

HEMOFARM AD

DISCLOSURE AND TRANSPARENCY METHODOLOGY IN BUSINESS OPERATIONS WITH HEALTHCARE PROFESSIONALS, HEALTHCARE ORGANIZATIONS AND PATIENTS' ASSOCIATIONS

This document presents the methodology for disclosure of information of the company HEMOFARM AD Vršac and its business units and affiliations, including HEMOFARM DOO Banja Luka, HEMOFARM DOO Sarajevo, HEMOMONT DOO Podgorica and VELEXFARM DOO Beograd (jointly referred hereinafter as: „HEMOFARM“) on performed value transfers to healthcare professionals, organizations and associations in line with the law of Republic of Serbia as well as applicable provisions of the Code of Conduct of 'Medicines for Europe' Association (Chapter 7 – Transparency Rules and Requirements) as well as internal regulations of STADA Group and company HEMOFARM AD Vršac.

1. Transparency obligations

Transparency is the prerequisite for building trust of the public and patients.

HEMOFARM AD and its related companies /affiliations support rules and regulations promoting transparency in interactions with healthcare professionals, organizations and patients' associations.

Data on professional cooperation between HEMOFARM and healthcare professionals, organizations and patients' associations that are the subject of publication in line with the regulations and provisions of the "Medicines for Europe" Code of Conduct are available on our internet page www.hemofarm.com.

Disclosure of financial amounts in the transparency report is done in the local payment currency.

2. Disclosure process

Value transfer data will contain information on all relevant value transfers to healthcare professionals, healthcare organizations and patients' associations.

The terms health professionals, patients' organizations and associations are understood, for the purpose of this methodology, as defined by local legislation and internal acts.

a) Value transfers to healthcare professionals

Value transfer data will contain information on payments in money and transfers of other values (for example, for the purpose of enabling the participation of health professionals in professional

gatherings and meetings in accordance with regulations, including participation fees, transportation and accommodation costs).

The subject of the publication of the transfer of value to health professionals are:

- costs of educational support for participation in professional gatherings, professional or scientific meetings, congresses, conferences and similar events aimed at educating healthcare professionals and which are organized on behalf of HEMOFARM or which are sponsored by HEMOFARM, including costs of visits to HEMOFARM's sites, which includes the participation fee, travel and accommodation costs related to participation in the specified gatherings and/or visits to sites;
- compensations for performed services paid on the basis of consultancy agreements, copyright contracts, temporary service contracts, contracts on membership in advisory boards and other services agreements.

In the case of value transfers based on the payment of fees for services paid on the basis of consultancy agreements, copyright contracts, temporary service contracts on membership in advisory boards and other service contracts, value transfers may be published individually or collectively. Data on value transfer for the benefit of health professionals who, when signing the cooperation agreement, gave their consent for the publication of their data are published individually. For such a health professional, the following information is published (in accordance with the applicable personal data protection laws): name and surname, address of the institution or practice and (if applicable) license number, type of service, value / amount of payment. Such consent is voluntary and may be withdrawn at any time by written withdrawal of consent. After withdrawing consent, HEMOFARM will remove the data from its website as soon as objectively possible. In all cases of withdrawal of consent for publication, the data on the transfer of value will be published collectively, without disclosing the identity of the recipient.

Data on the transfer of value in favour of healthcare professionals who did not give their consent for the public disclosure of their data when signing the cooperation agreement are published collectively. The collective announcement means the announcement through which the insight into the total number of agreements on contracted services with healthcare professionals, recipients of value transfer on the basis of concluded contracts will be enabled, expressed in value in the total gross amount of paid fees for all forms of cooperation.

The following is specified in view of costs of educational support to participation in professional gatherings, expert or scientific meetings, congresses, conferences, site visits and similar events aimed at educating healthcare professionals and which are organized on behalf of HEMOFARM or sponsored by HEMOFARM: event, period, venue, as well as the total amount of funds spent for this event and number of healthcare professionals, whose participation in such a gathering has been supported.

Organizational unit for Marketing and sales compiles the specified data on an annual basis and delivers it to Head of Compliance no later than the end of January of the current year for the entire previous calendar year, who will organise publishing of these data on official Hemofarm website www.hemofarm.com.

In accordance with rules in effect, Hemofarm informed Ministry of Health about the corporate website (www.hemofarm.com) where the data regarding professional conferences is published.

Hemofarm will promptly inform Ministry of Health of every changes to the website where information about sponsored professional conferences is published.

b) Transfers of value to healthcare organizations

The subject of the publication of the transfer of value to health organizations are:

- data on donations
- data on events sponsorships (excluding data on sponsored expert trainings/congresses, which are published in line with the previous item 2a.)

Data on specified transfers to healthcare organizations are published individually. Each type of donation or sponsorship is published by naming the healthcare organization and type of value transfer (in kind or in money), including the total amount of spent funds given to an institution over the course of observed calendar year.

c) Value transfers to patients' associations

The subject of publication of value to patients' associations are:

- data on donations given to patients' associations
- data on sponsorship of events or activities of the patients' associations

Data on specified transfers to patients' associations are published individually. Each type of donation or sponsorship is published by naming the association and type of value transfer (in kind or in money), including the total amount of spent funds given to one and same association over a period of observed calendar year.

3. Frequency of data publishing

HEMOFARM will publish data on value transfer to healthcare professionals / healthcare organizations / patient associations once a year. All listed data on value transfers collected during one calendar year will be published no later than January 31 of the following calendar year.

The first data in line with this methodology will be published until 31/01/2022 and they will refer to value transfers performed over the course of 2021. Data will be publicly available for two years, counting from the date of first publication.