

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'

Country: Cyprus

Division: Sandoz

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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)¹ 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.

As a Novartis Company Sandoz Cyprus complies with the obligation to collect, disclose and report ToVs related to prescription-only medicines to HCPs/HCOs in accordance with the:

- EFPIA Code On Disclosure Of Transfers Of Value From Pharmaceutical Companies To Healthcare Professionals And Healthcare Organizations²

In addition, Sandoz Cyprus is also disclosing ToVs related to OTC medicines and food supplements.

2. Purpose of the Methodological Note

This document is intended to serve as supporting documentation for the 2018 Sandoz Cyprus affiliate Disclosure Report. Sandoz Cyprus' position is based on the interpretation of the current version of the EFPIA Disclosure Code.

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

¹ A definition on the terms "HCP/HCO" and "ToVs" is provided in chapter 9 of this document.

² The EFPIA Code On Disclosure Of Transfers Of Value From Pharmaceutical Companies To Healthcare Professionals And Healthcare Organization (in short: EFPIA Disclosure Code) states in Section 3.05 (*Methodology*) that "each Member Company shall publish a note summarizing the methodologies used by it in preparing the disclosures and identifying Transfers of Value for each category described in Section 3.01. The note, including a general summary and/or country specific considerations, shall describe the recognition methodologies applied, and should include the treatment of multi-year contracts, VAT and other tax aspects, currency aspects and other issues related to the timing and amount of Transfers of Value for purposes of this Code, as applicable".

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.

Novartis establishes a single, consistent transparency standard for disclosing ToVs in all EFPIA countries.

4. Scope of the Novartis' Disclosure on Transfers of Value

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

This 2018 Sandoz Cyprus Disclosure Report is following the disclosure standards pursuant to the local transposition of EFPIA 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 disclosed by Sandoz Cyprus to or for the benefit of a Recipient made by any Novartis affiliate as described in Article 3 of the EFPIA Disclosure. 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 EFPIA Disclosure Code. 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 2018 Sandoz Cyprus EFPIA Disclosure Report or local name of the 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.

In this report, Sandoz Cyprus discloses the amounts of value transferred by type of ToVs with data coverage from January 1st 2018 to December 31st 2018. Sandoz Cyprus disclosure is performed for the full calendar year 2018.

Whenever possible, Sandoz Cyprus follows the principle of disclosure on individual HCP/HCO level, to ensure that each Recipient is referred to in such a way that there is no doubt as to the identity of the HCP/HCO benefitting from the ToVs. Aggregate disclosure

for non Research and Development ToVs is only used in exceptional cases, e.g. if consent could not be obtained despite best efforts or in case of withdrawal of consent.