

This document is a requirement from the European Federation of Pharmaceutical Industries and Associations (EFPIA) Code. It is to be read in conjunction with the public disclosure of ToVs made to POrgs by Norgine during a given reporting period across Europe, including UK, and Australia and New Zealand, as these are the territories where Norgine has a direct presence.

This document is reviewed yearly and updated only to reflect changes in the methodology of reporting, if any.

These specific methodology notes are aligned to the ToVs made to POrg from 1Jan2024.

### 1. PURPOSE OF THE DOCUMENT

The purpose of this document is to guide the readers in understanding how Norgine derives, calculates and presents the amounts shown in its disclosure report.

### 2. DEFINITIONS

Norgine adopts the definitions of the EFPIA Code as its baseline, also reflected in its internal procedures.

- **Cross-border ToV:** a ToV to a POrg that is registered **outside** the country where the Norgine affiliate who has provided the ToV is based
- **Donation:** contributions provided to a POrg to support activities/projects that are designed to enhance healthcare in general, or to support communities in which Norgine entities are present. Donations are generally physical items, services or benefits-in-kind which may be offered or requested, with no consequent obligation on the POrg to provide goods or services to the benefit of Norgine in return
- **Grant:** unsolicited request for monetary funding (i.e. in cash) provided only to POrg to support education, to improve the quality and availability of healthcare, policy/ healthcare initiatives, and patient advocacy related activities, with no consequent obligation on the recipient to provide goods or services to the benefit of Norgine in return
- **Patient Organisation:** not-for-profit organisation (including the umbrella organisation to which it belongs), mainly composed of patients and/or caregivers, that represents and/or supports the needs of patients and/or caregivers, or that operates widely in the public domain, running awareness campaigns in therapeutic areas, support scientific research and collaborate closely with medical specialists in the field.
- **Reporting Period:** 12-month cycle running from 1<sup>st</sup> January to 31<sup>st</sup> December of the preceding year that are publicly disclosed by March of the current year (e.g. 2025 disclosure report will typically cover ToV provided between 1Jan and 31Dec 2024)
- **Sponsorship:** A payment from Norgine to a POrg towards the costs of an event or activity for which Norgine receives a tangible benefit in return
- **Tangible Benefit** (of a Sponsorship): a quantifiable or measurable deliverable that Norgine gets in return for sponsoring a meeting, such as stand space, the right to disseminate the information about the event to HCP, a symposia slot, other meeting related benefits (e.g. Norgine having its logo featuring on the event brochure, getting free delegate passes to attend the event). A fair market value assessment is performed to ensure that the cost and the value of the benefit to Norgine is appropriate and justifiable.
- **Transfers of Value:** Direct and indirect ToV, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of all Norgine products, including products in development exclusively for human use
  - Direct ToVs are those made directly by Norgine for the benefit of a POrg
  - Indirect ToVs are those made on behalf of Norgine for the benefit of a POrg, or those made through a Third Party and where Norgine knows or can identify the Recipient that will benefit from the ToV

### 3. PUBLIC DISCLOSURE

The POrgs disclosure report is published towards the end of March on a yearly basis and covers the 12-month period running from 1<sup>st</sup> January to 31<sup>st</sup> December of the preceding year. The year it relates to is prominently mentioned at the top of the transparency disclosure report.

ToVs to POrg are published annually under the Responsibility tab of the Norgine corporate website ([www.norgine.com](http://www.norgine.com)), either directly or through a link to the relevant local health authority website or portal.

#### 4. DATA RETENTION

The transparency data which Norgine uploads on health authority portals and publishes on its corporate website is kept for no longer than is necessary for the purposes for which the personal data are processed in line with article 5.1.e) UK and EU GDPR. The data is therefore kept visible for a minimum of (3) three years on Norgine's corporate website and a minimum of (5) five years on Norgine's information systems to ensure compliance with our legal obligations.

This data retention period may vary from country to country in line with local requirements.

#### 5. PRESENTATION OF THE DATA IN THE DISCLOSURE REPORT

Only countries where there has been interaction with or payment to a POrg, in cash or in kind, during the reporting period are listed within the report.

Norgine's disclosure report for POrgs shows the following information:

- **Country** where the POrg who has received a ToV from Norgine is registered
- Registered **name** of the POrg
  - For clarity, ToVs to individual patients who do not represent or are not hired through the POrg are not included in this report
- **Nature of the interaction**, either listed as:
  - 'Financial' if the ToV was in the form of a grant or a sponsorship
  - 'Non-Financial' if the ToV was through a donation or if an evaluation of a perceived equivalent value to the recipient was performed
  - 'Contracted Services' if Norgine paid a POrg a fee for a contracted service and reimbursed expenses for that same service
- **Description** of the nature of the interaction that is an expansion of the nature of the interaction and that is sufficiently complete to enable the average reader to form an understanding of the significance of the interaction without the necessity to divulge confidential information:
  - 'Grants' that are by definition the provision of a sum of money Norgine gives without getting or expecting anything in return from the POrg
  - 'Sponsorship of meeting' where Norgine provides a sum of money to the POrg for running a meeting and gets something tangible and/or of value back from the POrg
  - 'Other sponsorship' where Norgine provides a sum of money to the POrg for something other than for a meeting and gets something tangible and/or of value back from the POrg
  - 'Donations' that are by definition the provision of a benefit in kind (e.g. equipment) Norgine gives without getting or expecting anything in return from the POrg; it may extend to items provided where a perceived equivalent value to the recipient has been evaluated (e.g. what the value of the item could be worth if it was purchased; for example if this item was to be destroyed if not used and provided as a donation, the ToV could be represented by the cost of the destruction of such item rather than the cost of purchase)
  - 'Fees' for a contracted service where Norgine gives the POrg a monetary amount agreed within the contractual arrangement for the service the POrg provided
  - 'Expenses' for a contracted service where Norgine reimburses out of pocket expenses back to the POrg that relate to the service the POrg provided as part of the contractual arrangement, in addition of or instead of the fees for the service
- **Currency** in which the POrg was paid, that generally is the same as the domestic currency of the country stated
- **Amount** of the ToV the POrg received from Norgine for the interaction(s) they had during that disclosure year. A same POrg may be listed more than once in the report if the nature of the interaction and the descriptor are different, otherwise the name of the POrg will appear only once and the amount shown will be an aggregate of all the ToVs for the disclosure year.

## **6. DATA PRIVACY & LEGAL BASIS FOR DISCLOSURE**

Transparency data for POrg is disclosed on a named basis as Norgine relies on legitimate interest.

Contracts between Norgine and POrgs clearly state the requirement to publicly declare both financial support and/or significant indirect/non-financial support or fees and expenses for the provision of contracted services received by the POrgs.

## **7. UNDERSTANDING VALUES AND CALCULATIONS WITHIN THE REPORT**

### ▪ Transactions Amounts

The amounts displayed are either single or aggregated amounts calculated from the payment(s) made to POrg directly or indirectly, and available from Norgine's finance system based on the information provided within the relevant purchase order(s) for the ToV.

### ▪ Transaction Date versus Service Delivery Date

Norgine handles and declares the ToV from the time of payment to the POrgs, i.e. the transaction date, rather than when the service, interaction or event actually occurred. This means that there could be some instances where the ToV undertaken in one Reporting Period are reported in the next Reporting Period, and vice versa. ToV are always paid after the engagement has taken place or donation is provided, with the exception of grants that can be paid before the event actually takes place.

### ▪ Management of Multi-Year Contracts

In a similar spirit to the above point, where projects run for several years, Norgine declares the amount paid relevant to the year in which each part of the payment was made. For example, a project that spans 2 calendar years and includes several individual ToVs during that time will have two associated disclosures (i.e. one for each calendar year showing the value of the ToV made in the specific calendar year).

### ▪ VAT

Amounts typically exclude VAT and recoverable local taxes.

Expenses related to an event or meeting (travel, accommodation, taxi) may include VAT or local taxes where applicable. VAT, if included, is the national VAT of the country where the spend is incurred.

### ▪ Handling of Currency and Exchange Rates

The values in the disclosure template are expressed in local currency.

Where values had to be converted into local currency from another currency, the exchange rate used is clearly stated in individual declaration report.

### ▪ Cross-Border Payments

Norgine has Affiliates in many countries within and outside the European Union, and cross-border ToVs are disclosed in the local currency of the country where the POrg has been formally registered.

## **8. FURTHER INFORMATION**

Any questions or suggestions regarding the content of this document should be addressed to [contact@norgine.com](mailto:contact@norgine.com)