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**ALVOGEN'S OVERALL APPROACH TO  
TRANSPARENCY AND DISCLOSURE CODES  
SELF-CERTIFICATION SCHEME**

## Alvogen's Overall Approach to Transparency and Disclosure Codes Self-Certification Scheme

Alvogen works with healthcare professionals (HCPs) and healthcare organisations (HCOs) who provide the Company and Pharmaceutical Industry (Industry) as a whole with valuable, independent, and expert knowledge derived from their clinical and managerial experience. In addition, throughout the lifecycle of a medicinal product, pharmaceutical companies are in a unique position as experts of their products to also be a resource to the healthcare systems and providers. These collaborations are essential in addressing patient needs and include a range of activities (e.g., providing medical education, clinical research, sharing best medical practices, exchanging information on how new medicines fit into the patient pathway).

The United States and certain European and Asian countries have adopted codes and guidelines to ensure that interactions with HCPs and HCOs meet the highest standards of integrity and transparency. Building greater transparency into the relationships between the industry and, HCPs and HCOs, aims to build a more robust understanding of the collaboration and recognition of its value to patient care.

Alvogen complies with transparency disclosure obligations as required by local laws and regulations, or by the EFPIA Disclosure Code, in all applicable countries.

Alvogen hereby confirms that its Disclosure Reports include transfers of value (ToV) made in 2018, from the Company to HCPs and HCOs, conforming with local laws and regulations and the EFPIA Disclosure Code. The Company applied the following key principles when aggregating ToV and developing Disclosure Reports:

### Disclosure quality

Alvogen certifies that:

- Its disclosures are made in each applicable country where it operates;
- Its disclosures include direct and indirect ToV, as defined in the local laws, regulations, codes, and guidance issued by EFPIA; and,
- Its methodology description includes the process it has followed in order to compile the data hereby disclosed.

### Methodology used for collecting and organizing ToVs in line with applicable local laws, regulations, codes, and EFPIA Disclosure Code requirements.

Alvogen certifies that:

- Data collection complies with the requirements of local laws, regulations, codes, and EFPIA Disclosure Code requirements;
- Actions were taken to seek consent from HCPs and HCOs, where applicable.

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<sup>1</sup> Including for Physician Payments Sunshine Act in the United States

<sup>2</sup> EFPIA Disclosure Code for Healthcare professionals and organisations transfers of value pertaining to activities done on behalf of Company Members, more specifically in the context of Alvogen distribution agreement with Pfizer on prescription only medicine in select countries.

**Aggregate disclosures are limited to ToVs for Research and Development and those that cannot be made on an individual basis for legal reasons because consent to disclose ToVs were not obtained from HCPs and HCOs.**

Alvogen certifies that aggregate disclosures are limited to the following:

- Research and Development ToVs;
- ToVs to Recipients for which consent of individual disclosure has not been obtained.

**Data quality and integrity**

Alvogen has policies and procedures governing how, and under what circumstances, payments or other exchanges of value may be made to HCPs and HCOs, including how these activities and payments are to be captured within Alvogen's financial systems.

The process to provide Disclosure Reports requires data extraction from several transactional systems and the implementation of manual data collection across Alvogen. The electronic and manual data retrieval processes are complex and rely on employees' adherence to current policies and third-party vendors providing accurate data. Each Alvogen employee who initiates an HCP or HCO related payment is responsible for adhering to established processes which outline appropriate documentation and expense classification. Business process owners for each transaction types (e.g., speaker programs, consulting) must also execute their duties, including ensuring processes are followed, reporting any known violations, and correcting known errors or misclassifications as soon as possible. The processes and responsibilities for these frontend requirements are outlined in Alvogen Compliance Handbook.

Alvogen local country management teams are accountable for ensuring that data is accurate, appropriately extracted, and posted to Alvogen's global website ([www.alvogen.com](http://www.alvogen.com)) or on a central national platform .

ToVs were not recorded in Estonia, Latvia, Lithuania and Ukraine in 2018, and therefore, no additional information for these countries will be provided.

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<sup>1</sup>Bulgaria, Croatia, Poland and Serbia

<sup>2</sup>United States on [www.cms.gov/openpayments](http://www.cms.gov/openpayments), Hungary on [https://patika.keri.hu/keri\\_transz/](https://patika.keri.hu/keri_transz/) and Romania on [www.anm.ro/medicamente-de-uz-uman/publicitate/sponsorizari-medicamente-de-uz-uman/](http://www.anm.ro/medicamente-de-uz-uman/publicitate/sponsorizari-medicamente-de-uz-uman/)