

METHODOLOGY NOTES

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To: European Federation of Pharmaceutical Industries and Associations Cc: [OPTIONAL]

Subject: EFPIA HCP/HCO Disclosure Code – Methodology Notes

Background

Galderma Italia S.p.A. is a member of Farindustria and obliged to publish a note summarizing the methodologies used by it in preparing the disclosures and identifying Transfers of Value.

Methodology

A. Data standardization guidance

Issue	Guidance
Temporal scope of declaration: benchmark for disclosure	DISCLOSE FOR COMPETENCE
Language of disclosure	ENGLISH
Currency or Exchange rates used	EURO
VAT and other tax aspects	VAT EXCLUDED for national congresses, VAT INCLUDED for international congress outside Italy
Other issues related to the timing and amount of Transfers of Value for purposes of this Code, as applicable	The system follows this algorithm: if the same HCP has 1 “yes consent” and 1 “no consent” it publishes all the 2 as “no consent”. For HCP declared ‘no consent’, the data will be included in the aggregated amount.