



Amarin – European Transparency Disclosure Methodology Statement

The EFPIA Disclosure Code and country specific Legal Requirements such as the Belgian Sunshine Act and the Loi Sapin II in France, requires all member companies to document and disclose certain Transfers of Value (“ToVs”) they make, directly or indirectly, to or for the benefit of, healthcare professional (“HCPs”) or healthcare organisations (“HCOs”). The EFPIA Code is implemented in each country member by the local association.

As a member company of these EFPIA Member Associations, Amarin is committed to ensuring transparency around interactions with European HCPs and HCOs including the nature and scope of our ToVs. Amarin discloses these in accordance with its commitment to the EFPIA Code and the relevant data privacy and transparency disclosure legislation.

This note describes the methodologies and business rules used by Amarin to meet its reporting and disclosure obligations in line with the EFPIA Member Associations Code and European Transparency Disclosure legislations.

Amarin Pharmaceuticals Ireland Limited and its affiliates (“Amarin”) interact with Healthcare Professionals (“HCPs”), Healthcare Organisations (“HCOs”) and Patient Organisations (“PO”) to obtain or provide scientific or educational knowledge or to support medical research in the interest of patients.

Amarin is committed to upholding high ethical standards when interacting with HCPs and HCOs and POs. As part of this commitment and in accordance with applicable industry standards and relevant legislation (“Transparency Disclosure Rules”), Amarin and its affiliates are required to disclose payments made to healthcare professionals and POs.

Amarin has established a Global Transparency Reporting Process in line with the European Federation of Pharmaceutical Industries Associations (EFPIA) Disclosure Code and its local country specific equivalent for the following countries: Belgium, France, Germany, UK and US.

Definitions:

- **Countries in Scope:** All EFPIA reporting countries and associated Laws.
- **EFPIA:** European Federation of Pharmaceutical Industries and Association. European trade organisation representing the research based pharmaceutical industry operating in Europe.
- **“Healthcare Professional (HCP)”:** A member of the medical, dental, pharmacy or nursing professions or any other person who, in the course of 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 the applicable country. If an HCP has set up a private company, as a sole director, they will be considered an HCP for disclosure purposes.
- **“Healthcare Organisation (HCO)”:** A healthcare, medical or scientific association or organisation (e.g., 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 a country with reporting requirements; or an organisation through which one or more HCPs provide services.

- **“Patient Organisation (PO)”**: A patient organisation can be defined as not-for profit organisations which are patient focused, and whereby patients or representatives of patients represent a majority of members in governing bodies and lobby or promote the interests of patients in a particular disease area.
- **“Transfer of Values (TOV)”**: Any direct or indirect benefit incurred on behalf of, payment made to, or provision of an item or service of value to an HCP/O. It is important to note that the country specific laws and regulations and/or industry association codes determine the relevant definition of transfer of value. Any ToV related to HCP’s providing Consulting services must be of Fair Market Value (“FMV”), ensuring a high level of objectivity in the rate determination process and removing any potential bias.
- **“Recipients”**: Any HCP, HCO or PO receiving a ToV from Amarin or on Amarin’s behalf whose, as applicable, primary practice, principal professional address or place of incorporation is in the dedicated countries in Europe. It is important to note that the country specific laws and regulations and/or industry association codes determine the relevant definition of recipients.
- **“Research and Development (R&D)”**: HCP/HCO transfers of value that relate to the planning and conduct of:
 - Non-clinical studies (as defined in OECD Principles on Good Laboratory Practice).
 - Clinical trials (as defined in Directive 2001/20/EC).
 - 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. This also includes investigator sponsored research (ISRs).

Transfers of Value

ToVs made directly to an HCP/HCO/PO or indirectly on behalf of Amarin through a third party will be disclosed within this report.

ToVs are reported based on payment date or transfer of value date (e.g., the date a flight was taken).



The following ToVs made to HCPs and HCOs will be included within our disclosure reports:

Example activities (may vary based on local requirements)

	Example activities	HCP*	HCO
<u>Fees for Service</u> ToVs resulting from or related to a contract where the HCP / HCO provides services.	Advisory Boards Speaker services Consulting services	✓	✓
<u>Related expenses to the fees for service contract</u> ToVs directly related to a fee for service contract.	Travel (incl. flights, taxi, train, parking) Accommodation	✓	
<u>Sponsorship agreements</u> ToVs made to either the HCO directly or to an event organizer or other third party appointed by the HCO to manage an educational or scientific event.	Congress sponsorship Stand / booth sponsorship		✓
<u>Registration fees</u> ToVs related to the registration of an HCP/HCO to attend a congress or educational event.	Registration fees	✓	✓
<u>Travel and accommodation relating to a congress or educational event</u> ToVs related to travel and accommodation in support of an HCPs attendance at a congress or educational event.	Travel (incl. flights, taxi, train, parking) Accommodation	✓	
<u>Donations</u> Funding provided for an unspecified purpose.	Donations		✓
<u>Grants</u> Funding provided to support a specific activity that provides educational benefit or enhances patient care.	Grants		✓
<u>Research and development</u> ToVs related to non-clinical studies, clinical studies and non-interventional studies.	Investigator site fees Advisory boards related to R&D Expert meeting services Data safety monitoring boards Steering Committee meetings Investigator sponsored research	✓	✓

*HCP disclosure will be made based on named individual if consent has been obtained, refer below for further information on our consent methodology.

Research and development will be disclosed in aggregate for all EFPIA Member Association disclosure reports.



Consent

Data protection laws and transparency rules require Amarin to collect consent from HCPs to disclose ToVs against named individuals. For the countries where such a requirement exists, Amarin will contact HCPs to seek their consent to disclose all interactions entered into with Amarin. Where consent has not been granted, Amarin will disclose ToVs in aggregate and will not publish against the named individual.

HCPs have the right to withdraw consent at any time. If Amarin receives such a withdrawal of consent, Amarin will, within a reasonable period, move the relevant ToV data into the aggregate category.

Pre-disclosure validation

Amarin has made reasonable efforts to ensure completeness and accuracy of our disclosable spend and has worked closely with third party vendors and agencies to collect relevant information. In order to maintain transparency in our reporting, Amarin has provided HCPs involved in non-R&D activities, a statement for review and validation prior to Amarin's transparency disclosure reports. If no response has been received to correct the data in the statement, Amarin has assumed this is accurate for disclosure purposes.

Country of disclosure

Amarin discloses ToVs based on the HCPs principal place of practice. If an HCP operates in more than one country, Amarin will select one country to be the primary principal place of practice and disclose in that country.

Currency

Amarin discloses ToVs to HCPs, HCOs and POs in the local currency. Where ToVs are made in another currency, the invoice amount will be converted into the local currency using the exchange rate. Amounts disclosed may therefore vary slightly from the exact amounts paid to HCPs, HCOs and POs.

Tax

Amarin discloses all ToVs excluding VAT and other applicable taxes unless required by law for inclusion, such as in France.

Timing & multi-year contracts

Amarin discloses all ToVs made between 1 January and 31 December following the appropriate local deadline, based on EFPIA Member Associations Code and Legal Requirements. Where an interaction with an HCP, HCO or PO runs for more than one year, Amarin will disclose ToVs made in the year of payment or transfer.

For France, specifically and due to the local legal requirements, data from 1 January to 30 June will be disclosed at the latest on 1 September of the same year and data from 1 June to 31 December will be disclosed at the latest on April 30th of the year after (for 2021/2022 disclosure).



Country	Code / Legal Mandatory Requirements	Reporting Date
Belgium	Legal	31 May
France	Legal	30 April / 1 September
Germany	Code	30 June
UK	Code	Last Working Day of March

Cancellations and non-participation

ToVs will only be disclosed where the benefit has been received. In the event of a cancellation or where an HCP/HCO/PO does not receive the benefit due to non-participation, Amarin will not disclose ToVs against the HCP/HCO/PO.

Disclosure and Document Retention Periods

Amarin will maintain public disclosures for a minimum of three years and will retain records for at least five years after the end of the calendar year to which they relate.