

METHODOLOGY NOTES

Date: 30.06.2017

From: Galderma Austria GmbH

To: EFPIA

Cc :

Subject: Galderma Austria GmbH EFPIA HCP/HCO Disclosure Code Methodology Notes 2016

Contact Person: Dominik Walter, Commercial Director
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BACKGROUND

Galderma Austria GmbH (Galderma) is a member of EFPIA. It is obliged 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.

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. The corrected report will be submitted to the responsible person in the Austrian Affiliate who is able to upload data on the local Galderma website via Email. The completion of uploading will be confirmed to the contact person.

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.

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 and HCPs or HCOs under which such HCPs or HCOs provide any type of services for pharmaceutical products which fall under the scope of prescription 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 are reported on the transparency sheet.

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

Cross-border TOVs:

While the recipients of the TOV are HCPs of Austria, 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 the Exchange Rate on the Date of the Report.

Documentation and Retention of Records:

All TOV 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 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 format or platform of disclosure:

The format of the report will be made on a website of Galderma's affiliate 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 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 or via a third party to the HCPs or HCOs is not reported. The reporting is published without taxes.