



Proveca Pharma Ltd.
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Proveca Pharma Ltd. Transfer of Value Disclosure 2023

Methodological Note – Germany

Introduction

Proveca Pharma Limited disclose Transfers of Value ('ToVs') made to Healthcare Professionals ('HCPs') and Healthcare Organisations ('HCOs') in line with the requirements of the European Federation of Pharmaceutical Industries Associations ('EFPIA') code and the Freiwillige Selbstkontrolle für die Arzneimittelindustrie e.V. ('FSA') transparency code.

ToVs are payments (e.g. consulting fees) as well as non-monetary benefits (e.g. services of a member company or payments to contracted agencies). Transfers of values can be rendered directly or indirectly in favour of the recipient. Indirect rendering of transfers of values is where they are not made by the member company but rather are provided by a third party for a member company in favour of the recipient.

Definitions

Recipients	<p><u>Healthcare Professional ('HCP')</u> European-based and full-time physicians and pharmacists, as well as any member of the medical, dental, pharmaceutical or other nursing professions who in the course of their professional activities are authorised to prescribe, recommend or use or lawfully trade in medicinal products for human use. This also includes employees of public authorities or employees of the funders responsible at that body for prescribing, procuring, supplying, administering or deciding on the reimbursement of medicines, as well as employees of the member companies who, in addition to working for the company, practise full-time as physicians, pharmacists or other HCPs. It excludes, however, all other employees of a member company, wholesaler or other person trading with pharmaceuticals.</p> <p><u>Healthcare Organisation ('HCO')</u> Any medical or scientific institution or association based in Europe, irrespective of its legal entity, comprising healthcare professionals (e.g. medical learned societies) and/or provides or conducts medical services or research through them (e.g. hospitals, university clinics or further training and research institutions). This also includes institutions through which HCPs render their</p>
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	<p>services (such as consulting firms), irrespective of what position or function the healthcare professionals assume in these organisations. Organisations within the meaning of this Code do not include "Patient Organisations" within the meaning of Section 2 para. 1 of the FSA-Kodex Patientenorganisationen (FSA Code of Conduct Patient Organisations). Independent contract research institutes which are not composed of prescribing healthcare professionals or are connected with medical facilities (e.g. clinical research facilities (CROs)), shall be covered as HCOs by the Code only if member companies provide transfers of value to recipients within the meaning of the Code through such institutions (referred to as "pass-through costs").</p> <p><u>Patient Organisation ('PO')</u> A non-for-profit legal person/entity (including the umbrella organisation to which it belongs), mainly composed of patients and/or caregivers, that represents and/or supports the needs of patients and/or caregivers and which business address, place of incorporation or primary place of operation is in Europe.</p>
<p>Kinds of ToVs</p>	<p><u>Contribution to Costs related to Events</u> Support providing or covering the costs of meals, travel, accommodation and/or registration fees to support the attendance of an individual HCP or PO representative to an Event organised or created by Proveca and/or a Third Party.</p> <p><u>Donations and Grants</u> Funds, assets, or services freely given for the purpose of supporting healthcare, scientific research or education, with no consequent obligation on the recipient to provide goods or services to the benefit of the donor in return.</p> <p><u>Sponsorship</u> Grant of cash or benefits in kind to recipients to the extent that a company's own aims of image promotion or public relations work are pursued thereby. This also includes the renting of booth space and premises as part of external training events.</p> <p><u>Fees for Service and Consultancy</u> ToVs resulting from or related to contracts between Proveca and HCPs/HCOs/POs under which such HCPs/HCOs/POs provide any type of services to Proveca or any other type of funding not covered in the previous categories. Fees, on the one hand, and on the other hand ToVs relating to expenses agreed in the written agreement covering the activity will be disclosed as two separate amounts.</p>

Scope

<p>Products concerned</p>	<p>Prescription-Only Medicines (POMs).</p>
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Companies concerned (Collectively 'Proveca')	<p>Proveca Pharma Ltd 2 Dublin Landings North Wall Quay Dublin 1 D01 V4A3 Ireland</p> <p>Proveca (Germany) GmbH Johannstraße 39 40476 Düsseldorf Deutschland</p> <p>Proveca Ltd WeWork One St Peter's Square Manchester M2 3DE UK</p>
Excluded ToVs	<p>Without limitation, ToVs that:</p> <ul style="list-style-type: none"> I. are solely related to over-the-counter medicines; II. are not listed in Section 23.05 of the EFPIA Code, such as Items of Medical Utility (governed by Article 17), meals (governed by Article 10, especially Section 10.05), Medical Samples (governed by Article 19); or III. are part of ordinary course purchases and sales of Medicinal Products by and between a Member Company and a HCP (such as a pharmacist) or a HCO do not fall within the scope of the disclosure obligation.
ToVs date	Reporting period for ToVs is the calendar year 2023.
Direct ToVs	ToVs made directly by Proveca for the benefit of a Recipient.
Indirect ToVs	ToVs made on behalf of Proveca for the benefit of a Recipient, or those made through a Third Party and where Proveca knows or can identify the Recipient that will benefit from the ToV.
Non-monetary ToVs	No non-monetary ToVs were made during the reporting period.
Cross-border activities	Disclosures must be made pursuant to the National Code of the country where the Recipient has its professional address.
Research and development	ToVs in connection with the planning and performance of non-clinical studies (subject to the OECD Principles on Good Laboratory Prac-tice), Phase I to Phase IV clinical trials (subject to Regulation 536/2014/EC), and non-interventional studies within the meaning of Section 19 para. 1 and 2 of the FSA Code of Conduct Healthcare Professionals.

Legal basis

Consent	
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Form of disclosure

Date of publication	30 th June 2024.
Disclosure platform	Proveca company website.
Disclosure language	German (additionally in English is recommended).

Financial data

Currency	ToVs are disclosed in Euro (€). Where the original payment was made in another currency, the sum is converted to Euro at the exchange rate prevailing at the time of the original payment.
VAT	ToVs are disclosed exclusive of VAT.

[June 2024]