

**DISCLOSURE OF TRANSFERS OF VALUE TO  
GERMAN HEALTHCARE PROFESSIONALS AND  
HEALTHCARE ORGANISATIONS AND PATIENT  
ORGANISATIONS in Germany**

**METHODOLOGICAL NOTES**

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METHODOLOGICAL NOTES ACCOMPANYING, DATA DISCLOSURE OF TRANSFERS OF VALUE TO GERMAN  
HEALTHCARE PROFESSIONALS AND HEALTHCARE ORGANISATIONS

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## INTRODUCTION

Pharma Mar S.A. is a member of the European Bio-pharmaceutical Enterprises (EBE), a specialized group of research-based pharmaceutical companies within EFPIA (European Federation of Pharmaceutical Industries and Associations). As such, Pharma Mar S.A. is bound by the EFPIA Code on Disclosure of Transfers of Value from Pharmaceutical Companies to Healthcare Professionals and Healthcare Organizations [1] to disclose any amount attributable to Transfers of Value to Healthcare Professionals and Healthcare Organizations in each Reporting Period.

EFPIA Code 2020 [1] states in article 23 that together with the template describing the Transfers of Value, each Member Company shall publish a note summarizing the methodologies used by it in preparing the disclosures and identifying each category of the Transfers of Value. The note, including a general summary and/or country specific considerations, shall describe the recognition methodologies applied, and should include the treatment of multi-year contracts, VAT and other tax aspects, currency aspects and other issues related to the timing and amount of Transfers of Value for purposes of the Code.

The Transfer of Value published on our website is to support and fulfil requirements on transparency and obligations derive from the Code of FSA. The publication of this information does not give a general permission to those parties accessing it to undertake additional processing of the data, such as crossing the data with information published in websites of other members, for their own benefit as personal data protection should always be taken in consideration when processing personal data as necessary in each country.

## CONTENT

### 1. General Summary & Country considerations

This methodological note is referred to any Transfer of Value made by PharmMar S.A. in 2019 to any HCP practicing their profession in Germany or HCO headquartered in Germany. Due to the

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german FSA patient organisations code we hereby also disclose the grants to patient organisations. Since disclosures shall be made pursuant to the national code of the country where the Recipient<sup>1</sup> has its physical address, Pharma Mar's declaration is regulated by the "FSA-Transparenzkodex" from the "Freiwillige Selbstkontrolle für die Arzneimittelindustrie e. V." (FSA) [2]

Transfers of Value to German HCPs/HCOs related to Research & Development that can be clearly linked to activities as defined in Article 23 of the EFPIA Code 2019 <sup>[1]</sup>, have been declared as an aggregate amount under the "Research and Development Transfers of Value" category. These amounts may include as underlying concepts not only Investigators payments and grants, but also administrative fees, concomitant medication, expenses on diagnostics tools and other similar concepts.

However please note that Pharma Mar has not allocated under the "Research and Development Transfers of Value" category those amounts which Pharma Mar cannot accurately ascertain to have been transferred to the relevant HCP that acts as an investigator in the conduction of a clinical trial, or transferred to a specific HCO, whatever the category of the Transfer of Value may be. In this regard, Pharma Mar shall not include under the "Research and Development Transfers of Value" category for the Germany disclosure any payments done to Clinical Research Organizations (CRO) acting on behalf of Pharma Mar in the conduction of a clinical trial where the amount of the Transfer of Value, the category and/ or final recipient of the transfer of value cannot be ascertained in a reliable form under the methodology used by Pharma Mar (e.g. some international trials) and we will disclose those amounts in full in the "Research and Development Transfers of Value" section of Disclosure of Pharma Mar in Spain (i.e. the contracting company) instead.

PharmaMar will disclose this year all Transfer of Value (ToV) for Clinical Trials in aggregate under the category of R&D: Independently of whether PHM is the Sponsor or Not, and including all Medical Affairs and Clinical Development managed trials (by HQ and affiliates).

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<sup>1</sup> In accordance with EFPIA HCP/HCO Disclosure Code, "Recipient" is any Health Care Professional or Healthcare Organization as applicable, in each case, whose primary practice, principal professional address or place of incorporation is in Europe

Disclosure will be done by Headquarter (Spain) where it has not been possible to clearly identify the ToV to a HCO/HCP/Hospital based in a country, and disclosed in the Spanish website.

Disclosure will include multi-country trials (and independently of how / in which countries the CRO then allocates the money). If a trial occurs in various countries, disclosure will be done by Headquarter (Spain).

Furthermore, in many cases the information will only be available to the CRO / Sponsor and not to us, therefore unless legally required, all ToV for R&D will be disclosed by HQ (Spain).

Transfers of Value for a certain event can be committed up to a total amount previously approved by the Pharma Mar Management. Any contribution to HCOs or HCPs has to be requested on written form; every request is evaluated and approved on a case by case basis by the Pharma Mar Management. Records with the details (name, working address, amounts transferred) of the HCPs or HCOs to whom any Transfer of Value was made are stored on electronic format. For those Events, where the approval is based on a budgeted quantity, a reconciliation is done once the invoices arrive, aiming to reflect the real amount spent and not the budgeted amount.

## 2. Methodology used

In general, Pharma Mar, requires every HCP/HCO to whom it makes a Transfer of Value to register on its online application database designated "PharmaMar Disclosure Code" [3]: in order to identify themselves, to grant their consent to authorize Pharma Mar to obtain and store their personal data according to GDPR, and finally to grant or refuse their consent to Pharma Mar to disclose and publish the Transfers of Value made in their favor on an individual basis. The "PharmaMar Disclosure Code" database is a secured database, in which the identity of the registered users is verified by means of a two-step verification process using both their e-mail address and via sms to the user's mobile phone. All the HCPs/HCOs have access to their recorded personal data at any time and by way of a specific password they may amend or change their personal information and authorizations at any time. In addition the Data Base is manually linked to Pharma Mar's proprietary CRM database for a better identification of each registered individual.

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To issue the current Disclosure of Payments to HCPs/HCOs in Germany during 2019, all the electronic records of Transfers of Value have been compiled and reviewed to avoid HCP/HCO duplications. The final list of HCPs/HCOs has been manually confronted with the obtained from the “PharmaMar Disclosure Code” database in order to identify those individuals who request an aggregated declaration of the Transfers of Value made in their favor. On certain occasions in which the engagement with the HCP/HCO is not possible through the foresaid Pharma Mar Disclosure Code database, the engagement with the HCP/HCO shall be arranged by way of a formal written agreement which shall identify the Recipient of the Transfer of Value, the subject matter of the arrangement, the amount of the Transfer of Value as well as other material provisions that may be deemed necessary between the parties. In case the Recipient of the foresaid Transfer of Value is a HCP, a specific provision in the agreement addresses Recipients’ right to grant his/her consent to Pharma Mar in order to authorize the disclosure and publication of the relevant Transfer of Value.

### 3. Other issues and criteria applied

To the best of Pharma Mar’s knowledge, the following criteria has been used to compile and summarize the information.

- Amounts are disclosed in Euros, and do not include VAT.
- All the amounts disclosed correspond to Transfers of Value that took place exclusively during 2019. In the case of multi-year contracts, the amount stated is that which was incurred and invoiced in the period of publication (2019).
- Where costs cannot be individually identified but can be applied to a number of individuals, the total cost has being split proportionally among them i.e. An invoice from a shuttle company has been applied proportionally to the HCPs.
- When despite Pharma Mar’s efforts, the HCP/HCO neither gave its permission, nor its refusal to the individual publication of their Transfers of Value; Pharma Mar S.A. has disclosed the amounts transferred on an aggregated basis.

- If a HCP cancels his/her attendance to a meeting/congress, the expense already incurred by Pharma Mar will be not allocated to him/her.

## DEFINITIONS & ABBREVIATIONS

**EFPIA:** European Federation of Pharmaceutical Industries and Associations

**EBE:** European Bio-pharmaceutical Enterprises

**HCO:** Healthcare Organization (for a complete definition of the term you may refer to the EFPIA Code on Disclosure of Transfers of Value from Pharmaceutical Companies to Healthcare Professionals and Healthcare Organizations, Schedule 1 Definition of terms)

**HCP:** Healthcare Professional (for a complete definition of the term you may refer to the EFPIA Code on Disclosure of Transfers of Value from Pharmaceutical Companies to Healthcare Professionals and Healthcare Organizations, Schedule 1 Definition of terms)

**HCP Code:** EFPIA Code on the Promotion of Prescription-Only Medicines to, and Interactions with, Healthcare Professionals, adopted by the EFPIA Board.

## REFERENCES

- [1] EFPIA European Federation of Pharmaceutical Industries and Associations, EFPIA Code of Practice 2019. [Online]. Available: <https://www.efpia.eu/media/413022/efpia-code-2019.pdf> [Accessed 26 June 2020]
- [2] Freiwillige Selbstkontrolle für die Arzneimittelindustrie e. V.“ (FSA) , "FSA-Transparenzkodex," 2020. [Online]. Available: <https://www.fsa-pharma.de/de/kodizes/transparenzkodex/inhaltsubersicht>. [Accessed 26 June 2020].
- [3] Pharma Mar S.A., "Pharma Mar Web" [Online]. Available: <https://www.pharmamar.com/>