

EFPIA Disclosure code

Methodology and comments



THE
BLADDER CANCER
COMPANY

METHODOLOGICAL NOTE



- **WHEN:** The Code has been valid from 01.01.2015. Disclosures shall be made on an annual basis, and each reporting period shall cover a full calendar year (the "Reporting Period"). Transfers of Value (ToVs) made in a specific year will be published before 30th June the year after – i.e. within 6 months after the end of the relevant Reporting Period. The date of payment decides which reporting period the transfer belongs to.
- **WHO:** All EFPIA Member companies must report financial transfers. Recipients: all Health Care Professionals (HCP), Health Care Organizations (HCO) and Patient Organizations (PO). Photocure discloses under the applicable national code or law of the country where the HCP/HCO has its principal practice with the EFPIA Code as the common baseline. Individual enterprises will be treated as HCPs.
- **WHAT:** Direct or indirect payments or other ToVs such as consultancy fees, registration fees, or reimbursements for travel and accommodation in connection with a congress or event.
- **HOW:** The ToVs are collected consecutively through the company's employees who have interaction with HCOs and HCPs and controlled, registered and transfers executed by the accounting department. All related information is treated as sensitive information and is not disclosed in any other ways than described in this document. ToVs are reported from the company's transfer perspective, and not from an income perspective for the recipient. Hence the amount shows the value transferred. All amounts are registered in our accounting system.



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METHODOLOGICAL NOTE (CONT'D)

- **DISCLOSURE'S SCOPE:** Where disclosure is consent-based, recipients may refrain from signing the Consent Form, in which case the amounts are added to an aggregated amount and the identity remains anonymous. Where national law mandates disclosure, publication rests on a legal obligation rather than consent — the recipient cannot opt out into aggregation. The ToVs may be disclosed individually or aggregated:
 - On a category-by-category basis, provided that itemized disclosure shall be made available upon request to (i) the relevant Recipient, and/or (ii) the relevant authorities. *(Section 23.05 EFPIA Code)*
 - Costs related to Research and Development shall be disclosed on an aggregate basis. *(see section 23.05 EFPIA Code)*
 - Individual disclosures reveal name of recipient, amount, type of relationship. Meals and drinks are not separately disclosed under the EFPIA guidelines but are disclosed where national law requires it.
- **METHOD OF DISCLOSURE:** The information will be published on our corporate website www.photocure.com. Where a country requires disclosure on a national platform (e.g. Transparence Sante in France), Photocure discloses on that platform in addition.
- **WITHDRAWAL OF CONSENT:** The consent to publish can be withdrawn by the recipient at any time by contacting us at this address: info@photocure.com. In the event of a withdrawal the name will be removed from the website, and the amount will be transferred to the aggregated amount as soon as possible and within 30 days at the latest.
- **RETENTION OF RECORDS:** Relevant records will be maintained for a minimum of 5 years (Section 23.04 EFPIA Code)
- **REPORTING BASIS:** Cash basis – transfers are attributed to the calendar year of payment.
- **LANGUAGE / CURRENCY:** English; all amounts in Euro, Foreign currencies recalculated to EUR based on full year average exchange rates
- **VAT:** Amounts are reported net of VAT



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