

GALDERMA

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METHODOLOGY NOTES

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From: Galderma (UK) Limited

Subject: Galderma (UK) Limited HCP/HCO Disclosure Methodology Notes 2021

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BACKGROUND

Galderma (UK) Limited (Galderma) has decided to voluntarily disclose spend transparency data in accordance with the transparency provisions of the Association of the British Pharmaceutical Industry (ABPI) Code of Practice.

This note summarises 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 ABPI Code.

Galderma commits to comply with the national transparency laws and regulations and the ABPI Code fully.

If any errors are identified in the report after publication, the contact person above may be notified. The report will be republished once the correct information is verified.

Change to process due to Covid-19:

In previous years it has been agreed by the ABPI and the PMCPA that it would not be appropriate to write to NHS workers, hospitals, and other NHS organisations as this would add additional workload when the NHS is rightly focused on responding to the COVID-19 pandemic. Therefore, information has been provided in previous years in aggregate.

This approach has been reviewed in 2021 and assessed by Galderma as still being applicable.

Elements that exceed the ABPI Code requirements

Galderma covers in this report any disclosures relevant to the Republic of Ireland in addition to the United Kingdom.

Galderma manufactures and markets prescription only medicines, medical devices, over-the-counter medicines and cosmetic products. Galderma does not differentiate between transfers of value to HCPs, ORDMs, HCOs or patient organisations relating to these different types of products. Therefore, Galderma's disclosure report will detail all transfers of value irrespective of the product type or class they relate to.

SELECTION OF DATA

Galderma reports the data in the standardized template available from the PMCPA website.

Notes in relation to 2021 data

- **Donations listed to ‘Various NHS organisations’**

Galderma has made upon request donations of various personal protective equipment (PPE) available to HCOs for use in photodynamic therapy.

A value has been allocated to each unit for disclosure purposes as per the table below.

Item description	Allocated cost
HCP goggles	£70
Patient goggles	£60
Patient eye onocular caps	£16.50

In 2021 29 of these items were donated to 11 various NHS institutions. A breakdown of the individual institution recipients is available on request.

- **R&D ToVs**

Please note that no costs related to R&D have been processed by Galderma in 2021.

- **ToVs to Patient Organisations**

No ToVs to Patient Organisations took place in 2021

DATA STANDARDIZATION GUIDANCE

Galderma applies the following approaches when considering:

Applicable National Code

ToVs are disclosed in a manner consistent with the ABPI Code.

Lawful basis for processing data

Galderma uses consent as the lawful basis for processing data.

As per the Covid-19 guidance, all data disclosed in 2021 are in aggregate therefore no consents of HCPs have been sought for this particular year.

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 the UK or Ireland and
- (ii) HCOs based in the UK or Ireland.

Galderma has used its best endeavours to include all such TOVs within its disclosure report for the UK & Ireland.

Currency or Exchange rates used

All disclosed data is in British Pound Sterling (GBP). Where payments were converted from another currency, the calculations reflect an approximate exchange rate.

Documentation and Retention of Records

Galderma maintains the relevant records of the disclosures made under the ABPI 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

The information declared does not include ToVs for any planned activities and transfers where HCPs did not, for whatever reason, complete.

Patient Organization TOV

ToVs to Patient Organizations are also reported on Galderma's website Galderma.com. 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 Galderma corporate website: www.galderma.com

Reporting period

Disclosures shall be made on an annual basis and each reporting period shall cover a full calendar year.

ToVs are disclosed based on the date payment was made and not the date when an HCP or HCO provided the service or when the activity in scope occurred.

Treatment of multi-year contracts

If Galderma entered in a multi-year contract with an HCP/HCO, data is reported in line with when a financial transaction occurred during the reporting year in relation to such multi-year contracts.

VAT and other tax aspects

All amounts are exclusive of Value Added Tax (VAT).