

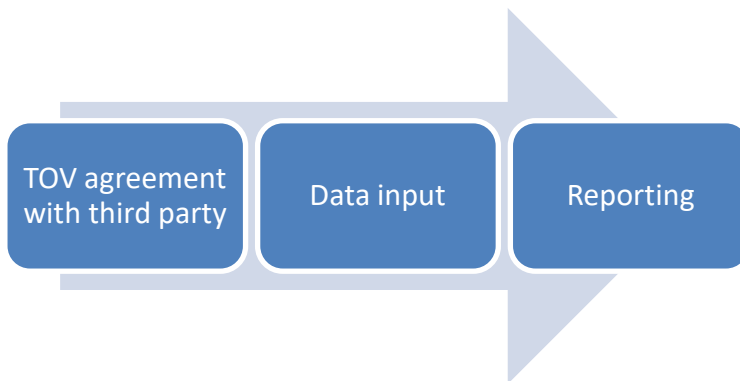


GEDEON RICHTER (UK) LTD
WOMEN'S HEALTH DIVISION

ABPI DISCLOSURE 2016 – GENERAL POINTS

- Information disclosed in the disclosure template includes all ToV transactions with VAT (when applicable) paid to HCPs, ORDMS and HCOs during the period.
- Most transactions are extracted from the company's accounting package. Only a fraction are transactions paid by another member of the Gedeon Richter group.
- Transactions in foreign currency were converted to local UK currency at time of entry in the accounting package.

METHODOLOGY



THIRD PARTY AGREEMENT TO DISCLOSE/NOT DISCLOSE

Gedeon Richter has included an appropriate section to this effect in all its agreements with third parties before there is transfer of value involved.

DATA MANAGEMENT

- Finance has created a flag “disclose/do not disclose” that is maintained in the Supplier record in its accounting system.
- Also in the Supplier record is stored the “HCO” and “HCP” category that enable Finance to pick only suppliers that belong to one or the other category.
- When a transaction is posted in the Accounting package, Finance determines whether the transaction falls into any of the categories defined within the ABPI template (Registration fees, consultancy fees, travel expenses, etc). Appropriate identifiers have been created in the accounting software to that effect.

REPORTING

Cells are populated automatically by formula using XRL (add-on to Excel) which opens a link to our accounting package and takes the information based on relevant criteria. Transactions reported paid by another member of the group are aggregated manually.