

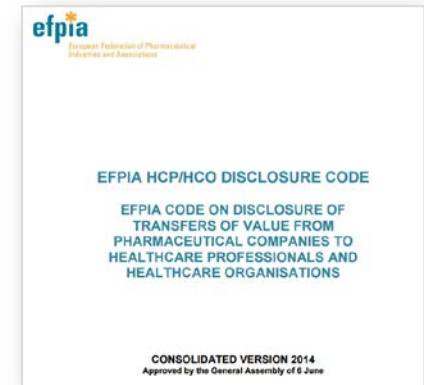
EFPIA DISCLOSURE CODE, 01.01.2015

Disclosure in 2016 – methodology and comments

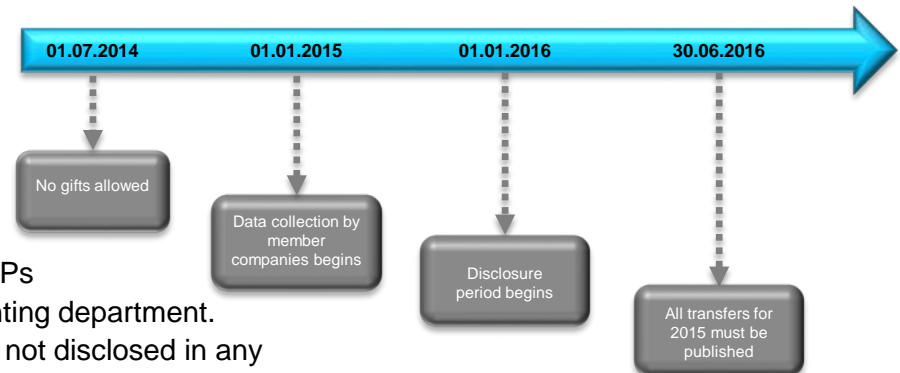


METHODOLOGICAL NOTE

The European Federation of Pharmaceutical Industries and Associations (EFPIA) presented a new code on the promotion of prescription-only medicines to, and interactions with, healthcare professionals. The intention is to increase transparency and show financial relationships between companies and healthcare organisations and physicians by publishing the information in public channels.



- **WHEN:** The Code has been valid from 01.01.2015. Disclosures shall be made on an annual basis and each reporting period shall cover a full calendar year (the “**Reporting Period**”). Transfers of Value (ToVs) made in 2015 will be published before 30th June 2016 – i.e. within 6 months after the end of the relevant Reporting Period. The date of the invoice decides which reporting period the transfer belongs to, and not the date of the event.
- **WHO:** All EFPIA Member companies must report financial transfers. Recipients: All Health Care Personnel (HCP) and all Health Care Organisations (HCO). Photocure will follow the Norwegian guidelines from LMI regardless of where the HCP or HCO operates. Individual enterprises will be treated as HCPs.
- **WHAT:** Direct or indirect payments or other ToVs such as consultancy fees, tickets or reimbursements for travel or participation fee at a congress.
- **HOW:** The ToVs are collected consecutively through the company’s employees who have interaction with HCOs and HCPs and controlled, registered and transfers executed by the accounting department. All related information is treated as sensitive information, and is not disclosed in any other ways than described in this document. ToVs are reported from the company’s transfer perspective, and not from an income perspective for the recipient. Hence, the amount shows the gross value before tax and other deductions that might apply. All amounts are registered in our accounting system.



METHODOLOGICAL NOTE (CONT'D)



- **DISCLOSURE'S SCOPE:** The disclosure of ToVs is voluntary and the recipients may choose to refrain from signing the Consent Form. In these cases the amounts will be added to an aggregated amount in which the recipients' identity will remain anonymous. The ToVs may be disclosed individually or aggregated:
 - On a category-by-category basis, provided that itemized disclosure shall be made available upon request to (i) the relevant Recipient, and/or (ii) the relevant authorities. (see Section 3.01 in the EFPIA Disclosure code)
 - Costs related to Research and Development shall be disclosed by each Member Company on an aggregate basis. (see Section 3.04 in the EFPIA Disclosure code)
 - Individual disclosures will reveal name of recipient, amount, date of transfer, type of relationship. Food and beverage costs are excluded.
- **METHOD OF DISCLOSURE:** The information will be published on our corporate website www.photocure.com regardless of the country the HCP/HCO has his/its main practice. There will also be a link from www.lmi.no to the specific page on our website. The information will be available to the public for 3 years.
- **WITHDRAWAL OF CONSENT:** The consent to publish can be withdrawn by the recipient at any time by contacting us at this address: info@photocure.no. In the event of a withdrawal the name will be removed from the website and the amount will be transferred to the aggregated amount as soon as possible and within 30 days at the latest.
- **RETENTION OF RECORDS:** Relevant records will be maintained for a minimum of 5 years
- **LANGUAGE OF DISCLOSURE:** English
- **CURRENCY:** All amounts will be in Euro
- **VAT INCL/NOT INCL:** It depends on the ToV

Read more here:
[www.efpia.eu/topic/
disclosure](http://www.efpia.eu/topic/disclosure)

