

METHODOLOGY NOTES



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From: Galderma Austria GmbH

To: EFPIA

Cc : -

Subject: Galderma Austria GmbH EFPIA HCP/HCO Disclosure Code Methodology Notes 2019

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BACKGROUND

Galderma Austria GmbH (Galderma) is a member of EFPIA. It is an obligation for Galderma to publish the data in connection with the interactions of 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 this information in order to comply with the EFPIA Disclosure Code in 2019.

Galderma commits to comply with 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 consent 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 (must be the same name as 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.

Unique country identifier/ HCP identification number:

A unique number is provided from the Austrian medical chamber to each HCP.

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 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:

TOVs resulting from or related to contracts between Galderma and HCPs or HCOs under which 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 with Article 3.01.1.c of the EFPIA HCP/HCO Disclosure Code.

Total TOV of HCPs or HCOs interactions

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 that cannot disclose the data for legal reasons.

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

Total number of attributable HCPs and HCOs that 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 that 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 EFPIA Code 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. Galderma should respect the correct and most up-to-date consent status.

Cross-border TOVs:

While the recipients of the TOV are HCPs of Austria, in which it is their country of principal practice, is disclosed by Galderma Entity of the country of principal practice in the report even the activities occurred outside Austria.

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 EUR. Foreign currency is converted based on Exchange rate on the Date of the report.

**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:

English , German

'No show' of HCPs

In the situation of 'no-show', the payment is reported if there is no transfer of value to a 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 a HCP from Galderma.

Reporting format or platform of disclosure:

The format of the report will be made on a corporate website of Galderma according to the EFPIA Disclosure 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 2019 and 31 December 2019 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 a 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 or via a third party to the HCPs or HCOs is not reported. The reporting is published without taxes.

Regarding withholding tax, Galderma reports the full payment amount.