

# Almirall AG

## Methodological Note

### 2024

# Almirall AG

## Disclosure 2024

1. Introduction
  2. Definitions
  3. Disclosure's scope
  4. Specific considerations
  5. Data protection legal basis
  6. Form of disclosure
  7. Disclosure financial data
  8. Additional information
- 

### 1. Introduction

Interactions between healthcare companies and Healthcare Professionals (HCPs), Healthcare Organizations (HCOs) and Patient Organizations (POs) are essential to establish and maintain the best possible supply of medicinal products. Almirall AG recognizes there is a growing expectation that such interactions must be conducted with integrity and must be transparent in order to create a better understanding of, and ultimately build trust in, the validity of industry interaction with the medical profession. Therefore, Almirall AG supports the principle of transparency and complies with the local and EFPIA (European Federation of Pharmaceutical Industries and Associations) Codes requirements for the disclosure of Transfers of Value (ToV) conducted in 2024 with Healthcare Professionals, Healthcare Organizations and Patient Organizations.

Almirall AG made every effort to ensure all data required are disclosed and that it complies with all applicable laws, guidance and regulations. Almirall AG expects that third parties and business partners apply equivalent standards in any professional activities conducted on its behalf.

## 2. Definitions

**Contribution to costs related to events:** is a support providing or covering the costs of meals, travel, accommodation and/or registration fees to support the attendance of an individual HCP or PO Representative to an event organized or created by any company of Almirall and/or a third party.

**Donations and grants:** collectively, mean providing funds, assets or services freely given for the purpose of supporting healthcare, scientific research or education, with no consequent obligation on the recipient to provide goods or services to the benefit of the donor in return.

**Events:** All professional, promotional, scientific, educational meetings, congresses, conferences, symposia, and other similar events (including, but not limited to, advisory board meetings, visits to research or manufacturing facilities, and planning, training or investigator meetings for clinical trials and non-interventional studies) organized or sponsored by or on behalf of any company of Almirall.

**Fees for services and consultancy:** ToVs resulting from or related to contracts between Almirall and any HCP or HCO under which such HCP or HCO provide any type of services to Almirall.

**Healthcare Organisation (HCO):** any legal entity (i) that is a healthcare, medical or scientific association or organization such as a hospital, clinic, foundation, university or other teaching institution or learned society whose business address, place of incorporation or primary place of operation is in Europe or (ii) through which one or more HCPs provide services. The definition of HCO also includes any private agencies or organizations that provide by their own medical training to HCPs.

**Healthcare Professional (HCP):** any natural person that is a member of the medical, dental, pharmacy or nursing professions or any other person who, in the course of his/her professional activities, may prescribe, purchase, supply, recommend or administer a medicinal product, or provide medical training services to HCPs, and whose primary practice, principal professional address or place of incorporation is in Europe.

**Patient Organisation (PO):** non-for-profit legal person/entity (including the umbrella organisation to which it belongs), mainly composed of patients and/or caregivers, that represents and/or supports the needs of patients and/or caregivers and which business address, place of incorporation or primary place of operation is in Europe.

**Research and Development:** Transfers of Value to HCPs or HCOs related to the planning or conduct of (i) Non-clinical Studies (as defined in OECD Principles on Good Laboratory Practice); (ii) Clinical Trials (as defined in Regulation 536/2014); and (iii) Non-Interventional Studies (NIS) that are prospective or retrospective in nature and that involve the collection of patient data from or on behalf of individual, or groups of, HCPs specifically for the study.

**Sponsorship:** is a support provided by or on behalf of Almirall, when permitted by law, as a contribution to support an activity (including an Event) performed, organized or created by a HCO, a PO or a third party, and with a consequent obligation on the recipient to provide services in return

### 3. Disclosure's scope

#### Products concerned

Disclosure applies to ToVs made in the context of activities which are completely or partially related to Prescription Only Medicines (POMs). Such activities comprise donations and grants, scientific and professional meetings (sponsorships, costs for registration, travelling and accommodation), services and consultancies (fees and related costs), and Research & Development.

#### Excluded ToVs

Disclosure does not apply to ToVs that are not mentioned in the previous section "Products concerned" such as ToVs that are: solely related to over-the-counter medicines, Items of medical utility, meals or medical samples among others.

#### ToVs date

All ToVs taking place in 2024 are disclosed to the best of our knowledge (any data relating to 2024 which was available up to June 2025 was included in this report). For pending invoices related to events that took place during 2024, all invoices paid up to June 2025 have been included in the 2024 disclosure.

#### Direct ToVs

The disclosure includes ToVs made by Almirall to Healthcare Professionals whose principal address is in Austria and to Healthcare Organizations and Patient Organizations which social address is in Austria.

#### Indirect ToVs

Indirect ToVs provided to HCPs or HCOs by third parties on behalf of Almirall (e.g., travel agencies) are assigned to the according HCP or HCO and disclosed accordingly independent of the fact that the ToV was transferred on the bank account of the HCP/HCO or on the bank account of the third party. The third party will not be disclosed.

#### Non-Monetary ToVs

Disclosure of non-monetary transfers of value is made at the equivalent value in monetary terms. No non-monetary transfers of value took place during the reporting period.

#### ToVs in case of partial attendances or cancellation and refund

ToVs that did not ultimately take place or were cancelled are not disclosed as no benefit was received by the HCP, HCO or PO.

#### Cross-border activities

Where Almirall Global or any other Almirall affiliate engages with a Austrian HCP, HCO or PO which results in a ToV; the respective Almirall entity engaging the service is required to record the engagement in the Customer Relation Management (CRM) system to ensure that the transaction is captured for local disclosure purposes.

## Research & Development

Costs that are subsidiary to these activities are included in the aggregate R&D category.

Almirall discloses payments agreed with universities and research centers for pre-clinical research as well as clinical trial (interventional and non-interventional, prospective and retrospective) agreements in HCOs (either direct payments or through a third-party), fees of independent professionals to provide research and development services, and investigator's meeting expenses.

## 4. Specific considerations

### Country unique identifier

Almirall AG aims to maintain an up-to-date contact database which allows HCPs to have more than one practicing address associated with them, for example when an HCP works at different centers / hospitals etc. For the purposes of disclosure, the database utilized only recognizes one address - the principal practice address.

### Self-incorporated HCP

Almirall AG considers legal entities with self-incorporated HCPs as an HCO.

### Multi-year agreements

Where agreements, sponsorships, studies and the like fall into more than one year, these are disclosed when any activity is performed, hence payment will be split over several years.

### Country specificities

Not applicable.

### Quality Checks

Prior to reporting, Almirall internal processes ensure Transfer of Value made to HCP, HCO or PO are correctly collected in Almirall.

Data quality checks are performed to ensure any HCP (HCO as appropriate) who has not provided consent for individual disclosure are reported in 'aggregate' and additional data and process monitoring takes place for quality assurance prior to reporting.

## 5. Data protection legal basis

**Consent collection:** In the spirit of transparency and in compliance with Data Privacy requirements Almirall has ensured each agreement with an HCP or HCO includes a separate document for the individual to consent to either individual or aggregate disclosure, which is requested for each activity.

**Consent withdrawal:** The consent management system enables amendment from individual to aggregate or vice versa in the database. This is done upon receipt of a signed individual consent, or a revoke of an individual

consent, both in writing to Almirall. If an HCP or HCO requests clarification or changes of the disclosed data or consent status Almirall will act on the request as appropriate, reply to the HCP/HCO with the clarification requested or that the change has been implemented. The written message letter from the HCP/HCO will serve as proof of withdrawal of consent. Disputes on the value of the ToV disclosed will be resolved as quickly as possible, and the disclosed data amended where possible and required.

**Partial Consent:** Almirall collects consent on a per activity basis. Almirall has disclosed each ToVs according to the HCP/ HCOs consents. Therefore, an individual recipient may have ToVs disclosed in both, individual and aggregate categories.

## 6. Form of disclosure

### Date of publication

ToVs are reported for one calendar year and disclosed in June of the following year.

### Disclosure platform

The transparency report is available on the Almirall website. The annual report will remain three years on the website and all the related documentation is to be maintained for a minimum of 5 years.

### Disclosure language

The transparency report is available in English.

## 7. Disclosure financial data

### Currency

All disclosed ToV data is reported in CHF. ToVs provided in currencies other than CHF are converted to CHF using the exchange rate of the spend date. This is an automatic conversion that takes place in the Almirall disclosure database.

### VAT

VAT (Valued added Tax) is included in the disclosure data if the ToV was paid with VAT. Where applies, it may be different due to other country or event requirements.

### Calculation rules (in-kind ToVs)

Almirall AG has not provided any benefits in kind to HCPs, HCOs and PO during 2024.

## 8. Additional information

Not applicable.

- End -