

METHODOLOGY NOTE:

DISCLOSURE AND TRANSPARENCY IN DEALING WITH HEALTHCARE PROFESSIONALS, HEALTHCARE ORGANIZATIONS AND PATIENT ORGANIZATIONS

STADA Arzneimittel AG and its affiliated companies support rules and regulations, which promote transparency regarding interactions with Healthcare Professionals.

This document outlines the methodology for disclosure of STADA Bulgaria EOOD according to the applicable provisions from the Medicines for Europe Code of Conduct (chapter 7 – Disclosure Procedure) as well as statutory and internal regulations.

1. Transparency obligations

Any transfers of value that could potentially pose a conflict of interest to HCPs, healthcare organizations and patient organizations, which includes any transfers made directly and indirectly (via a third party).

The disclosure in the current transparency report is for the year 2022 and takes place in local currency - BGN.

2. Process of Disclosure

a) Transfers of value to HCPs

For services provided by HCPs:

For each HCP the following data is published (in compliance with applicable data protection laws): Full name and total value of payments (without VAT) for all services provided in 2022. Any expenses for accommodation and travel expenses are not published.

Provided services includes especially consulting contracts, contracts on the membership in advisory boards and further service contracts - especially speaker contracts and service contracts for patient oriented programs.

For scientific meetings:

Consolidated data is published naming the event and number of HCPs.

Such educational events are defined as occupational or scientific meetings, congresses, conferences and similar events, also meetings organized by the company, site visits and educational support, which have the purpose of educating the HCP and which are organized on behalf of STADA or sponsored by STADA. In these cases, no disclosure by name of each HCP takes place.

In this category, 'support' refers to transfers of value without VAT during the reporting period in the form of:

- Registration fees to attend a third party congress/conference, including virtual meetings;
- Travel and accommodation to attend a meeting – including third party meetings, company organized meetings and site visits.
- We do not include food expenses.

b) Transfers of value to Healthcare Organizations

Any kind of donations are published by naming the healthcare organization and the kind of donation (in kind or financial). This includes a description of the type of donation including the total amount spent in BGN including VAT.

c) Transfers of value to patient organizations

STADA has made no transfers of value to patient organizations in 2022; therefore, nothing in this regard was disclosed.

d) No multiyear contracts (subject to disclosure) are in place

3. Compliance with data protection laws

Applicable data protection laws are complied with.

For HCPs, a declaration of consent needs to be obtained. In case the HCP refuses to give consent or does not declare consent, the transfer of value will be disclosed anonymously. If several HCP do not give their consent, anonymized data can be aggregated, whereat the total number of persons will be stated.