Jazz Pharmaceuticals

Methodology for Disclosure

This methodological note outlines the approach taken by Jazz Pharmaceuticals in the United Kingdom in 2024 to meet its obligations and the requirements for disclosing payments and Transfers of Value (ToV) to Healthcare Professionals (HCPs) and Healthcare Organizations (HCOs). These obligations are in accordance with the European Federation of Pharmaceutical Industries and Associations (EFPIA) Disclosure Code and are reflected in the Association of the British Pharmaceutical Industry (ABPI) Code of Practice for the Pharmaceutical Industry.

Definitions:

1. Healthcare Organisation(s)

For purposes of making its disclosures pursuant to the Code, the Company has defined healthcare organisations to include any legal person/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

2. Healthcare Professional(s) (HCPs)

For the purposes of making its disclosures pursuant to the Code, the Company has defined healthcare professional to include any natural person that is a member of the medical, dental, pharmacy or nursing professions or any other person who, during his/her professional activities, may prescribe, purchase, supply, recommend or administer a Medicinal Product and whose primary practice, principal professional address or place of incorporation is in Europe. The definition of HCPs includes: (i) any official or employee of a government, agency or other organization (whether in the public or private sector) that may prescribe, purchase, supply, recommend or administer Medicinal Products and (ii) any employee of a Member Company whose primary occupation is that of a practicing HCP.

3. Other Relevant Decision Makers (ORDMs)

For purposes of making its disclosures pursuant to the Code, the Company has defined ORDMs to include recipients with an NHS role who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply or use of any medicine but who are not health professionals.

4. Patient Organisation or Patient Advocacy Group (PO/PAG)

For purposes of making its disclosures pursuant to the Code, the Company has defined POs / PAGs as a non-for-profit legal person or entity, mainly composed of patients and/or caregivers, that represents and/or supports the needs of patients and/or caregivers and whose business address, place of incorporation or primary place of operation is in the UK.

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5. Transfer of Value (TOV)

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 prescription only medicine 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

Categories of Disclosure

- **Donations and Grants** – donations and grants to HCOs that support health care, including donations and grants (either cash or benefits in kind) to institutions, organisation or associations that are comprised of HCPs and/or that provide healthcare services.
- **Contribution To Costs Related to Events** – contribution to costs related to events, through HCOs or third parties, including sponsorship to HCPs to attend events, such as:
    - Registration fees
    - Sponsorship agreement with HCOs or with third parties appointed by an HCO to manage an event
    - Travel and accommodation
- **Fees received in consideration for consultancy services** and/or Transfers of Value resulting from or related to a contract between the Company and institutions, organisations or associations of HCPs under which such institutions, organisations or associations provide any type of services to the Company (or any other fees not covered in the previous categories). Fees and Transfers of Value (e.g. related expenses reimbursed to or paid on behalf of the institutions, organisations or associations of HCPs as agreed in the consultancy agreement) will be disclosed as two separate amounts.

Data Privacy

In accordance with applicable laws, rules, regulations and requirements relating to the privacy and security of Personal Data (as defined in the EU Data Protection Directive 95/46/EC or any replacement legislation), the Company shall obtain permission from the individual prior to disclosing personal data such as individual Transfers of Value. The Company has made every effort to secure the necessary permissions.

Where permission has not been obtained or where the individual HCP has refused permission, the Company has declared the total spend as an aggregate figure as a separate line entry within the relevant disclosure category.

Research and Development

All payments related to R&D are disclosed as aggregate figures in accordance with the Code.

This disclosure includes Transfers of Value to HCPs or HCOs related to the planning or conduct of:

- Non-clinical studies (as defined in OECD Principles on Good Laboratory Practice); or,
- Clinical trials (as defined in Directive 2001/20/EC); or,
- 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.

Currency

Where payments were made in a currency other than UK sterling, the exchange rate will mean the exact equivalent in sterling according to the date on which the conversion calculation was made. All disclosures will be displayed in the local currency, category totals are displayed in UK sterling and the local currency. The UK sterling totals will be calculated using the exchange rate on the day of payment (http://www.xe.com/). Readers should understand that the total amounts disclosed in sterling could therefore vary slightly from the exact amount paid in the local currency; variations will be greater if there have been significant movements in exchange rate during the reporting period.

Tax

The Company reports Transfers of Value as net (i.e. without value added tax or withholding tax unless the collection of net values is not possible through the Company financial systems).

Reporting Date

There is an inevitable delay between the date on which a payment is approved within the Company and the date on which the payment may be made. The Company will disclose the details of the payment on the date the payment was made and not the date the activity was conducted.

For the 2024 disclosure period, Jazz Pharmacaueticals will disclose transfers of value occurring between January 1, 2024 – December 31, 2024

Multi-Year Projects

Where projects run for several years, the Company will declare the payment amount relevant to the year in which each part of the payment was made. Thus a project which spans 2 calendar years and includes several individual Transfers of Value during that time will have two associated disclosures; one for each calendar year showing the value of the transfer made in that specific calendar year.

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Payments to Charity

On occasion, a HCP who has provided a service to the Company may ask for their fee to be paid to charity. Typically, the Company does not allow this and all payments are made directly to the HCP. In the exceptional circumstances of a payment to charity having been approved, the disclosure will be made against the individual HCP who has provided the service.

Payments to HCOs for Services Provided by Individual HCPs

On occasion, a HCO will insist that any services provided by its HCP employees cannot be contracted with the individual HCP but must be a service contracted through the HCO.

In the event of the Company contracting for the services of a named HCP, the fee received by the HCP will be disclosed under that HCP's entry. Any "administration fee" charged by the HCO will be disclosed as a fee for the service to that organisation.

If the HCP does not receive any additional payment for the service (e.g. because they are speaking at a meeting during normal working hours) then the full amount paid by the Company will be disclosed against the healthcare organisation as a fee for the service.

Private Companies and Associated Charities

Where a HCP runs a private Company or partnership, charity, etc., for the purposes of their private income any payments to that organisation will be regarded for disclosure purposes as a payment to the HCP directly.

Similarly, organisations where the majority of employees or contracted suppliers are comprised of HCPs, the full value of payments made to such organisations associated with the services of a named or identifiable individual will be regarded as if it was a direct payment to the HCP.

Payments to Third Party Organisations for Services Provided by Individual HCPs

The Company regularly contracts with advertising agencies and PR agencies, etc., for services related to its business. On occasion, the work commissioned by the Company might be contracted out to an individual HCP. The Company policy is that all such services must be disclosed to the Company by the contracted service agency. The Company will disclose any payments made to the individual HCP by the service agency as if the payment had been made directly by the Company to that HCP.

Medical Educational Grants to Independent Companies

On occasion, independent companies may be approached by the Company to provide funding in relation to medical educational projects. The rules related to the Company's funding in these circumstances require that the Company has no

influence over the details of the project. The Company would not know whether or which HCPs had been involved in such projects. As such, the Company does not disclose Transfers of Value related to this type of project.

Contributions to Meetings

The Company will disclose all payments made to medical associations, HCOs, etc. in relation to meetings. This includes direct funding such as sponsorship fees or the right to erect an exhibition stand, and indirect support such as providing a logistics agency or subsidising the cost of registration fees. The details are provided in the relevant line entry. The cost of any sponsorship related directly to food is outside the scope of disclosure. All costs associated with meetings run solely by the Company are outside the scope of disclosure except for fees paid to individual HCPs providing services as speakers, etc.

Sponsorship for HCPs to Attend Meetings

The Company supports the attendance of HCPs at meetings. The Company will disclose the associated Transfers of Value against the individual attendee. Where costs are not individually itemised (e.g. the cost of a bus transferring a group of HCPs from an airport to a conference venue), the total cost will be split equally between all those receiving the benefit. Costs declared include transport, registration fees and accommodation. Costs related to subsistence are not declared but the meal costs are regulated by strict industry guidelines.

Grants to HCOs for Support to Attend Medical Meetings

On occasion, the Company is asked by a HCO to provide financial support to assist its employees to attend medical meetings. Where the payment is associated with named individuals, the disclosure is made as if the money was transferred directly to the named HCP. Where the Company is not aware of the names of the HCPs receiving the support, the financial support is declared against the named HCO.

Cross Border Payments

The Company is a global business that operates in many countries and therefore from time to time may contract HCPs and HCOs from different countries. For these arrangements disclosures will be made in the recipient's country by the Jazz affiliate located or operating in that country according to local laws and regulations. Payments made to local organisations by Jazz entities located in other countries are disclosed locally regardless of the source of funding.

Patient Organisations

All Transfers of Value to patient organisations are disclosed directly on the Company website Jazz Pharmaceuticals (https://www.jazzpharma.com). If the money is associated with an individual HCP working with the patient organisation, then the

funding will be disclosed twice – the money for the HCP will be disclosed on the local disclosure platform against the individual HCP; and the overall project will be disclosed on the Company's website against the patient organisation entry.

The Company's Partners

As an independently listed Company, the Company discloses all payments made directly from Company bank accounts and listed in the Company records as part of its normal business operations. The Company does not disclose payments made by its shareholders or other stakeholders whether those be individuals or organisations.

Co-Marketing Projects

Where the Company jointly markets a product with another pharmaceutical Company, the Company will only declare those payments made directly from the Company bank accounts and listed in the Company records as part of its normal business operations. Transfers of Value made by its co-marketing partners will be disclosed separately by those organisations.

Disclosure Requirements for UK Patients, Journalists and Members of Public

As part of the 2021 ABPI update, from 1st January 2022, Jazz must disclose details of our payments for certain contracted services paid to UK patients, UK journalists and UK members of the public.

The disclosure covers all Transfers of Value (ToV) to UK patients, journalists and members of the public for services within scope. The disclosure is on an aggregate basis. It includes the total amount of payments made and the total number of individuals in each of the three categories.

Publication and Inquiries

Publication: Jazz Pharmaceuticals will publish transparency disclosure reports in line with the established timelines as defined by the ABPI.

Inquiries: Jazz Pharmaceuticals will review and investigate any inquiries from HCPs and HCOs concerning the submitted transparency reports. Any modifications resulting from this review will be incorporated into an updated report, in accordance with ABPI guidelines.