**EFPIA PATIENT ORGANISATION DISCLOSURE METHODOLOGICAL NOTE**

**PIERRE FABRE GROUP**

**Transfers of Value 2019 -**

**Publication December 2020**

CONTENTS

[1. PREAMBLE 3](#_Toc53671238)

[2. PURPOSE 4](#_Toc53671239)

[3. ABBREVIATIONS 4](#_Toc53671240)

[4. SCOPE OF DISCLOSURE 4](#_Toc53671241)

[4.1. Recipient 4](#_Toc53671242)

[4.2. Transfers of Value: Definition and categories 5](#_Toc53671243)

[4.2.1. ToVs: Definition 5](#_Toc53671244)

[4.2.2. ToVs: Catégories 5](#_Toc53671245)

[5. PREPARATION OF THE PUBLICATION OF TRANSFER OF VALUE 6](#_Toc53671246)

[5.1. Principle 6](#_Toc53671247)

[5.2. Cross-border activities 6](#_Toc53671248)

[5.3. Publication 6](#_Toc53671249)

[5.4. Date of Publication 7](#_Toc53671250)

[5.5. Disclosure language 7](#_Toc53671251)

[5.6. Disclosure currency 7](#_Toc53671252)

[5.7. Archivage 7](#_Toc53671253)

[6. MANAGEMENT OF RECIPENT’S REQUEST 7](#_Toc53671254)

# PREAMBLE

Patient Organisations provide a powerful voice for patients across Europe. They aim at improving the quality of life of people who suffer from diseases. They are an emotional support for patients, they help them and their loved ones to better understand their illness and their care. Pierre Fabre is very committed to acting with the patients and helping them to improve their everyday life. This is the reason why our group supports Patient Organizations in their various activities while ensuring their independence is never compromised. By putting patients at the center of everything we do, we create support solutions that meet the real needs of patients and can help improve their lives.

In accordance with our commitment to integrity, transparency and as member of EFPIA, Pierre Fabre group wants to ensure we meet those expectations complying with the article 24 of the EFPIA Code of Practice.

The EFPIA Disclosure Code is a code of conduct that requires all EFPIA member companies and companies that are members of EFPIA member associations to disclose transfers of value to Patient Organizations (Pos).

This is the first Patient Organisation disclosure. This publication concerns POs supports made in 2019 for all Pierre Fabre Affiliates which are in the EFPIA scope or not. The disclosure is published on the company’s corporate website. Some details as the approach to timing, tax and currency aspects of Transfer of Value (ToV) disclosure are not defined by the EFPIA Code.

This document summarizes the methodology used in preparing Pierre Fabre disclosure report on transfers of value to Patient Organisations.

Pierre Fabre, as a member of EFPIA, fulfills this requirement by publishing this document alongside 2019 transparency disclosure reports where is possible. All data in the disclosure report were correct at time of publication.

# PURPOSE

In accordance to the article 24 of the EFPIA Code, this document is used as required methodological note, and describes the Patient Organisation EFPIA Disclosure Code requirements. This Methodological note applies to PIERRE FABRE GROUP.

# ABBREVIATIONS

|  |  |
| --- | --- |
| ToV | Transfer of Value |
| Cross-border ToV | Cross-border Transfers of Value |
| EFPIA | European Federation of Pharmaceuticals Industries and Associations |
| PO | Patient Organisations |

# SCOPE OF DISCLOSURE

## Recipient

* *EFPIA Definition*

“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.”

* *Pierre Fabre Group*

Pierre Fabre Group is fully aligned to the EFPIA Code of Practices requirements.

## Transfers of Value: Definition and categories

### ToVs: Definition

Direct and indirect ToV, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of POM exclusively for human use. Direct ToVs are those made directly by a Member Company for the benefit of a Recipient. Indirect ToVs are those made on behalf of a Member Company for the benefit of a Recipient, or those made through a Third Party and where the Member Company knows or can identify the Recipient that will benefit from the Transfer of Value.

### ToVs: Categories

* *EFPIA Definition*

Transfer of Value (ToV): Financial support and/or significant indirect/non-financial support provided to a Patient Organization:

* + *For supports:*

 the monetary value of financial support and of invoiced costs,

- the non-monetary benefit that the PO receives when the non-financial support cannot be assigned to a meaningful monetary value.

* + *For contracted services:*

- the total amount paid per PO over the Reporting Period.

- A description of the nature of the support or services provided that is sufficiently complete to enable the average reader to form an understanding of the nature of the support or the arrangement without the necessity to divulge confidential information.

* *Pierre Fabre Group*

Pierre Fabre Group is fully aligned the EFPIA Code of Practices requirements.

# PREPARATION OF THE PUBLICATION OF TRANSFER OF VALUE

## Principle

To prepare the publication, each transfer of value is collected from all Pierre Fabre Group). The information required for the disclosure is in accordance with the GDPR: name of the Patient Organisation, country of exercise, nature and description of the activity, agreement type and amount.

**Data Collection Data Aggregation Disclosure**

**Pierre Fabre Corporate Website**

**Multi country Final expense report**

**Excel Files from all our subsidiaries**

## Cross-border activities

All ToVs carried out by a FP entity outside the country hosting the organisation's headquarters are published on the company's website in a page dedicated to the transparency of the patients' organisation <https://www.>

## Publication

Pierre Fabre publishes on the Corporate’s website in a dedicated transparency Patient Organisation page:

 <https://www.>

This methodological note will be attached to this section.

## Date of Publication

PO ToVs’ realized by Pierre Fabre Group in 2019will be disclosed by the 31st December 2020 on the Member Company website according to the EFPIA Code.

## Disclosure language

The disclosure is available in English.

## Disclosure currency

ToVs are disclosed in the local currency of the country where the Patient Organisation has been formally registered and include all taxes.

## Archivage

Pierre Fabre Group is maintaining relevant records of disclosure for a minimum of 3 years.

# MANAGEMENT OF RECIPENT’S REQUEST

Request or disputes are managed both at Pierre Fabre Pharmaceutical local and global level.

A central e-mail address for requests is dedicated to PO communication: **TRANSPARENCY.COMPLIANCE@pierre-fabre.com**

Pierre Fabre Corporate commits to answer and resolve the request within 30 days of receiving notification of the dispute.