

GALDERMA

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METHODOLOGY NOTES

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From: Galderma Austria GmbH

Subject: Galderma Austria GmbH HCP/HCO Disclosure Methodology Notes 2020

Contact

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BACKGROUND

Galderma Austria GmbH (Galderma) has decided to voluntarily disclose spend transparency data in accordance with Transparency provisions of the PHARMIG Code of Conduct. Hence Galderma is publishing the data in connection to the interactions with HCPs and HCOs according to the PHARMIG Code of Conduct (Code). 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 relevant transparency provisions of the Code. Galderma makes 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.

Full name:

- HCP: (1) surname and (2) first name 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 Austria.

Principal practice address:

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

Donations and Grants to HCOs:

The scope is defined as per Article 9.3. and 9.4.b of 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 Article 9.3. and 9.4.b of 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.

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 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 Article 9 of the Code.

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

Currency or Exchange rates used:

The reporting currency is EUR. Foreign currency is converted based on exchange rate on the date of the report.

Documentation and Retention of Records:

All TOVs are documented pursuant to Article 9 of 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 for the Methodology Notes and German for the Report.

'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

No TOVs to Patient Organizations have been processed in 2020, therefore no disclosure is made on Galderma website.

Pre-disclosure of TOV

Galderma does not perform pre-disclosure towards HCPs and HCOs.

Reporting format or platform of disclosure:

The format of the report will be made on corporate website of Galderma according to the 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 1 January 2020 and 31 December 2020 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:

Value added tax (VAT) costs paid by Galderma or via a third party to the HCPs or HCOs is not reported. All amounts are exclusive of VAT where VAT has been paid.

Regarding withholding tax, Galderma reports the full payment amount.

Change to disclosure process due to Covid-19:

There was no change in disclosure process in connection with Covid-19 situation. All applicable TOVs are reported according to the Code.