

## EFPIA/INFARMA Disclosure Methodology

This methodological note is intended to help readers understand the disclosure of data regarding Transfers of Value (TOV) to Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs) in Poland during the previous calendar year made by Santen Oy S.A. and its affiliates (Santen).

Santen is a Japanese pharmaceutical company specialised in the field of ophthalmology. Founded in 1890, it has gained a market leader position with ophthalmic preparations in Japan. Santen's long-term vision is to achieve global presence in the ophthalmic market by 2020. Part of this strategy involves Europe, where Santen opened new offices dedicated to the treatment of glaucoma, dry eye disease and the development of innovative products, addressing unmet medical needs.

Santen has been present in Europe for about 20 years. It continues to strengthen its position in European countries in order to offer to all patients and healthcare professionals full access to its innovative treatments.

Please find below some information to support the understanding of our disclosure:

Contracts with HCPs / HCOs	Contracts are signed for each specific service provided, for example attendance at an advisory group meeting or a speaker engagement. There may be multi-year contracts between Santen and HCPs or HCOs.
'Donations', 'Grants', and 'Sponsorship'	<p>Santen defines Donation and Grants as "one-way" TOVs: for Donations there is no specific purpose defined for the TOV but for Grants there is a specified purpose. In both cases, the company would not expect to receive a service in return.</p> <p>Santen provides support to HCPs and HCOs, and defines 'Service contracts' and 'Sponsorship' as a "two-way" TOV: in return for the TOV Santen receives defined services, such as a space at a congress for an exhibition stand, consultancy or lecturing. In line with the EFPIA definition of "Sponsorship of HCPs" (Article 13), there is an exception of the "two-way rule" for sponsorship to attend trainings or scientific congresses, for which there is no expected service in return.</p>
Obtaining disclosure consent	Santen encourages all HCPs who receive TOVs to give us their consent to disclose their individual details at the time of the specific TOV, using individual HCP contracts and / or separate disclosure agreements. This is recorded in our contracts database.
Tax considerations	We do not deduct any taxes from our TOVs, but we make it clear in our HCP contracts that taxes where applicable must be paid by the HCP
VAT	VAT is not paid on fees to HCPs, but is included in the payment of expenses
Currency	Most of our TOVs are paid in złoty, but where TOVs were made in other currencies, these were converted to złoty at the prevailing exchange rate.
Cross-border payments	TOVs from other Santen affiliates in favor of HCPs in Poland are included in the published report.
Non-monetary transfers of value	Santen may make non-monetary transfers of value in Poland. Where applicable, an equivalent amount in złoty is published in the report.