Novartis Methodological Note

on Disclosure of Payments and other Transfers of Values to Health Care Professionals and Health Care Organizations following the ‘EFPIA Code on Disclosure of Transfers of Value’ and/or ‘MedTech Europe Code of Ethical Business Practice’

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1. Reference to National Transparency Laws and Regulations

Novartis supports laws and regulations that promote transparency around relationships between healthcare companies, Healthcare Professionals (HCPs) and Healthcare Organizations (HCOs) associated with Transfers of Value (ToVs) related to prescription-only medicines by establishing a single, consistent transparency standard in Europe for disclosing ToVs across its divisions and European countries, by following the EFPIA transparency requirements and requirements set in local transparency laws.

Alcon Cyprus also complies with the obligation to collect, disclose and report ToVs related to educational grants to HCOs/PCOs (Professional Conference Organizer) in accordance with the The MedTech Europe Code of Ethical Business Practice On Disclosure Of Transfers Of Value From Medical Device Companies To Healthcare Organization and Professional Conference Organizer.

2. Purpose of the Methodological Note

This document is intended to serve as supporting documentation for the 2018 Cyprus Disclosure Report. Alcon Cyprus’s position is based on the interpretation of the current version of the EFPIA Disclosure Code, MedTech Disclosure Code aligned with local transparency laws.

The Methodological Note summarizes the disclosure recognition methodologies and business decisions as well as country specific considerations applied by Alcon Cyprus in order to identify, collect and report ToVs for each disclosure category as described in Section 3.01 of the EFPIA Disclosure Code and Chapter 4, section 3 of the Medtech Disclosure Code.

3. Novartis’ Commitment and Responsibility for Disclosure

Novartis supports laws and regulations that promote transparency around relationships between healthcare companies and HCPs/HCOs associated with ToVs related to prescription-only medicines, OTC medicines and food supplements and medical devices.

Novartis establishes a single, consistent transparency standard for disclosing ToVs in all EFPIA countries.
4. Scope of the Novartis’ Disclosure on Transfers of Value

This 2018 Cyprus affiliate Disclosure Report is following the disclosure standards pursuant to the local transposition of EFPIA Disclosure Code, MedTech Disclosure Code and national transparency laws/regulations. Subject to this disclosure report are all direct or indirect ToVs related to prescription-only medicines, OTC medicines and food supplements and medical devices disclosed by Alcon Cyprus to or for the benefit of a Recipient made by any Novartis affiliate as described in Article 3 of the EFPIA Disclosure Code and ToVs for educational grants described in Chapter 4, Section 3 of the MedTech Disclosure code. Further details on the disclosure scope will be provided in chapter 4 of this document.

The legal definition of ‘prescription-only medicine’ is pursuant to the medical product which is a subject to a medical prescription. ToVs related to a group of products that includes prescription-only medicines (e.g. combination products/diagnostics and medicinal products) are reported in total following the disclosure requirements of the EFPIA Disclosure Code.

In summary:

- The 2017 Cyprus EFPIA Disclosure Report covers direct and indirect ToVs, payments, in kind or otherwise, made to HCPs/HCOs in connection with the development and sale of prescription-only medicinal products, OTC medicines and food supplements exclusively for human use, whether for promotional purposes or otherwise.

- The 2017 Cyprus MedTech Disclosure Report covers provision of funds for the support and the advancement of genuine medical education of HCP, patients and/or the public on clinical, scientific and/or health care topics relevant to the therapeutic areas as educational grants.

In this report, Alcon Representative Office, Bosnia discloses the amounts for Cyprus of value transferred by type of ToVs with data coverage from January 1\textsuperscript{st} 2017 to December 31\textsuperscript{st} 2017. Alcon Cyprus disclosure is performed for the full calendar year 2017.

No Transfer of Values are reportable for Alcon Cyprus for the disclosure cycle 2018.