HCOs according to the EFPIA HCP/HCO Disclosure 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 in order to comply with the EFPIA Disclosure Code in 2016.

Galderma commits to comply to the national transparency laws/ regulations and the EFPIA Disclosure 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.

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 and confirmed by his or her institution.
- HCO: full official name.

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 Greece

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

Donations and Grans 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 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 Code.

Fee for service and consultancy for HCPs or HCOs:

ToV resulting from or related to contracts between Galderma Hellas S.A and HCPs or HCOs under which such HCPs or HCOs provide any type of services to Galderma Hellas S.A. 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 with Article 3.01.1.c of the EFPIA HCP/HCO Disclosure Code.

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

Total amount of attributable to transfer of value to those HCPs and HCOs cannot disclose the data for legal reasons.

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

Total number of attributable HCPs and HCOs cannot disclose the data 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 attributable HCPs and HCOs cannot disclose the data 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 of SFEE to which it is subject for transparency.

Consent Management:

Galderma ensures that the consent of ToV disclosure is obtained from the HCPs and HCOs in each engagement and proceed with the relevant disclosure to the applicable local data protection laws before publication.

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. The correct and most up-to-date consent status should be respected by Galderma.

Cross-border TOVs:

The disclosure is always reported by the country of principal practice of the HCPs in such Galderma affiliate country. In this case, only one country reports the ToV to avoid duplication. When the ToV is shared by several Galderma entities, the home country of the HCPs having their principal practice in such Galderma affiliate country discloses the ToV.

Currency or Exchange rates used:

The reporting currency is Euro.

Documentation and Retention of Records:

All Transfer of Values are documented required to be disclosed pursuant to Section 1.01 in EFPIA Disclosure Code and maintain 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 data privacy or other laws or regulations.

Language of disclosure: Greek**'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 are arranged via an agency and the booking cannot be cancelled, this cost is not reported while there is no transfer of value to an HCP from 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 2016 and 31 December 2016 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.

Treatment of multi-year contracts:

Galderma executes the payments yearly, or at the end of the multi-year contract, or a lump-sum to the HCPs or HCOs within certain number of years based on the terms of the contracts. Galderma reports the data whenever a financial transaction occurred during the reporting year in relation to the multi-year contracts.

VAT and other tax aspects:

Value added tax (VAT) costs paid by Galderma Hellas S.A. or via a third party to the HCPs or HCOs is reported.

Regarding withholding tax and honoraria, Galderma Hellas S.A. reports the net payment amount.