

Proveca Pharma Ltd. 2 Dublin Landings North Wall Quay Dublin 1 D01 V4A3 Ireland

Company Number IE634819

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Proveca Pharma Ltd. Transfer of Value Disclosure 2023

Methodological Note - Italy

Introduction

Proveca Pharma Limited disclose Transfers of Value ('ToVs') made to Healthcare Professionals ('HCPs') and Healthcare Organisations ('HCOs', 'Healthcare Structures') in line with the requirements of the European Federation of Pharmaceutical Industries Associations ('EFPIA') code and the Farmindustria code of conduct.

ToVs can be direct or indirect, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of POM exclusively for human use.

Definitions

Recipients	Healthcare Professional ('HCP')
	Any person who carries out their activity in the medical
	sector, dentistry, public, private or hospital pharmacies,
	any nurses, Administrators or staff of Local Health
	Authorities, any technical or administrative personnel of
	public or private healthcare structures and any other
	person within the scope of their professional activity can
	prescribe, dispense, purchase or administer a medicinal
	speciality and that has their activity mainly in Europe.
	Intermediary pharmaceutical distributors are however
	excluded.
	Healthcare Structure
	Any structure whether it is an association or medical,
	scientific, healthcare or research organisation,
	(independently from its legal form) such as Hospitals,
	Clinics, Foundations, Universities, specialisation and
	training schools (except for patient associations) that
	have their legal headquarters or main office or activity in
	Europe, or through which a Doctor may practice.
	Patient Organisation ('PO')
	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.

Kinds of ToVs	Contribution to Costs related to Events
	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.
	Donations and Grants
	By donations and grants (including free-of-charge leases)
	these must include all the supplies, in cash or kind,
	destined either directly or indirectly to the Healthcare
	Organisations as defined hereafter.
	<u>Sponsorship</u>
	Support provided by or on behalf of Proveca, when
	permitted by law, as a contribution to support an activity
	(including an Event) performed, organised or created by a
	HCO, a PO, or a Third Party.
	Fees for Service and Consultancy
	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.

Scope

Products concerned	Prescription-Only Medicines (POMs).
Companies concerned	Proveca Pharma Ltd
(Collectively 'Proveca')	2 Dublin Landings
	North Wall Quay
	Dublin 1
	D01 V4A3
	Ireland
	Proveca Ltd
	WeWork
	One St Peter's Square
	Manchester
	M2 3DE
	UK
Excluded ToVs	ToVs connected to OTC medicines and those related to
	promotional materials referred to in point 2.13 of the
	Farmindustria Code, to meals and drinks and to medical
	samples.
ToVs date	Reporting period for ToVs is the calendar year 2023.
Direct ToVs	ToVs carried out directly between the company for the
	benefit of the recipient.
Indirect ToVs	ToVs carried out on behalf of the company by a third
	party.

Non-monetary ToVs	There were no non-monetary ToVs 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	The transfers of value connected to the research and development include those activities planned or carried out with the aim of developing non-clinical studies as defined in the Good Laboratory Practices, clinical studies, as governed by Directive 2001/20/CE, and non-intervention studies that are prospective in their nature and that involve the gathering of information on patients by doctors for the study itself.

Legal basis

Consent	
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Form of disclosure

Date of publication	30 th June 2024
Disclosure platform	Proveca company website
Disclosure language	English

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]