

METHODOLOGY NOTES

Date: May 25, 2020

From: Galderma Benelux BV

To: Galderma International

Cc :

Subject: Galderma Benelux BV EFPIA HCP/HCO Disclosure Code Methodology Notes 2019

Contact Person: Lies Paepen, Head of Regulatory and Medical Affairs

BACKGROUND

Galderma Benelux BV (Galderma) is a member of the Association Pharmaceutique Luxembourgeoise - APL. 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 its information in order to comply with the EFPIA Disclosure Code in 2019.

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.

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 Luxembourg

Principal practice address:

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

Unique country identifier/ HCP identification number.

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.

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Fee for service and consultancy for HCPs or HCOs:

TOV resulting from or related to contracts between Galderma Benelux and HCPs or HCOs under which such HCPs or HCOs provide any type of services to Galderma Benelux 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 in 2019: EUR 1.581,00

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

Total amount of attributable to transfers of value to those HCPs and HCOs cannot disclose that 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 Code de Deontologie 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 Luxembourg, in which it is their country of principal practice, is disclosed by the Galderma Entity of the country of principal practice in the report even if the activities occurred outside Luxembourg.

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.

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Documentation and Retention of Records:

All Transfers of Value documented are required to be disclosed pursuant to Section 1.01 in the EFPIA Disclosure Code. The relevant records of the disclosures made under this Code must be kept 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

'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.

Patient Organization TOV

Patient Organization is reported in a separate report on Galderma's website. The information for disclosure includes name of patient organization, total amount of transfer of value in each reporting period and the nature of financial support.

Pre-disclosure of TOV

HCPs and HCOs receive the pre-disclosure report from Galderma to confirm the accuracy of the data and their consent of disclosure. The report is published after the verification from the HCPs and HCOs.

Reporting format or platform of disclosure:

The report will be in PDF format according to the Code de Deontologie.

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 a 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 reported.

Regarding withholding tax, Galderma reports the full payment amount.