

# DISCLOSURE OF TRANSFERS OF VALUE TO BELGIUM HEALTHCARE PROFESSIONALS AND HEALTHCARE ORGANISATIONS

## METHODOLOGICAL NOTES

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### 1. General Summary & Country considerations

This methodological note is referred to any Transfer of Value made in 2020 to any HCP practicing their profession in Belgium, as well as to HCO and PO headquartered in Belgium. During 2020 Transfers of Value have been made either by Pharma Mar S.R.L, or by Pharma Mar S.A. on behalf of their subsidiary. Nevertheless, and since most of the Transfers of Value in 2020 were made directly by, or on behalf of Pharma Mar S.R.L, it has been decided to disclose all of the Transfers of Value done in Belgium under its name.

Transfers of Value to Belgium HCPs/HCOs related to Research & Development have been declared as an aggregate amount under the “Research and Development Transfers of Value” category. The amounts disclosed under "Research & Development" caption corresponds to payments made to HCOs and 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 the foresaid amount shall not include those cases in which Pharma Mar cannot ascertain the specific amount which has been transferred to the relevant HCP that acts as an investigator in the conduction of a clinical trial, or which has been transferred to a 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 any payments done to Clinical Research Organizations 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 and we will disclose those amounts in full in the “Research and Development Transfers of Value” section of Disclosure of Pharma Mar S.A. in Spain (i.e. the contracting company) instead.

According to new version of EFPIA Code any Transfer of Value made providing financial support and/or significant indirect or non-financial support to a Patient Organization or with whom Pharma Mar has engaged to provide contracted services by a Patient Organization will be disclosed in this report separately. List of Patient Organizations includes a description of the nature of the support or services provided without the divulging confidential information. Additionally it will be included the monetary value of financial support and of invoiced costs, the non-monetary benefit that the PO receives when the non-financial support cannot be assigned to a meaningful monetary value and/or the total amount paid per Patient Organization over the Reporting Period.

### 2. Covid-19 Disclaimer

Pharma Mar has made its best human and technical effort to properly disclose all Transfers of value provided during 2020 period but even though and due to the challenging and exceptional times lived because of global pandemic and all derived cancellations and activities postponed, we are aware that minor accidental errors may had occurred. Pharma Mar is strongly committed with transparency and accuracy and therefore if

despite our best efforts, we were not able to properly reflect all Transfers of Value or a ToV that finally did not occurred was included by error, we will review it and analyze and provide accordingly a complete and adequate response and/or correct information as soon as possible.

### **3. Methodology used**

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 HCO or HCP must be requested on written form; every request is evaluated and approved on a case by case basis by Pharma Mar Management. Records with the details (name, working address, amounts transferred) of the HCP or HCO to whom any Transfer of Value was done are kept on electronic format. For those Events, where the approval is based on a budgeted quantity, reconciliation is done once the invoices arrive, aiming to reflect the real amount spent and not the budgeted amount.

To issue the current Disclosure of Payments to HCPs/HCOs in Belgium during 2020, all the electronic records of Transfers of Value have been compiled and reviewed to avoid HCP/HCO duplications.

### **4. Other issues and criteria applied**

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

- The determining criterion to include a transfer a value is the date of the event.
- Amounts are disclosed in Euros, and do not include VAT.
- All the amounts disclosed correspond to Transfers of Value that took place exclusively during 2020
- Where costs cannot be individually identified but can be applied to several individuals, the total cost has been split proportionally among them i.e. An invoice from a hotel, for an accommodation total, has been divided into "nights" and applied proportionally to the HCP hosted.

## ABBREVIATIONS

**HCO:** Healthcare Organization

**HCP:** Healthcare Professional

**PO:** Patients organizations

## REFERENCES

- [1] Pharma.Be, "Pharma.Be Code of Deontology," 2020. [Online]. Available: <http://www.pharma.be/fr/pharma-be/code-de-deontologie.html>. [Accessed 13 May 2021].
- [2] "Arrete royal portant execution de Sunshine Act, 14 Juin 2017," *Moniteur Belge*, pp. 67945-67948, 26/06/2017.

## LEGAL NOTICE

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