

ORGANON Methodology Statement

Introduction

ORGANON Poland believe that interactions between pharmaceutical companies and healthcare professionals have a profound and positive influence on the quality of patient treatment and the value of future research. Recently, there is a growing expectation that such interactions are transparent. As such, the European Federation of Pharmaceutical Industries and Associations adopted in 2014 the Code on Disclosure of Transfers of Value from Pharmaceutical Companies to Healthcare Professionals and Healthcare Organizations (Code), requiring its members, including ORGANON, to disclose pre-defined types of transfers of value to healthcare organizations and healthcare professionals on an annual basis. This Methodology Statement defines the relevant types of transfers to be disclosed, which transfers are excluded, and other relevant information to assist the reader understand how ORGANON collected, organized and reported the disclosed data.

Definitions

Clinical Research Organization (CRO) – an organization that provides support to the pharmaceutical, biotechnology, and medical device industries in the form of research services outsourced on a contract basis. A CRO is not a HCO.

Event – all promotional, scientific or professional meetings, congresses, conferences, symposia, and other similar events (including advisory board meetings, visits to research or manufacturing facilities, and planning, training or investigator meetings for clinical trials and non-interventional studies), organized or sponsored by or on behalf of ORGANON.

Healthcare Organization (HCO) – any legal person (i) that is a healthcare, medical or scientific organization such as a hospital, clinic, foundation, university or other teaching institution or learned society (but not a patient organization) or ii) through which one or more HCP's provide services.

Healthcare Professional (HCP) - any natural person that is a member of the medical, dental, pharmacy or nursing professions or any other person who as part of their professional activities may prescribe, purchase supply or administer a medicinal product and whose primary practice or principal professional address is in Poland. This includes midwives. For clarity, a HCP includes: i) any official or employee of a governmental agency or other organization (whether in the public or private sector) that may prescribe, purchase, supply or administer medicinal products and ii) any employee of ORGANON whose primary occupation is that of a practicing HCP, but excludes: x) all other employees of ORGANON and y) a wholesaler or distributor of medicinal products.

Recipients – any HCO or HCP whose primary practice, main professional address or place of incorporation is Poland.

Transfers of Value (ToV's) – direct and indirect transfers of value, whether in cash, in kind or otherwise, made in connection with the development and sale of medicinal products for human use.

A Direct ToV is one made by directly ORGANON for the benefit of a Recipient.

An Indirect ToV is one made by a third party (such as a contractor, travel agent, partner or affiliate) on behalf of ORGANON for the benefit of a Recipient where the Recipient knows it is from, or can identify, ORGANON.

Research and Development ToV's are ToV's to an HCO or HCP related to the planning or conduct of: i) non-clinical studies (as defined in *OECD Principles on Good Laboratory Practice*); ii) clinical trials (as defined in Regulation (EU) 536/2014); and iii) non-interventional studies that are prospective in nature and that involve the collection of patient data.

Disclosure's scope

Excluded ToVs. The following ToV's are expressly excluded under the Code from disclosure: i) those solely related to over-the-counter medicines; ii) are part of ordinary course purchases and sales of medicines (for example, between ORGANON and a pharmacy); iii) medical samples, investigational compounds and biological samples for study; iv) informational or educational materials and items of medical utility; v) meals and drinks that remain below the limits set by INFARMA, the pharmaceutical industry association of Poland.

ToV Recognition Date. ToV's are disclosed on the basis of the date ORGANON made the ToV, not when the resulting income or benefit was received by the HCO/HCP. Direct ToV's are disclosed on the basis of the date ORGANON made the ToV, not when resulting income or benefit was received by the HCO/HCP; Indirect ToV's concerning travel and accommodation are disclosed on the start date of the Event.

ToV Value. TOV disclosures reflect the actual value or cost provided by ORGANON and not the resulting income or benefit to the HCO/HCP.

HCO ToV's. The following types of ToV's to HCO's are disclosed by ORGANON:

- i) donations and grants that support healthcare (including charitable product donations and logistic assistance to people in emergency need);
- ii) contributions to costs related to Events, including sponsorship of HCP's directly or indirectly through HCO's to attend Events, such as:
 - a. registration fees,
 - b. sponsorship agreements with HCO's or with third parties appointed by an HCO to manage an Event (examples include hiring a booth or stand space, acquiring advertising space (in paper, electronic or other format), arranging a satellite symposia at a congress, sponsoring of speakers or faculty, the costs of drinks or meals provided by the HCO if part of an inclusive package, and courses provided by a HCO where ORGANON does not select the individual HCPs that participate), and
 - c. travel and accommodations; and
- iii) fees for service and consultancy (examples include retrospective non-interventional clinical studies and epidemiological studies). To the extent incidental expenses incurred under a service or consultancy agreement are reimbursed (e.g., travel and accommodation), such ToV is disclosed in the relevant category and not as a fee for service or consultancy.

HCP ToV's. The following types of ToV's to HCP's are disclosed by ORGANON:

- i) contributions to costs related to Events such as:
 - a. registration fees, and
 - b. travel and accommodations (such as costs of flights, trains, car hire, tolls, parking fees, taxis and hotel accommodation); and
- ii) fees for service and consultancy (examples include speakers' fees, speaker training, medical writing, data analysis, development of educational materials, general consulting and advising via advisory boards/expert input fora, fees for participating in market research when the identity of the HCP is known to ORGANON, and investigator-initiated studies that do not meet the definition of Research & Development ToV's). To the extent incidental expenses incurred under a service or consultancy agreement are reimbursed (e.g., travel and accommodation), such ToV is disclosed in the relevant category and not as a fee for service or consultancy.

ToVs in case of cancelled events and participations. In case third-party events are cancelled independent of the will of ORGANON and in case invited HCPs do not show or cancel late their participation to events they have accepted to attend, the related ToV is disclosed equal to the amount of the costs ORGANON has not recovered.

ToVs in case of partial attendance. ORGANON only reports the ToV amount actually received by a Recipient in case of a partial attendance, not the full amount paid by ORGANON.

Cross-border activities. Regardless of which ORGANON entity contracts with and pays a Recipient, all HCO's or HCP's whose primary practice, main professional address or place of incorporation is in Poland are reported by ORGANON.

Disclosing entities. This annual disclosure report covers all ToV's made to HCO's and HCP in Poland, whether by ORGANON Poland or by its affiliates based in other countries.

Specific considerations

Country unique identifier. In order to ensure disclosure of ToV's are allocated correctly, ORGANON has assigned a unique identifier to each HCP and HCO.

Self-incorporated HCP. Disclosure is made on the HCP's name. So, a Fee for Service paid to a legal entity owned by an individual HCP is disclosed under the HCP's individual name.

Multi-year agreements. Disclosure is made on the basis of the year the actual ToV's was provided, and not on the basis of a pro rata amount of the intended total ToV under the agreement.

Consent management

Consent collection. Unless disclosure is mandated by local legislation, data protection legislation in force in Poland, as reflected by the more stringent requirements contained in the General Data Protection Regulation (EU) 679/2016, requires ORGANON to obtain the consent of each HCP to disclose their personal information. ORGANON has made its best effort to obtain such consent so as to be as

transparent as possible about the nature and scale of its interactions with HCP's. The means by which ORGANON has obtained consent in Poland is by a stand-alone agreement covering all interactions with the HCP for an entire year.

Management of Recipient consent withdrawal. A Recipient has the right to withdraw their consent at any time. If this occurs prior to ORGANON's publication of the ToV, then the Recipient's ToV's shall be reported on an aggregate basis only with no disclosure of the Recipient's name. If consent is withdrawn by a Recipient after the publication of the relevant year's ToV's, then the Recipient's name and ToV's shall be removed and the corresponding amount of ToV's will be added to the aggregate reporting for the remainder of the 3 year period for which the publication remains available. The reports will be refreshed and republished within 30 days of the consent withdrawal.

Partial consent. In the event an HCP consents to disclosure of only a portion of the ToV's they have received (which is not in the interest of ORGANON or EFPIA), ORGANON will disclose the entire amount of the HCP's ToV's in the aggregate without naming the HCP. Partial disclosure under the individual disclosure category would be misleading with respect to the nature and scale of the interaction between ORGANON and the HCP.

Disclosure Form

Date of publication. ORGANON publishes the ToV for the preceding calendar year no later than 6 months after the end of the relevant reporting period (for example, ToV's for 2021 are reported no later than June 30, 2022). The information disclosed shall remain available for three (3) years thereafter, subject to individual disclosures being shifted to aggregate disclosure in the event of after-the-fact revocation of consent by the Recipient.

Disclosure platform. ORGANON provides its annual disclosure via own web site.

Disclosure language. ORGANON provides its annual disclosure in Polish.

Disclosure financial data

Currency and VAT. All disclosed ToV's are reported in local currency and inclusive of VAT. ToV's paid in other currencies are converted to local currency at the exchange rate applicable on the date the cost is incurred.

How is VAT Managed?

Disclosed ToV's to HCO's and HCP's reflect the amounts agreed in the contracts and on invoices submitted to ORGANON by HCO's or HCP's. The data collection and reporting is by guidance to all data providers based on "gross amounts".