

IDORSIA PHARMACEUTICALS
VOLUNTARY EFPIA / FARMAINDUSTRIA DISCLOSURE:
SPAIN
METHODOLOGY NOTE APPLICABLE TO TRANSFERS OF
VALUE FOR VOLUNTARY EFPIA DISCLOSURE FOR
THE 2024 REPORTING YEAR

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I. INTRODUCTION

Transparency is fundamental to ensure a positive working relationship between the pharmaceutical industry and healthcare providers, relationships that best serve the interests of patients. Idorsia Pharmaceuticals is therefore committed to meet global transparency requirements, including the European Federation of Pharmaceutical Industries and Associations (EFPIA) Code of Practice in Europe. The code places a requirement on pharmaceutical companies to publicly report payments (transfers of value) made to health care professionals (HCP), health care organisations (HCO), and Patient Organisations (PO).

Idorsia is committed to transparency about how we operate as a business and about the relationships we have with HCPs, HCOs, and POs. Sharing information about these relationships in a straightforward and open way will, we hope, help explain the critical value these relationships bring to patient management.

The methodology note is a summary describing the methods used by Idorsia during the collection and publication of the transfers of value provided to HCPs, HCOs, POs.

According to the instruction from EFPIA such a note shall be published together with the annual report of transfers of value (ToV).

The reason for publishing a methodology note is so external recipients of the annual report may fully benefit from an informed reading of the report by understanding how data has been collected. Idorsia follows the local trade association instructions for disclosing transfers of value provided in the local industry codes. However, there are some details which trade associations and EFPIA leave to the individual companies to decide on. This note is primarily intended to answer those questions.

II. GENERAL QUESTIONS

1. DEFINITIONS

1.1. HEALTHCARE PROFESSIONAL (HCP)

Idorsia Pharmaceuticals has voluntarily adopted the definition as per the EFPIA Code of Practice.

An HCP is 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. The definition of HCPs includes: (i) any official or employee of a government, agency or other organisation (whether in the public or private sector) that may prescribe, purchase, supply, recommend or administer Medicinal Products and (ii) any employee of a Member Company whose primary occupation is that of a practising HCP

Idorsia Pharmaceuticals report will be based and dependant on reference data stored in Idorsia Pharmaceuticals systems and tools which are populated with data purchased from a Master

Database provider as well as data sourced internally.

1.2. HEALTHCARE ORGANISATION (HCO)

Idorsia Pharmaceuticals has adopted the definition as per the EFPIA Code of Practice.

An HCO is any legal person/entity (i) that is a healthcare, medical or scientific association or organisation (irrespective of the legal or organisational form) 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

1.3. Patient Organisation/Patient Advocacy Group (PO / PAG)

Idorsia Pharmaceuticals has adopted the definition as per the EFPIA Code of Practice.

A Patient Organisation is a non-for-profit legal person/entity (including the umbrella organisation to which it belongs), mainly composed of patients and/or caregivers, that represents and/or supports the needs of patients and/or caregivers and whose business address, place of incorporation or primary place of operation is in Europe

1.4. Transfer of Value (TOV)

Idorsia Pharmaceuticals has adopted the definition as per the EFPIA Code of Practice.

A Transfer of Value - Direct and indirect TOV - whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of prescription only medicine exclusively for human use.

Direct TOVs are those made directly by a Member Company for the benefit of a Recipient.

Indirect TOVs are those made on behalf of a Member Company for the benefit of a Recipient, or those made through a Third Party and where the Member Company knows or can identify the Recipient that will benefit from the Transfer of Value

2. CROSS-BORDER ENGAGEMENTS

Transfers of value paid from other Idorsia legal entities in other countries will be disclosed within the Spain report. The disclosure report includes transfers of values made to HCPs, HCOs, and POs who practice in the disclosure report country. This includes all transfers of value (direct and indirect) made by any Idorsia affiliates in the European countries included in the EFPIA disclosure code. For non EFPIA countries, Idorsia will make its best effort to collect and disclose direct transfers of value made by Idorsia affiliates.

3. CURRENCY

Where payments were made in a currency other than Euro, the exchange rate will mean the exact equivalent in Euro according to the date on which the conversion calculation was made (date of the payment).

All disclosures will be displayed in the euro (EUR), category totals are displayed in Euro and the local currency. The EUR totals will be calculated using the exchange rate on the day of payment

(<http://www.xe.com/>). Readers should understand that the total amounts disclosed in EUR could therefore vary slightly from the exact amount paid in the local currency; variations will be greater if there have been significant movements in exchange rate during the reporting period

4. TREATMENT OF VAT

Idorsia reports Transfers of Value as net (i.e. without value added tax or withholding tax unless the collection of net values is not possible through Idorsia's financial systems).

5. REPORTING OF TRANSFERS OF VALUE (TOV)

Direct transfers of value will be disclosed in the transfer of value period during which payment are invoiced irrespective of the contract date, contract duration or event date.

Indirect transfers of value will be disclosed with the date provided to Idorsia Pharmaceuticals by the intermediary. In the event that the payment date is not provided by the intermediary, then the event date is used.

6. TRANSFER OF VALUE CATEGORIES

EXPENSE CATEGORY	EXPENSE SUBCATEGORY	DESCRIPTION
Donations and Grants (HCOs Only)	N/A	Donations and grants to HCOs that support health care, including donations and grants (either cash or benefits in kind) to institutions, organisation or associations that are comprised of HCPs and/or that provide healthcare services. • Charitable contributions • Educational grants (e.g., fellowships, courses provided by an HCO where Idorsia does not select the individual HCPs participating) • Sponsoring of speakers/faculty which by nature of purpose and funding are classified under educational grants
Contribution To Costs Related To Events	Sponsorship agreements (HCOs only)	• Placement of a brand logo in a conference program or invitation communication in exchange for supporting the program • Funding an event in return for a display booth • Funding an event in exchange for advertising space • Satellite symposia at a congress • Any other activity qualified as "Corporate Sponsorship" • Sponsoring of speaker/faculty and sponsoring courses provided by an HCO which are qualified as "Corporate Sponsorship"
Contribution To Costs Related To Events	Registration Fees	Registration fees paid for the HCP/HCO to attend events
Contribution To Costs Related To Events	Travel & Accommodation	• Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking, shared ground transportation) • Accommodation
Fee for services and consultancy	Fees	Fees received in consideration for consultancy services and/or Transfers of Value resulting from or related to a contract between Idorsia and institutions, organisations or associations of HCPs under which such institutions, organisations or associations provide any type of services to Idorsia. This includes: • Speaker engagements • Advisory Boards

		• Study-related engagements • Medical writing • Data analysis • Development of education materials • General consulting / advising • Speaker training if linked to a speaker engagement
Fee for services and consultancy	Related Expenses	• Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking) • Accommodation
Research and Development	N/A	• Clinical Trials • Non-Interventional Studies that are prospective in nature • Investigators Initiated Research (IIR) • Investigator Sponsored Research (ISR) • Clinical & Research Collaboration

7. DATA PRIVACY

In accordance with applicable laws, rules, regulations and requirements relating to the privacy and security of Personal Data (as defined in the EU Data Protection Directive 95/46/EC or any replacement legislation), Idorsia shall obtain permission from the individual prior to disclosing personal data such as individual Transfers of Value. Idorsia has made every effort to secure the necessary permissions.

Where permission has not been obtained or where the individual HCP has refused permission, the Company has declared the total spend as an aggregate figure as a separate line entry within the relevant disclosure category

III. PUBLICATION

Idorsia Pharmaceuticals' report will remain publicly available for a period of 3 years.

Idorsia will submit and publish transparency disclosure reports in line with country timelines as defined by the trade association or government.