

DISCLOSURE OF TRANSFERS OF VALUE TO HEALTHCARE PROFESSIONALS AND HEALTHCARE ORGANISATIONS

METHODOLOGICAL NOTES

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INTRODUCTION

Pharma Mar S.A. is a member of the European Bio-pharmaceutical Enterprises (EBE), a specialized group of research-based pharmaceutical companies within EFPIA (European Federation of Pharmaceutical Industries and Associations). As such, Pharma Mar S.A. is bound by the EFPIA Code on Disclosure of Transfers of Value from Pharmaceutical Companies to Healthcare Professionals and Healthcare Organizations ^[1], to disclose any amount attributable to Transfers of Value to Healthcare Professionals and Healthcare Organizations in each Reporting Period.

EFPIA Code of Disclosure Transfers of Value ^[1] states on Section 3.05. that together with the template describing the Transfers of Value, each Member Company shall publish a note summarizing the methodologies used by it in preparing the disclosures and identifying the Transfers of Value. 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 the Code.

CONTENT

1. General Summary & Country considerations

This methodological note is referred to any Transfer of Value made in 2015 in Hungary or Sweden

Pharma Mar S.A. did not have subsidiaries in Hungary or Sweden during 2015, thus all the commercial activities conducted with Pharma Mar's products in those countries were carried out by our partner Swedish Orphan Biovitrum AB (SOBI). SOBI conducts all the marketing and promotional activities related to Yondelis[®], according to EFPIA Code of Practice or to the applicable Local Code of Ethics, and therefore shall perform the obligations of documentation and

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disclosure of the relevant Transfers of Value to Healthcare Professionals and Healthcare Organizations in their territory of operations for the calendar year 2015.

Nevertheless, Pharma Mar S.A will declare by its own, the Transfers of Value related to Research & Development that can be clearly linked to activities as defined on the Art 3.04 & Schedule 1 of the EFPIA Code on Disclosure of Transfers of Value ^[1]. For the purpose of correct identification of the criteria used in the declaration of Transfers of Value included in the category of Research and Development it is noted that the declared amount corresponds to that declared to the Spanish Ministry of Industry, Energy and Tourism, within the " PROFARMA Plan (2013-2016) for the Development of Competitiveness in the Pharmaceutical Industry", specifically, the amount declared under the category "R & D Expenses Outside-Walls".

2. Other issues and criteria applied

To the best of Pharma Mar's knowledge, the following criteria have been used to compile and summarize the information.

- Amounts are disclosed in Euros, and do not include VAT.
- All the amounts disclosed correspond to Transfers of Value that took place exclusively during 2015

ABBREVIATIONS

EFPIA: European Federation of Pharmaceutical Industries and Associations

EBE: European Bio-pharmaceutical Enterprises (EBE)

HCO: Healthcare Organization (for a complete definition of the term you may refer to the EFPIA Code on Disclosure of Transfers of Value from Pharmaceutical Companies to Healthcare Professionals and Healthcare Organizations, Schedule 1 Definition of terms)

HCP: Healthcare Professional (for a complete definition of the term you may refer to the EFPIA Code on Disclosure of Transfers of Value from Pharmaceutical Companies to Healthcare Professionals and Healthcare Organizations, Schedule 1 Definition of terms)

HCP Code: EFPIA Code on the Promotion of Prescription-Only Medicines to, and Interactions with, Healthcare Professionals, adopted by the EFPIA Board.

REFERENCES

[1] EFPIA European Federation of Pharmaceutical Industries and Associations, «Responsible Transparency,» 2016. [En línea]. Available: <http://transparency.efpia.eu/>. [Último acceso: 29 02 2016].