

## **Methodological Note**

### **Servier Russia**

### **Year 2024**

As a pharmaceutical company, SERVIER works in collaboration with various stakeholders including healthcare professionals, healthcare organizations and patient organizations to improve health and quality of life. Healthcare professionals and organizations provide the pharmaceutical industry with valuable, independent and expert knowledge derived from their clinical and scientific experience. They should be fairly remunerated for the legitimate expertise and services they provide to the industry.

Fully aligned with the objectives of the EFPIA and AIPM<sup>1</sup> Codes of practice, SERVIER see transparency reporting as an opportunity to demonstrate its commitment to implement, comply with and enforce the highest ethical standards.

The present document is intended to provide all methodological information relevant for interpretation of the information disclosed by SERVIER in Russia.

## **1. Definitions**

### **1.1. RECIPIENTS OF TRANSFERS OF VALUE**

#### **1.1.1. Healthcare Professionals**

The following definition of Healthcare Professionals is provided by the AIPM Code of practice:

*Doctors and other medical professionals, heads of medical organizations, pharmaceutical professionals (including pharmacists), heads of pharmacy organizations, and other specialists the professional activity of which is concerned with pharmaceutical products and who in the process of their professional activity have the right to prescribe, recommend, purchase, supply, or administer pharmaceutical products*

This definition allows identifying the following professionals our Company is interacting with:

- Medical doctors
- Heads of medical organizations
- Pharmacists
- Heads of pharmacy organizations
- Other medical professionals

#### **1.1.2. Healthcare Organizations**

The following definition of Healthcare Organizations is provided by the AIPM Code of practice:

*Any legal entity irrespective of its legal or organizational form, individual entrepreneurs (i) that are a healthcare organization or association, or a medical, pharmaceutical or scientific organization or association, for example, a hospital, clinic, foundation, university or other teaching institution (except for patient organizations) location or primary place of operation of which is within the Russian Federation or (ii) which provides services through one or more healthcare professionals*

This definition allows identifying the following Organizations our Company is interacting with:

- Hospitals,
- Healthcare institutions or clinics,
- Group medical practices,
- Clinical research Organizations or equivalent service providers,

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<sup>1</sup>AIPM – Association of International Pharmaceutical Manufacturers

- Service provider in preclinical research,
- Universities (Medical departments),
- Foundations and charities involved in the medical domain,
- Medical or learned societies,
- Medical education companies,
- Associations of healthcare professionals.

#### 1.1.3. Patient Organizations

The following definition of Patient Organizations is provided by the AIPM Code of practice:

*A non-commercial organization representing the interests and needs of patients, their families, and/or persons taking care of patients and/or disabled persons*

### 1.2. KIND OF TRANSFERS OF VALUE BEING DISCLOSED

#### 1.2.1. Transfers of Value to Healthcare Professionals

Transfers of value disclosed by our Company consist in:

- Registration fees,
  - Travel and accommodation expenses,
  - Fees for services,
  - Expenses agreed in the services or consultancy contracts.
- ⇒ When provided, paid or reimbursed to Healthcare Professionals or for their benefit, either directly or indirectly.

#### 1.2.2. Transfers of Value to Healthcare Organizations

Transfers of value disclosed by our Company consist in:

- Donations and grants,
  - Registration fees,
  - Sponsorship agreements,
  - Travel and accommodation expenses,
  - Fees for services,
  - Expenses agreed in the services or consultancy contracts.
- ⇒ When provided, paid, or reimbursed to Healthcare Organizations or for their benefit, either directly or indirectly.

#### 1.2.3. Transfers of Value related to Research and Development Activities

According to the AIPM Code of practice, Research and Development activities correspond to:

- Non-Clinical Studies (laboratory),
- Clinical Trials
- Non-interventional studies that are prospective in nature and that involve the collection of patient data from or on behalf of individual, or groups of, HCPs specifically for the study

All non-interventional studies that do not fall within the scope of “prospective studies”, publication is made on a nominative basis. As such, retrospective studies will be disclosed under the “consultancy / fee for services” category of the disclosure template. In case it is not possible to distinguish between prospective and retrospective non-interventional studies, the disclosure of all NIS will be on an individual basis.

#### 1.2.4. Transfers of Value related to Patient Organizations

Transfers of Value disclosed by our Company consist in:

- Financial support
- Significant non-financial support
- Contracted services
- ⇒ When provided, paid or reimbursed to Patient Organizations or for their benefit, either directly or indirectly. Transfers of Value provided to Patient Organizations are disclosed on nominative basis, even when related to Research and Development activities.

## **2 Disclosure's scope**

### **2.1. PRODUCTS CONCERNED**

The Transfers of Value related solely to activities in connection with Over-The-Counter products are out of the scope of the disclosure.

### **2.2. COMPANY CONCERNED**

The information disclosed by our Company in the present country is provided on behalf of the Servier Group.

Servier is a Group of companies with affiliates in other countries that can initiate interactions with Healthcare Professionals, Healthcare Organizations, Professional Congress Organizers or Patient Organizations

A Group process is implemented to ensure that the local disclosure includes all transfers of value provided by companies of the Servier Group, either established locally or in foreign countries, during the previous calendar year (from 1<sup>st</sup> January to 31<sup>st</sup> December).

### **2.3. EXCLUDED TRANSFERS OF VALUE**

The Transfers of Value corresponding to the following categories or provided in relation with the following activities, are not included in the disclosed information:

- Activities solely related to Over-the-counter pharmaceutical products,
- Items of medical utility,
- Meals and drinks,
- Travel expenses in line with the threshold applicable to Meals and drinks,
- Medical samples,
- Commercial activities that are part of ordinary course purchases and sales of medicinal products,
- Or any Transfer of Value which is out of the reporting scope, as defined by the AIPM Code of practice.

### **2.4. TOVS DATE**

As a standard rule, the date considered to prepare the disclosure corresponds to the date of the financial payment made to or for the benefit of the recipient.

### **2.5. DIRECT AND INDIRECT TRANSFERS OF VALUE**

The disclosure includes both direct and indirect Transfers of Value provided to recipients or for their benefit. In this context:

- Direct Transfers of Value are provided to the recipient by our Company directly,
- Indirect Transfers of Value are provided to the recipient through a third party. In this situation, our partners are required by contract to share with our Company all information relative to Transfers of Value in order to allow an appropriate preparation of the disclosure.

Note: Sponsorship fee paid to the technical organizer in this case shall be disclosed as transfer of value to the HCO, which appointed the technical organizer.

## **2.6. NON-MONETARY TRANSFERS OF VALUE**

- Donations to HCOs or POs can be both monetary and donations in kind.
- For significant non-financial support that cannot be assigned a meaningful monetary value, the description describes the non-monetary benefit that the Patient Organization receives.

## **2.7. DISCLOSURE FORMAT OF TRANSFER OF VALUE THROUGH TECHNICAL ORGANIZERS**

Contributions provided to Events through technical organizers (at a request of an HCO that would therefore be the direct Recipient of the Transfer of Value) must be considered as indirect Transfer of Value and be reported on an individually named basis.

Transfer of Value through technical organizers are reported in the name of benefitting HCO.

## **2.8. TRANSFERS OF VALUE IN CASE OF PARTIAL ATTENDANCE OR CANCELLATION AND REFUND**

In case of partial attendance or cancellation of the participation, Transfers of Values provided for the benefit of a recipient will remain within the disclosed information. Exception applies when Transfers of Values can be refunded.

## **2.9. CROSS BORDER ACTIVITIES**

The Servier Group makes their best efforts to capture and report all Transfers of Value to HCPs, HCOs, and POs provided by the companies of the Group, either established locally or in foreign countries. Transfers of Value initiated by foreign companies of the Group are captured for disclosure in the country where the recipient has its physical address or principal place of practice, if applicable.

## **2.10. RESEARCH & DEVELOPMENT**

All kind of Transfers of Value – as identified in 1.2.1. and 1.2.2. – provided to Healthcare Professionals, or Healthcare Organizations in relation with Research and Development activities are disclosed in aggregate. For Transfers of Value provided to Patient Organizations in relation with Research and Development activities, please see section 1.2.4.

# **3. Specific Considerations**

## **3.1. COUNTRY UNIQUE IDENTIFIER CODE (UCI)**

The allocation of a Unique Country Identifier Code is intended to facilitate the identification of recipients at country level and to prevent confusion when several recipients have the same name.

This code is optional according to the EFPIA and AIPM Codes of practice.

In SERVIER Russia, the UCI corresponds to:

- For Health care professionals - Insurance individual account number (SNILS) which is used for our internal records but is not published for personal data security reasons.
- For Health care organizations – Taxpayer personal identification number (INN) which is published together with other information about a Healthcare Organization.

## **3.2. SELF-INCORPORATED HEALTHCARE PROFESSIONALS**

Self-incorporated Healthcare Professionals are assimilated to Healthcare Organizations for the purpose of the Disclosure.

## **3.3. MULTI-YEAR AGREEMENTS**

Multi-year agreements refer to contracts with Healthcare Professionals or Healthcare Organizations that generate Transfers of Value beyond a period of twelve months.

This kind of agreement has no impact on the disclosure: only the date of each Transfer of Value, as isolated operation, is taken into consideration to prepare the reporting.

## **4. Data protection legal basis**

### **4.1. CONSENT COLLECTION**

Consent to individual publication is collected prior to the publication through a dedicated consent form.

The consent expressed by the recipient is deemed valid until it is revoked by the recipient and covers all the interactions that occur within this period.

In case no consent is given, or if our Company was unable to obtain a consent form duly filled by the recipient, the publication is made under the aggregate category.

### **4.2. MANAGEMENT OF CONSENT WITHDRAWAL**

A recipient may decide to modify or withdraw his or her consent to individual publication.

In that case, the publication will be adapted in short delay in accordance with the decision taken by the recipient. Disclosed information will be updated to move the amounts from the individual information category to the aggregated information category as defined by the reporting publication template.

### **4.3. MANAGEMENT OF RECIPIENT'S REQUEST**

Recipients may initiate requests related to the information being published by our Company.

All demands will be processed according to our internal procedure.

### **4.4. PARTIAL CONSENTS**

Partial consents are deemed equivalent to "negative consents" to the individual publication. In case of partial consent, the publication of all the transfers of value that benefit to the HCPs is made in aggregate.

The information disclosed in the individual category of the publication includes as a result all the interactions in the scope of the disclosure requirements that occurred with a given recipient during the previous reporting period.

## **5. Form of Disclosure**

### **5.1. DATE OF PUBLICATION**

The Data should be published no later than June 30, 2025.

This date has been defined in accordance with the AIPM Code of Practice recommendation.

### **5.2. REPORTING YEAR**

The publication relates to the previous calendar year (from 1<sup>st</sup> January to 31<sup>st</sup> December).

This information will remain available on Internet for a period of 3 years after the date of the publication, considering the transfer of the individual form of disclosure into aggregate, in case of a subsequent withdrawal of consent by the recipient.

### **5.3. DISCLOSURE PLATFORM**

The publication is provided through:

The publication is provided through Servier's publication page «Disclosure of Information» on [www.servier.ru](http://www.servier.ru)

### **5.4. DISCLOSURE LANGUAGE**

The publication is provided in Russian and English.

## **6. Disclosure Financial Data**

### **6.1. PUBLICATION CURRENCY**

The currency used for the current publication is: Russian Rubles (RUB).

### **6.2. VAT**

Financial amounts indicated in the publication are expressed VAT excluded when it is technically possible.

### **6.3. CALCULATION RULE**

For Transfers of Value involving the use of foreign currencies, amounts are converted from the initial currency to the publication currency according to the Group Monthly Average Exchange Rate applicable at the date of the Transfers of Value.

### **6.4. PERSONAL INCOME TAX & INSURANCE SOCIAL CONTRIBUTIONS (HEALTHCARE PROFESSIONALS)**

Financial amounts indicated in the publication are expressed Personal Income Tax & Insurance Social Contributions excluded when it is technically possible.