

IDORSIA PHARMACEUTICALS

VEREIN FREIWILLIGE SELBSTKONTROLLE FÜR DIE
ARZNEIMITTELINDUSTRIE – FSA DISCLOSURE:
GERMANY

METHODOLOGY NOTE APPLICABLE TO TRANSFERS OF
VALUE FOR FSA DISCLOSURE FOR THE 2023
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, and Verein Freiwillige Selbstkontrolle Für Die Arzneimittelin-Dustrie (FSA) Code of Transparency. The codes place 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 FSA 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 FSA Code of Transparency. European-based and full-time physicians and pharmacists, as well as any member of the medical, dental, pharmaceutical or other nursing professions who in the course of their professional activities are authorised to prescribe, recommend or use or lawfully trade in medicinal products for human use. This also includes employees of public authorities or employees of the funders responsible at that body for prescribing, procuring, supplying, administering or deciding on the reimbursement of medicines, as well as employees of the member companies who, in addition to working for the company, practise full-time as physicians, pharmacists or other HCPs. It excludes, however, all other employees of a member company, wholesaler or other person trading with pharmaceuticals.

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 FSA Code of Transparency.

An HCO is any medical or scientific institution or association based in Europe, irrespective of its legal entity, comprising healthcare professionals (e.g. medical learned societies) and/or provides or conducts medical services or research through them (e.g. hospitals, university clinics or further training and research institutions). This also includes institutions through which HCPs render their services (such as consulting firms), irrespective of what position or function the healthcare professionals assume in these organisations. Independent contract research institutes which are not composed of prescribing healthcare professionals or are connected with medical facilities (e.g. clinical research facilities (CROs)), shall be covered as HCOs by the Code only if member companies provide transfers of value to recipients within the meaning of the Code through such institutions (referred to as "pass-through costs").

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

Idorsia Pharmaceuticals has adopted the definition as per the FSA Code of Conduct Patient Organisations.

A Patient Organisation is voluntary non-profit organisations of patients and /or their families, whose activities involve group support in coping with diseases, disseminating information about diseases and therapy options, lobbying in healthcare and social policy, publishing of media to inform and support patients and/or providing advisory services.

1.4. Transfer of Value (TOV)

Idorsia Pharmaceuticals has adopted the definition as per the FSA Code of Transparency.

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 German FSA 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. <ul style="list-style-type: none"> • 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)	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking) • Accommodation
Research and Development	N/A	<ul style="list-style-type: none"> • 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.