



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

Company Number IE634819

Tel: +353 1 513 6233
 Email: info@proveca.com

Proveca Ltd. Transfer of Value Disclosure 2023

Methodological Note - Netherlands

Introduction

Proveca 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 Code for Pharmaceutical Advertising (the CGR).

ToVs are direct or indirect payment, whether in cash, in kind or otherwise or reimbursement provided to HCPs and HCOs.

Definitions

<p>Recipients (EFPIA)</p>	<p><u>Healthcare Professional ('HCP')</u> Any natural person that is a member of the medical, dental, pharmacy or nursing professions or any other person who, in the course of his/her professional activities, may prescribe, purchase, supply, recommend or administer a Medicinal Product and whose primary practice, principal professional address or place of incorporation is in the Netherlands.</p> <p><u>Healthcare Organisation ('HCO')</u> Any legal person/entity</p> <ul style="list-style-type: none"> (i) that is a healthcare, medical or scientific association or organisation (irrespective of the legal or organisational form) such as a hospital, clinic, foundation, university or other teaching institution or learned society whose business address, place of incorporation or primary place of operation is in Europe or (ii) through which one or more HCPs provide services.
<p>Kinds of ToVs (EFPIA)</p>	<p><u>Contribution to Costs related to Events</u></p>

	<p>Support providing or covering the costs of meals, travel, accommodation and/or registration fees to support the attendance of an individual HCP to an Event organised or created by a 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> Support provided by or on behalf of a Member Company, when permitted by law, as a contribution to support an activity (including an Event) performed, organised or created by a HCO or a Third Party.</p> <p><u>Fees for Service and Consultancy</u> ToVs resulting from or related to contracts between Proveca and HCPs/HCOs under which such HCPs/HCOs 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

Products concerned (EFPIA)	Prescription-Only Medicines (POMs).
Companies concerned (Collectively 'Proveca')	<p>Proveca Pharma Ltd 2 Dublin Landings North Wall Quay Dublin 1 D01 V4A3 Ireland</p> <p>Proveca Ltd WeWork No.1 Spinningfields Quay Street M3 3JE Manchester, UK</p>
Excluded ToVs	ToVs to a single recipient totalling €500 or less during the reporting period.
ToVs date	Reporting period is ToVs made in the calendar year 2023.

Direct ToVs (EFPIA)	ToVs made directly by Proveca for the benefit of a Recipient.
Indirect ToVs (EFPIA)	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	There were no non-monetary ToVs made during the reporting period.
Cross-border activities	ToVs made to HCPs/HCOs in the Netherlands as defined above are disclosed regardless of which Proveca company is responsible for the transfer.
Research and development (EFPIA)	ToVs to HCPs or HCOs related to the planning or conduct of <ul style="list-style-type: none"> (i) non-clinical studies (as defined in OECD Principles on Good Laboratory Practice); (ii) clinical trials (as defined in Regulation 536/2014); or (iii) non-interventional studies that are prospective in nature and that involve the collection of patient data from or on behalf of individual, or groups of, HCPs specifically for the study.

Legal basis

CGR Code for Pharmaceutical Advertising	<p>The CGR Code for Pharmaceutical Advertising requires ToVs to HCPs/HCOs defined above as contribution to costs related to events, donations and grants, sponsorship and fees for service and consultancy to be disclosed nominatively.</p> <p>The CGR Code for Pharmaceutical Advertising requires ToVs to HCPs/HCOs defined above as research and development to be disclosed on an aggregate basis.</p>
--	---

Form of disclosure

Date of publication	Mid July 2024
Disclosure platform	https://www.transparantieregister.nl/
Disclosure language	Dutch

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.