



Almirall spolka z ograniczona
odpowiedzialnoscia

POLAND

Methodological Note

2024

Almirall sp. z o.o.

Poland

Disclosure 2024

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1. Introduction

Interactions between healthcare companies and Healthcare Professionals (HCPs), Healthcare Organizations (HCOs) and Patient Organizations (Pos) are essential to establish and maintain the best possible supply of medicinal products. Almirall spolka z ograniczona odpowiedzialnosc, hereinafter called: **Almirall Poland** recognizes there is a growing expectation that such interactions must be conducted with integrity and must be transparent in order to create a better understanding of, and ultimately build trust in, the validity of industry interaction with the medical profession. Therefore, Almirall Poland supports the principle of transparency and complies with the local INFARMA and EFPIA (European Federation of Pharmaceutical Industries and Associations) Codes requirements for the disclosure of Transfers of Value (ToV) conducted in 2024 with Healthcare Professionals, Healthcare Organizations and Patient Organizations.

Almirall Poland made every effort to ensure all data required is disclosed and that it complies with all applicable laws, guidance and regulations. Almirall Poland expects that third parties and business partners apply equivalent standards in any professional activities conducted on its behalf.

2. Definitions

Contribution to costs related to events: is a support providing or covering the costs of meals, travel, accommodation and/or registration fees to support the attendance of an individual HCP or PO Representative to an event organized or created by any company of Almirall and/or a third party.

Donations and grants: collectively, mean providing funds, assets or services freely given for the purpose of supporting healthcare, scientific research or education, with no consequent obligation on the recipient to provide goods or services to the benefit of the donor in return.

Events: All professional, promotional, scientific, educational meetings, congresses, conferences, symposia, and other similar events (including, but not limited to, advisory board meetings, visits to research or manufacturing facilities, and planning, training or investigator meetings for clinical trials and non-interventional studies) organized or sponsored by or on behalf of any company of Almirall.

Fees for services and consultancy: ToVs resulting from or related to contracts between Almirall and any HCP or HCO under which such HCP or HCO provide any type of services to Almirall Poland.

Healthcare Organization (HCO): any legal entity (i) that is a healthcare, medical or scientific association or organization such as a hospital, clinic, foundation, university or other teaching institution or learned society whose business address, place of incorporation or primary place of operation is in Europe or (ii) through which one or more HCPs provide services.

Healthcare Professional (HCP): any natural person that is a member of the medical, dental, pharmacy or nursing professions or any other person who, in the course of his/her professional activities, may prescribe,

purchase, supply, recommend or administer a medicinal product and whose primary practice, principal professional address or place of incorporation is in Europe.

Patient Organization (PO): non-for-profit legal person/entity (including the umbrella organization to which it belongs), mainly composed of patients and/or caregivers, that represents and/or supports the needs of patients and/or caregivers and which business address, place of incorporation or primary place of operation is in Europe.

Research and Development: Transfers of Value to HCPs or HCOs related to the planning or conduct of (i) Non-clinical Studies (as defined in OECD Principles on Good Laboratory Practice); (ii) Clinical Trials (as defined in Regulation 536/2014); and (iii) Non-Interventional Studies (NIS) that are prospective in nature and that involve the collection of patient data from or on behalf of individual, or groups of, HCPs specifically for the study.

Sponsorship: is a support provided by or on behalf of Almirall Poland, when permitted by law, as a contribution to support an activity (including an Event) performed, organized or created by a HCO, a PO or a third party, and with a consequent obligation on the recipient to provide services in return.

3. Disclosure's scope

Products concerned

Disclosure applies to ToVs made in the context of activities which are completely or partially related to Prescription Only Medicines (POMs). Such activities comprise donations and grants, scientific and professional meetings (sponsorships, costs for registration, travelling and accommodation), services and consultancies (fees and related costs), and Research & Development.

Excluded ToVs

Disclosure does not apply to ToVs that are not mentioned in the previous section "Products concerned" such as ToVs that are: solely related to over-the-counter medicines, Items of medical utility, meals or medical samples among others.

ToVs date

All ToVs taking place in 2024 are disclosed to the best of our knowledge. For pending invoices related to events that took place during 2024, all invoices paid up to March 2025 have been included in the 2024 disclosure.

Direct ToVs

The disclosure includes ToVs made by Almirall Poland to Healthcare Professionals whose principal address is in Poland. In 2024 there were no ToV to Healthcare Organizations and Patient Organizations.

Indirect ToVs

Indirect ToVs provided to HCPs by third parties on behalf of Almirall Poland (e.g., travel agencies) are assigned to the according HCP and disclosed accordingly independent of the fact that the ToV was transferred on the bank account of the HCP or on the bank account of the third party. The third party will not be disclosed.

Non-Monetary ToVs

Disclosure of non-monetary transfers of value is made at the equivalent value in monetary terms. There were no non-monetary transfers of value that took place during the reporting period.

ToVs in case of partial attendances or cancellation and refund

There were no cases of partial attendance and therefore these have not been reported in the 2024 disclosure. ToVs that did not ultimately take place or were cancelled are not disclosed as no benefit was received by the HCP..

Cross-border activities

Where Almirall Global or any other Almirall affiliate engages with a Polish HCP, HCO or PO which results in a ToV the respective Almirall entity engaging the service is required to record the engagement in the Customer Relation Management (CRM) system to ensure that the transaction is captured for local disclosure purposes.

Research & Development

Costs that are subsidiary to these activities are included in the aggregate R&D category.

Almirall discloses payments agreed with universities and research centers for pre-clinical research as well as clinical trial agreements in HCOs (either direct payments or through a third-party), fees of independent professionals to provide research and development services, and investigator's meeting expenses.

Fees related to retrospective study work have been disclosed on an individual basis under the category "fees for services".

4. Specific considerations

Country unique identifier

Almirall Poland aims to maintain an up-to-date contact database which allows HCPs to have more than one practicing address associated with them, for example when an HCP works at different centers / hospitals etc. For the purposes of disclosure, the database utilized only recognizes one address - the principal practice address.

Self-incorporated HCP

Almirall Poland considers one-person legal entities owned by one HCP as HCP.

Multi-year agreements

Where agreements, sponsorships, studies and the like fall into more than one year, these are disclosed when any activity is performed, hence payment will be split over several years.

Quality Checks

Prior to reporting, Almirall internal processes ensure Transfer of Value made to HCP are correctly collected in Almirall.

Data quality checks are performed to ensure any HCP who has not provided consent for individual disclosure are reported in 'aggregate' and additional data and process monitoring takes place for quality assurance prior to reporting.

5. Data protection legal basis

Data were collected based on **Consent and Legitimate interest.**

6. Form of disclosure

Date of publication

ToVs are reported for one calendar year and disclosed in June of the following year.

Disclosure platform

The transparency report is available on the Almirall website and on INFARMA (local EFPIA) website. The annual report will remain three years on the website and all the related documentation is to be maintained for a minimum of 5 years.

Disclosure language

The transparency report is available in Polish and in English.

7. Disclosure financial data

Currency

All disclosed ToV data is reported in Polish zloty (PLN). ToVs provided in currencies other than PLN are converted to PLN using the exchange rate of the spend date. This is an automatic conversion that takes place in the Almirall Poland disclosure database.

VAT

VAT (Valued added Tax) generally is not included in the disclosure data. Where it applies, it may be different due to other countries or event requirements.

Calculation rules (e.g., in-kind ToVs)

Almirall Poland has not provided any benefits in kind to HCPs, HCOs and PO during 2024.

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