



METHODOLOGICAL NOTES FOR TRANSFERS OF VALUE (ToV) TO MEMBERS OF THE PUBLIC, PATIENTS AND JOURNALISTS

This document is a requirement of the Association of the British Pharmaceutical Industry (ABPI) code and represents payments made by Norgine and its affiliates to UK based Members of the Public, Patients and Journalists. It is to be read in conjunction with the public disclosure of ToVs for Members of the Public, Patients and Journalists listed on the following Norgine website: <https://norgine.com/transparency-public-declarations/>.

This document is reviewed yearly and updated to reflect changes in the methodology of reporting, if any.

These specific methodology notes are aligned to the ToVs made to Members of the Public, Patients and Journalists for the period 01 January 2024 to 31 December 2024.

1. Purpose of the Document

The purpose of this document is to guide the readers in understanding how Norgine derives, calculates and presents the amounts shown in its disclosure report for ToVs to Members of the Public, Patients and Journalists.

2. Definitions

Norgine adopts the following definitions for ToV relating to Members of the Public, Patients and Journalists, which are also reflected in its internal procedures.

- Member of the Public (MoP): a common or ordinary person within the general population. MoP is different from a healthcare professional but may include patients and journalists. This extends to individuals who may have retired from the profession but where their sphere of influence may still exist or be perceived and also Patients and Journalists.
- Patient: a person suffering or bearing with a medical condition and/or receiving or registered to receive medical treatment.
- Journalist: a person who writes news stories or articles for newspapers, magazine, or news websites or prepares news to be broadcast.
- Cross-border ToV: a ToV to a Member of the Public, Patient or Journalist that is registered outside the country where the Norgine affiliate who has provided the ToV is based.



- Reporting Period: 12-month cycle running from 1st January to 31st December of the preceding year that are publicly disclosed by June of the current year (e.g. 2025 disclosure report will typically cover ToV provided between 1 January 2024 and 31 December 2024).
- Transfers 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 all Norgine products, including products in development exclusively for human use:
 - Direct ToVs are those made directly by Norgine for the benefit of a MoP, Patient or Journalist.
 - Indirect ToVs are those made on behalf of Norgine for the benefit of a MoP, Patient or Journalist, or those made through a Third Party and where Norgine knows or can identify the Recipient that will benefit from the ToV.

3. Public Disclosure

The Members of the Public, Patients and Journalists disclosure report is published towards the end of June on a yearly basis and covers the 12-month period running from 1st January to 31st December of the preceding year. The year it relates to is prominently mentioned at the top of the transparency disclosure report.

ToVs to Members of the Public, Patients and Journalists are published annually on the following Norgine website: <https://norgine.com/transparency-public-declarations/>.

4. Data Retention

No personal data is provided in the ToV disclosure relating to Members of the Public, Patients and Journalist, as the amounts paid are anonymous.

The anonymised data is kept visible for a minimum of three years on Norgine's corporate website as per the requirements of the ABPI. The underlying data is retained by Norgine for no longer than is necessary for which the personal data are processed in line with article 5.1.e) UK and EU GDPR. This underlying data is retained on Norgine's information systems for a minimum of 5 years to ensure compliance with our legal obligations.

5. Understanding Values And Calculations Within The Report

- Layout of the Report

The ToV Report splits out the ToV for Members of the Public, Patients and Journalists in to separate sections. Each of these sections is further split into three: individual description of service (one row per individual Member of the Public, Patient or Journalist and anonymised);



Aggregate amount attributable to transfer of value to such recipients (total of the individual description of services rows); Number of Recipients in aggregate disclosure (total number of individual Members of the Public, Patients and Journalists).

For each row in the report the Contracted Services values are listed in GBP and are split between Fees and Out of Pocket/expenses with a total value provided at the end of the row.

- Transaction Date versus Service Delivery Date

Norgine handles and declares the ToV from the time of payment to the Members of the Public, Patients and Journalists, i.e. the transaction date, rather than when the service, interaction or event actually occurred. This means that there could be some instances where the ToV undertaken in one Reporting Period are reported in the next Reporting Period, and vice versa. ToV are always paid after the engagement has taken place.

- Management of Multi-Year Contracts

In a similar spirit to the above point, where projects run for several years, Norgine declares the amount paid relevant to the year in which each part of the payment was made. For example, a project that spans 2 calendar years and includes several individual ToVs during that time will have two associated disclosures (i.e. one for each calendar year showing the value of the ToV made in the specific calendar year).

- VAT

Amounts typically exclude VAT and recoverable local taxes.

Expenses related to an event or meeting (travel, accommodation, taxi) may include VAT or local taxes where applicable. VAT, if included, is the national VAT of the country where the spend is incurred.

- Handling of Currency and Exchange Rates

The values in the disclosure template are expressed in GBP.

Where values had to be converted into GBP from another currency, the exchange rate used is clearly stated in individual declaration report.

- Cross-Border Payments

Norgine has Affiliates in many countries within and outside the European Union, and cross-border ToVs are disclosed in the local currency of the country where the Member of the Public, Patient or Journalist is based.



6. Further Information

Any questions or suggestions regarding the content of this document should be addressed to contact@norgine.com.