

Stallergenes AG has signed the Swiss Pharma Cooperation Code (PCC), which requires it to disclose on its website the payments in kind made to medical professionals and healthcare and patient organisations.

The disclosures of payments in kind that are made by Stallergenes AG for its cooperation with medical professionals and healthcare and patient organisations, if the cooperation relates to prescription drugs for human medicine.

Payments in kind are defined as cash payments, non-cash benefits, donations, subsidies or some other form that directly or indirectly relates to consulting or other services, R&D, marketing, sales or other purposes. Direct payments in kind are those that Stallergenes AG makes directly to a certain recipient. Indirect payments in kind are those that third parties (such as suppliers, agents, partners, branches or foundations) provide to a recipient in the name or on behalf of Stallergenes AG.

This disclosure does not include discounts, samples, and meals if these are permitted under the PCC.

The disclosure includes, but is not limited to, the name and address of the professional, the healthcare organisation or the patient organisation, type and reason for the payment in kind (sponsorships, fees for presentations or consultation services, contribution to professionals' expenses for participating in an event, such as payment of the registration fees, contributions to the travel and hotel expenses etc.) and the relevant amount.

The disclosure will be made annually on Stallergenes AG's website in a publicly accessible area

The records will be publicly accessible for at least three years.

Stallergenes AG is required to disclose the corresponding information on an individual basis where possible. It is entitled only in exceptional cases to publish the information in consolidated form.

## **Disclosure of imputed income - Information and methodology**

### **1. definitions**

a) Health Care Professionals (HCPs) are natural persons who, as full-time working members of the medical, pharmaceutical, or other health care professions or otherwise within the scope of their professional activities, are authorized to prescribe, purchase, supply or use prescription-only medicinal products for human use.

b) Health care organizations (HCOs) are legal entities, regardless of their legal form, through which one or more healthcare professionals provide medical or research services. These include, among others, clinics, universities, consulting companies, further and continuing education institutes and professional associations.

c) Assets Benefits are direct or indirect payments or the direct or indirect granting of pecuniary advantages to healthcare professionals or healthcare organizations. This means that the amounts listed are not the amounts paid to the recipients listed. For example, travel, accommodation, or congress expenses are regularly paid directly to the agencies, transport service providers or hotels. In cases where the designated HCOs have commissioned agencies or service providers to organise

medical-scientific training events, the sponsorship amounts have been paid to the agencies and not to the HCOs.

## **2. which pecuniary benefits are disclosed**

Monetary benefits are payments in cash, kind, gifts, grants or in any other form which are directly or indirectly for consultancy or services, research and development, advertising, sales or other purposes. Direct benefits of monetary value are those that Stallergenes AG provides directly to a specific recipient. Indirect pecuniary benefits are those provided by third parties (e.g. suppliers, agents, partners, subsidiaries or foundations) to a recipient in the name of or on behalf of Stallergenes Ltd.

Non-cash benefits disclosed by Stallergenes Ltd are those provided in the course of Stallergenes Ltd's collaboration with healthcare professionals and healthcare and patient organisations if the collaboration is related to prescription medicines for human use. Excluded from disclosure are discounts, samples, and meals, insofar as these are permissible according to the Pcc.

Specialists who receive cost contributions for participation in events bear 1/3 of the total costs, and assistant doctors bear 1/5 of the total costs.

In the case of publication, a distinction was made between individual publication with disclosure of the HCP's name and practice address and aggregated (summarised) publication of benefits which may not be published individually due to legal provisions. Publication with individual naming of the recipient's personal data is only permitted with the recipient's express prior consent (see also 2. Legal basis).

## **3. legal basis - consent to disclosure**

The disclosure of pecuniary benefits on an individual basis is subject to the consent of the data subjects. All HCPs were asked in advance for permission to disclose pecuniary benefits by means of a separate written transparency consent form in order to obtain this consent. This consent can be revoked at any time for the regulation of future monetary benefits. However, non-cash benefits already received remain subject to disclosure unless they would be repaid in full to Stallergenes Ltd before the end of the calendar year in which the corresponding non-cash benefits were granted.

## **4. period of recording of the pecuniary benefits and publication period**

The disclosure shall be made annually on the website of Stallergenes AG in the publicly accessible area, for the first time in 2016 for benefits granted in 2015. The entries are publicly accessible for at least three years.

## **5. disclosure of data from 2018 with payment in 2019**

Monetary benefits that were granted in 2018 but the payment did not take place until 2019 are disclosed in the monetary benefits for 2019.

## **6. cross-border monetary benefits**

Monetary benefits are disclosed in the country where the healthcare professional or healthcare provider or patient organisation is based.

## **7. value added tax**

Monetary benefits of Stallergenes AG are disclosed including value added tax.

The methodology used: Pharma Codex:

- Transfer of Value to PO in CHF
- Transfer of Value to HCP in CHF
- Transfer of Value to HCO in CHF
- R&D in Switzerland in CHF
- Total in CHF
- Target Consent Rate per category in % (objective STAG CH 100%, Pharma Codex 80%).