



MENARINI BENELUX N.V./S.A.

METHODOLOGICAL NOTE

LUXEMBOURG

As a member of the European Federation of Pharmaceutical Industries and associations (EFPIA) and the organization representing the originator pharmaceutical industry in Luxembourg, the Innovative Medicines for Luxembourg (IML), Menarini Benelux N.V./S.A. is fully committed to transparency and will according to the Code of Ethics of IML disclose all transfers of value (ToVs) that are made, directly or indirectly, for the benefit of Healthcare Professionals (HCPs), Healthcare Organisations (HCOs) and Patient Organisations (POs). In this context, the independence and integrity of the Healthcare Professionals, Healthcare Organisations and Patient Organisations are fully respected.

DATA REPORTED

Combined disclosure

The disclosure of Transfers of Value (ToV) is done under the responsibility of the Responsible Person for Information and Publicity (RIP) for all divisions of Menarini Benelux N.V./S.A. (combined in a single publication).

In addition, data from other companies of the Menarini Group will be collected as required.

Cross-border value transfers

The country of disclosure is determined by the address of principal practice for HCPs and the address of registration for POs and HCOs. If the beneficiary has a practice or a registered office in Luxembourg, the documentation and publication of the premiums and benefits must be done on the Menarini Benelux N.V./S.A. local website (regardless of where the company is established).

Disclosure platform and templates

The publication of ToVs to HCOs and HCPs is done on the Menarini Benelux N.V./S.A. website on a Standardised Disclosure Template “ANNEXE 2 - SCHEMA DE PUBLICATION DES TRANSFERTS DE VALEUR”.

Fees, payments and reimbursement of expenses for services and consultancy, financial support and other non-monetary support to Patient Organizations are subject to a separate disclosure. The publication of ToVs to POs is done on the same website on the Menarini BENELUX form “DISCLOSURE OF SUPPORT AND SERVICES TO PATIENT ORGANISATIONS”.



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Transfers of Value to be reported on the Annex 2 – Standardised Disclosure Template

Healthcare Professional	<ul style="list-style-type: none">- Contributions to the costs of participation to Scientific Events, such as:<ul style="list-style-type: none">o Registration fees;o Travel and Accomodation costs;- Fees, payment and reimbursement costs for services and consultancy.
Healthcare Organisation	<ul style="list-style-type: none">- Contributions to the cost of scientific Events, such as:<ul style="list-style-type: none">o Registration fees;o Travel and Accomodation costs;- Sponsorship agreements with HCOs or third parties appointed by HCOs to manage a Scientific Event;- Fees, payments and reimbursement of costs for services and consultancy;- Donations and grants that support Healthcare Organisations.

Transfers of Value to be reported on the Menarini BENELUX form “Disclosure of Support and Services to Patient Organisations

Patient Organisation	<ul style="list-style-type: none">- Fees, payments and reimbursement of expenses for services and consultancy;- Financial or other non-monetary support.
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Excluded Transfers of Value

- ToVs related solely to non-prescription medicines
- ToVs that are not listed in the list with the ToVs to be reported, such as:
 - o Objects of medical utility;
 - o Meals and beverages offered in the context of Scientific Events;
 - o Samples.

Consent management

Transfers of value to HCPs, HCOs and POs will be reported on an individual or an aggregated basis. In compliance with applicable data privacy regulations, the disclosure of personal data is dependent on the explicit consent of the HCP concerned.

Should an HCP not grant his/her consent for individual disclosure, then transfers of value to such an HCP will be reported on an aggregated basis.

In the written Agreement between Menarini Benelux N.V./S.A. and the HCP, consent is asked.

Transfers of value in the area of ‘Research and Development’ will always be reported on an aggregated level.

Reporting Period

ToVs and benefits are made public at the end of June following the calendar year in which they were awarded.

The reference year runs from 1 January to 31 December. Inclusion of a ToV in the report is done based on the date of payment.



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VAT/Other Tax Treatment and currency

All amounts reported are in Euro excluding VAT. If transactions require a conversion, the calculation will be applied when the transaction is done.

ToVs in case of partial attendances or cancellation by the HCP

If an HCP cancelled his/her attendance prior to an event, ToVs are not reported unless payments for registration or hospitality already occurred and are not refundable.

If an HCP attended only partially an event (e.g. congress), all ToVs that were actually paid by Menarini are reported.

Disclosure of ToVs related to Events cancelled

If an event has been cancelled by the organiser, the ToVs related to the event are disclosed if they can be attributed to a recipient. Planned ToVs for educational support to events are only disclosed if the recipient received the benefit. If the event has been cancelled and no ToV occurred to an individual then no disclosure is done. If an event has been converted from in-person to virtual and the recipient received a ToV via a virtual registration that ToV is disclosed.

Multi-year contracts

If ToVs are related to multi-year contracts, only the ToVs made in the reporting year are included in the reporting.

Disclosure period and Archiving

Menarini ToVs are published in accordance with the present document and with Article 36bis 1 of the IML Code of Ethics.

The relevant proof that Menarini Benelux N.V./S.A. has respected the disclosure obligations shall be retained for at least five years after the end of the relevant reporting period.

The disclosed data is available for public consultation on the Menarini Benelux N.V./S.A. website www.menarini.be for a period of three years (from the disclosure), then they are removed.

CONTACT DETAILS FOR MENARINI BENELUX

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