

Amryt Pharmaceuticals 2022 Methodological Note - ABPI Disclosure Reporting

Tax/VAT considerations:	Yearly amounts for each reportable HCP/HCO is disclosed without VAT
Currency (including conversion rates):	All reported amounts are in British pounds. If the payment is made in another currency, the amount is converted to British Pounds with the rate on the date of the payment.
Transfer of Value Date:	<p>For payments related to contracts and services reimbursed or paid directly to the HCP/HCO (check or cash equivalent), the payment date is utilized for reporting.</p> <p>For in-direct expenses provided in-kind to an HCP (such as travel and lodging) provided on behalf of Amryt, the date that the HCP received the expense is the date utilized for reporting.</p>
Multi-year contracts:	The Company reports all payments made to the reported HCPs/HCOs during the submission year. If a contract contemplated payments to be made in subsequent calendar years, those payments will be reflected in those subsequent calendar years' filings.
Cross Border Payments:	The Company will disclose based on the principal address of the HCP/HCO regardless of the location where the payment was made.
Consent:	The contracts for the reported HCPs/HCOs include consent language between the Company and the HCP/HCOs. By signing the contract, the HCP/HCO is consenting to the disclosure of transfers of value. The Company does not require consent to be obtained in a stand-alone document.
Members of the Public & Patient Organisation Reporting	Amryt will fulfill ABPI's requirements for Transparency to disclose fees for contracted services made to certain members of the public and to Patient Organizations in the UK. Amryt will disclose these fees on the company public website annually before the end of June beginning in 2022. Amryt will provide links to ABPI through the Members of the Public (MoP) and Patient Organisation (PO) gateway, where necessary.
Additional notes:	<p>There were several HCPs in 2022 that invoiced Amryt for travel expenses for an activity organized by Amryt. Since there were no contracts between the HCPs and Amryt, the HCPs were not informed of the Transparency requirements and were not able to provide proper consent for the disclosure of the associated expenses. Due to this, Amryt has reported these expenses in the aggregate for this reporting year.</p> <p>For future activities, Amryt will update the language in Expense Reimbursement Forms to properly communicate to the HCPs Amryt's intentions to disclose expenses for fulfillment ABPI/EFPIA Transparency reporting in relation to activities where HCPs will be reimbursed by Amryt. Contracts with third parties who provide expenses on behalf of Amryt will also include language that will require the vendors to capture consent or to provide written communication that Amryt will disclosure expenses for ABPI/EFPIA Transparency reporting.</p>