

Disclosure of Transfers of Value by Genesis Biopharma Romania SRL to healthcare professionals (HCPs) and healthcare organizations (HCOs)

METHODOLOGICAL NOTE

Genesis Biopharma Romania SRL (the "Company") discloses all Transfers of Value made towards HCPs and HCOs and the provided direct / indirect, financial / non-financial support to POs in accordance with the European Federation of Pharmaceutical Industries and Associations (EFPIA) Disclosure Code, the ARPIM Code on Disclosure of Transfers of Value from Pharmaceutical Companies to HCPs and HCOs and the ARPIM Code of Ethical Practice in the Interaction with Patient Organisations.

The published data represents the amount which was transferred to the corresponding HCO, PO or HCP within the calendar year 2019. The value was calculated based on costs incurred and is consistent with the described below methodology used in preparing the disclosures.

This document summarizes the approach taken in calculating the figures stated.

Definitions:

Healthcare Practitioner (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 or 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 Romania. For the avoidance of doubt, the definition of HCP includes:

- (i) any official or employee of a government agency or other organization (whether in the public or private sector) that may prescribe, purchase, supply or administer medicinal products and
- (ii) any employee of a member company whose primary occupation is that of a practicing HCP, but excludes
 - (x) all other employees of a Member Company and
 - (y) a wholesaler or distributor of medicinal products.

Healthcare Organization (HCO):

Any legal entity

(i) that is a healthcare, medical or scientific association or organization (irrespective of the legal or organizational form) such as a hospital, clinic, foundation, university or other teaching institution or learned society (except for patient organizations within the scope of the ARPIM PO Code) whose business address, place of incorporation or primary place of operation is in Romania or

(ii) through which one or more HCPs provide services.

PO: Patient non-profit organizations which operate in Romania (including umbrella organizations to which they belong). Their members are mainly patients and/or caregivers, people that represent and/or support the needs of patients and/or caregivers.

Recipient: Any HCP or HCO, as applicable, in each case, whose primary practice, principal professional address or place of incorporation is in Europe.

Transfers of Value: Direct and indirect Transfers of Value, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of generic or branded prescription-only Medicinal Products exclusively for human use. Direct Transfers of Value are those made directly by the company for the benefit of a Recipient. Indirect Transfers of Value are those made by a third party (such as contractors, agents, partners or affiliates - including foundations) on behalf of the company for the benefit of a Recipient, where the identity of the company is known to or can be identified by the Recipient.

Methodology:

1. All disclosures are presented in the local currency RON.
2. Disclosure has been made based on the Invoice and/or Deposit Proof.
3. The date taken into account for the purposes of the disclosure is the date of the legal document (invoice / depository, see above) for benefits actually paid during the calendar year 2019.
4. The disclosure of Transfers of Value is made either on an individual basis. In case of refusal or inability of HCP to attend an event or in case of cancellation of the event by HCO, the data are not subject to disclosure.
5. Transfers of Value that are disclosed and provided direct / indirect, financial / non-financial support to POs (where applicable):
 - Registration fees: includes event registration fees, VAT and other applicable fees where required
 - Travel: includes the cost of transport, including air ticket / train / bus tickets and transfers
 - Accommodation: Bed and breakfast, if the breakfast is included in the room rate, city taxes and tourist fees if any
 - Fees for Service and Consultancy Fees: include the gross amount paid (comprises the net amount plus any applicable taxes).
 - Donations and Grants to HCOs/POs - all costs that are part of the contract between the company and the health care organization/patient organisations, such as contributions to support initiatives in HCP education, healthcare systems and practices.
 - Sponsorship agreements with POs/ HCOs /third parties appointed by HCOs to manage an Event/Conference/Congress (commercial sponsorship) - the amount transferred to the HCO in return to which the company has received the opportunity to participate in the event (place for a booth, advertising and / or time for symposium), plus applicable tax.

