

Zogenix International Limited

2021 ABPI Transparency Report

Methodology Note for 2021 Transfer of Value (reported 2022)

As of October 2, 2019, Zogenix was added to the non-member list of pharmaceutical companies that agree to comply with the standards of Prescription Medicines Code of Practice Authority (PMCPA) and the Association of the British Industry (ABPI) Code of Practice for the Pharmaceutical Industry.

Zogenix is a rare disease drug discovery company with very few ToV to report. Currently, there is no marketed product in the UK. All ToV reported is represented in Great Britain Pounds (GBP) currency. This report period is Jan 1, 2021, through Dec 31, 2021. Transfer of value is the spend that occurs and is paid during the reporting period. In instances where ToV is paid outside of the reporting year with payment made in 2021, these ToV will be reported in our 2021 report.

Zogenix is committed to ensuring that the highest ethical standards are met at all times when interfacing with HCPs, HCOs, ORDMs, charities, patient organizations, and government bodies. It is Zogenix's commitment that medical professionals and organizations receive expert clinical and disease state knowledge.

Zogenix is fully committed to adhering to the ABPI Code and the organization's desire to be clear and transparent with payments provided to UK Healthcare Professionals (HCP), UK Health Care Organizations (HCO) and Other Relevant Decision Makers (ORDMs). Based on Clause 1.25 of the Code, "Transfer of Value (ToV) is defined as a direct or indirect transfer of value, whether in cash, in-kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development or sale of medicines. A direct transfer of value is one made directly by a company for the benefit of a recipient. An indirect transfer of value is one made on behalf of a company for the benefit of a recipient or through an intermediate and where the company knows or can identify the recipient that will benefit from the transfer of value." Zogenix currently does not conduct any promotional efforts in the UK, because there are no approved pharmaceutical products to sell at this time.

In some countries, due to privacy reasons, consent of HCPs and HCOs must be captured prior to individually disclose the ToV spend. Our contracts with HCPs address these reporting requirements and we have re-confirmed with the HCPs prior to submitting this report. In the instance where an HCP declines and when we were not able to confirm their reporting wishes on their individual ToV, then these amounts are reported as an aggregate.

HCP, HCO, ORDM ToV Definition Payments: We based our spend on the Clause 28 of the *ABPI Code of Practice for the Pharmaceutical Industry, 2021* with the following types of criteria to ensure that all spend is captured.

1) Fee for service and consultancy, such as:

- Consultancy
- Advisory Boards and other consultancy engagements (including associated preparation work)
- Chairing a meeting
- Training
- Educational/Scientific Events

2) Travel related expenses agreed in the fee for service or consultancy contract, such as:

- Flights
- Hotel
- Other transportations costs (mileage, train, taxi, bus, underground, parking)

3) Contribution to cost of events e.g. sponsorship for registration fees, travel and accommodation, such as:

- Congress/Meeting registration
- Flights
- Hotel
- Other transportation costs (mileage, train, taxi, bus, underground, parking)

4) Donations and Grants to HCOs

PO ToV Definition Payments: We based our spend on Clause 29 of the *ABPI Code of Practice for the Pharmaceutical Industry, 2021*, with the following criteria to ensure that all spend is captured.

- 1) Financial support
- 2) Indirect/non-financial support – with clear description of the value the organization receives
- 3) Description of the nature of the support that is sufficiently complete