

Almirall Ltd

Disclosure 2022

Methodological Note – March 2023

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1. Introduction

At Amirall we are committed to transparency in our dealings with Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs), to instill trust and transparency, and comply with the ABPI Code of Practice requirements for the disclosure of relevant transfers of value (ToVs).

We believe that transparency is key to building and maintaining confidence and trust in us, and in our medicines. We fully endorse and support the efforts of the ABPI in improving transparency across the pharmaceutical industry.

The ToVs in this report covers all the disclosable payments, to the best of our knowledge, made by Amirall in the UK for the 2022 calendar year.

Disclosure Methodology

During 2022, we continued to use consent as the lawful basis for processing disclosure data, in compliance with the GDPR consent provisions. ToVs to HCPs have been disclosed against the individual HCP only where the data subject consented for individual disclosure basis. Where consent has not been provided, such ToVs have been disclosed under the aggregate category.

ToVs made to UK HCPs, ORDMs or HCOs by Almirall Head Office (Spain) and/or other affiliates have been reported to Almirall Ltd and have been disclosed as required.

ToVs to HCPs conducting business through a limited company have been disclosed against the HCP.

Data was checked for accuracy to the best of our knowledge before publication.

Disclosure of Research and Development Transfers of Value:

Costs that are subsidiary to these activities are included in the aggregate R&D category.

Almirall discloses payments agreed with universities and research centers for pre-clinical research as well as clinical trial agreements in hospitals (either direct payments or through a third-party), fees of independent professionals to provide research and development services, and investigator's meeting expenses.

We do not disclose the payments made to companies providing services for research and development (CROs).

Fees related to retrospective study work have been disclosed under service contracts with HCPs in accordance with their consent type.

2. Categories of Transfers of Value

Disclosures for HCPs includes fees for service (including retrospective studies), travel, accommodation, and registration for third party meetings.

Disclosure for HCOs includes fees for service, sponsorships, and any grants/donation payments.

Almirall Ltd provides grants & donations to certain Patient Organisations in accordance with what is permitted under the Code. Such ToVs made to Patient Organisations will be disclosed by June 2023 and will be available on the Almirall UK website.

Almirall Ltd has not provided any benefits in kind to HCPs, ORDMs and HCOs during 2022.

3. Disclosure Scope

Almirall Ltd promotes Prescription Only Medicines (POM) as well as products that are registered as Over the Counter (OTC) Products and / or Medical Devices. Almirall Ltd does not believe these products fall into the excluded disclosure category and as such we have made disclosures against all ToVs for all products irrespective of their registered category.

Free stock of General Sale List (GSL) products are not included within scope for disclosure.

Note: Whilst Medical Devices do not generally fall into the scope of ABPI Code of Practice, Almirall Ltd has made the decision to disclose ToVs made for such products in line with the ABPI Code of Practice if / where

these products can be both promoted and prescribed. For 2021 we had no medical devices related disclosures to make.

HCPs working for Almirall Ltd as employees (full or part time), contracting consultant staff, are not included in the disclosure data, as all such individual's primary occupation is not that of a practicing health professional.

4. Specific Considerations

ToVs in case of partial attendances or cancellation: There were no cases of partial attendance and therefore these have not been reported in the 2022 disclosure. ToVs that did not ultimately take place or were cancelled are not disclosed as no benefit was received by the HCP, ORDM or HCO.

Cross-border Activities: Where Almirall Global or any other Almirall affiliate provide a ToV to a UK HCP, ORDM or HCO; the respective Almirall entity obtains consent and records the ToV in the Almirall UK CRM system.

Country Unique Identifier: Almirall Ltd aims to maintain an up-to-date contact database which allows HCPs & ORDMs to have more than one practicing address associated with them, for example when an HCP works at different centres / hospitals etc. For the purposes of disclosure, the database utilised only recognises one address - the principal practice address.

ToVs to forums, networks etc.: Those that have no associated principal practice address have been disclosed using the address of the lead HCP or ORDM etc. for the purposes of disclosure.

Multi-year Contracts: Where agreements, sponsorships, and the like fall into more than one year, these are disclosed when any activity is performed, hence payment will be split over several years.

Compassionate Use: Almirall Ltd does not disclose a ToV for any medicines provided on request to HCPs for individual patients which come under 'Compassionate Use Supply'.

Home address: In cases where the HCP has a home address as their place of work, such ToVs have been disclosed in aggregate in an effort to protect the individual's privacy.

Homecare providers: Payments made to homecare providers for the provision of homecare services have not been included for disclosure purposes as such payments are treated as packaged deal offerings and cannot be meaningfully attributed to a specific HCO.

5. Consent Management

Consent collection: In the spirit of transparency and in compliance with GDPR requirements Almirall Ltd has provided each HCP the opportunity to confirm their consent type (individual or aggregate). As of July 2021, Almirall Ltd operates a 'universal consent model' which means HCPs provide their consent once and this is applied to all engagement following the provision of that consent. HCPs have the option to revise their consent type at any time by emailing Almirall directly. As of Jan 2023, Almirall Ltd has adopted legitimate Interest as the lawful basis for processing data for disclosure purposes.

Management of recipient data/consent withdrawal: The consent management system enables amendment from individual to aggregate or vice versa and consents are changed manually in the database. This is done via an email inbox specified in the consent form/agreement (tovconsentuk@almirall.com). If an HCP / ORDM requests clarification or changes to the disclosed data or consent status Almirall Ltd will act on the request as appropriate, replying to the HCP / ORDM with the clarification requested or that the change has been implemented. The email from the HCP will serve as evidence of withdrawal / change of

consent. Disputes on the value of the ToV disclosed will be resolved as quickly as possible and the disclosed data amended where possible and required.

6. Financial Information

Currency: All disclosed ToV data is reported in GBP. Where a ToV has been provided by Almirall Ltd or a third-party from outside the UK such ToVs are provided in the local currency and converted to GBP using the spot rate during the month of engagement.

VAT: VAT is included in the disclosure data, where it applies due to country or event requirements.

Invoice payment date: All ToVs taking place in 2022 are disclosed to the best of our knowledge (any data relating to 2022 which was available up to 23rd March 2023 was included in this report). For pending invoices related to events that took place during 2022, all invoices paid up to 23rd March 2023 have been included in the 2022 disclosure.

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