

METHODOLOGICAL NOTE

Disclosure of Transfers of Value by Genesis Pharma Adriatic d.o.o to healthcare professionals (HCPs) and healthcare organizations (HCOs)

Region: CROATIA

Genesis Pharma Adriatic doo (the "Company") discloses all Transfers of Value made towards HCPs and HCOs in accordance with the European Federation of Pharmaceutical Industries and Associations (EFPIA) Disclosure Code and the local code.

The published data represents the amount which was transferred to the corresponding HCO or HCP within the calendar year 2021. The value was calculated based on costs incurred and is consistent with the described below methodology used in preparing the disclosures.

Disclosure is made on this website: www.genesispharmagroup.eu.

This document summarizes the approach taken in calculating the figures stated.

Definitions:

Healthcare Practitioner (HCP): Any natural person that is a member of the medical, dental, pharmacy or nursing professions or any other person who, in the course of his or her professional activities, may prescribe, purchase, supply or administer a medicinal product and whose primary practice, principal professional address or place of incorporation is in Europe. For the avoidance of doubt, the definition of HCP includes: (i) any official or employee of a government agency or other organization (whether in the public or private sector) that may prescribe, purchase, supply or administer medicinal products and (ii) any employee of the company whose primary occupation is that of a practicing HCP, but excludes a wholesaler or distributor of medicinal products.

Healthcare Organization (HCO): Any legal person (i) that is a healthcare, medical or scientific association or organization (irrespective of the legal or organizational form) such as a hospital, clinic, foundation, university or other teaching institution or learned society (except for patient organizations) or (ii) through which one or more HCPs provide services.

Recipient: Any HCP or HCO, as applicable, in each case, whose primary practice, principal professional address or place of incorporation is in Europe.

Transfers of Value: Direct and indirect Transfers of Value, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of generic or branded prescription-only Medicinal Products exclusively for human use. Direct Transfers of Value are those made directly by the company for the benefit of a Recipient. Indirect Transfers of Value are those made by a third party (such as contractors, agents, partners or affiliates - including foundations) on behalf of the company for the benefit of a Recipient, where the identity of the company is known to or can be identified by the Recipient.

Methodology:

1. All disclosures are presented both in Euro currency and in the local currency (if different than Euro) calculated at the rate of exchange at the date of payment.
2. Disclosure has been made based on the Invoice and/or Deposit Proof.
3. The date taken into account for the purposes of the disclosure is the date of the legal document (invoice / depository, see above) for benefits actually paid during the calendar year 2021.
4. The disclosure of Transfers of Value is made either on an individual or on an aggregate basis. For the HCPs and HCOs who have not given consent for individual disclosure, the disclosure of Transfers of Value is made on an aggregate basis. In case of refusal or inability of HCP to attend an event or in case of cancellation of the event by HCO, the data are not subject to disclosure.
5. Transfers of Value that are disclosed (where applicable):
 - Registration fees: includes event registration fees, VAT and other applicable fees where required
 - Travel: includes the cost of transport, including air ticket / train / bus tickets and transfers

- Accommodation: Bed and breakfast, if the breakfast is included in the room rate, city taxes and tourist fees if any
- Fees for Service and Consultancy Fees: include the gross amount paid (comprises the net amount plus any applicable taxes).
- Donations and Grants to HCOs - all costs that are part of the contract between the company and the health care organization, such as contributions to support initiatives in HCP education, healthcare systems and practices.
- Sponsorship agreements with HCOs /third parties appointed by HCOs to manage an Event/Conference/Congress (commercial sponsorship) - the amount transferred to the HCO in return to which the company has received the opportunity to participate in the event (place for a booth, advertising and / or time for symposium), plus applicable tax