

## Zogenix International Limited

### 2019 ABPI Transparency Report

#### Methodology Note for 2019 Transfer of Value (reported 2020)

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.

On behalf of this acceptance, 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 1.10 of the PMCPA 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 or through an intermediate and where the company knows or can identify the recipient that will benefit from the transfer of value." At this time, Zogenix currently does not conduct any promotional efforts, because there are no approved pharmaceutical products to sell at this time.

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.

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 the reporting requirements for ToV.

**HCP and HCOs ToV Definition Payments:** Zogenix is a small, drug discovery company with very few ToV to report. We based our spend on the following types of criteria to ensure that all spend is captured.

1) Fee for service and consultancy, such as:

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

2) 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 and Benefits in Kind to HCOs

Due to COVID-19 pandemic, in accord with the guidance provided by ABPI and PMCPA language, this submission is represented as an aggregate transfer of value report for the requested reporting period of October 2, 2019 through December 31, 2019. All ToV reported is represented in Great Britain Pounds (GBP) currency.