

**Disclosure of Transfers of Value by Swixx Biopharma EOOD to healthcare professionals (HCPs) and Healthcare Organizations (HCOs)**

Swixx Biopharma EOOD discloses all transfers of value made towards HCPs and HCOs in accordance with the European Federation of Pharmaceutical Industries and Associations (EFPIA) Disclosure Code and the ARPharM Code for Disclosure of Transfers of Value by Pharmaceutical Companies to HCPs and HCOs.

The published data represents the amount which was transferred to the corresponding HCO or HCP within the calendar year 2019. The value was calculated based on costs incurred and is consistent with the described below methodology used in preparing the disclosures.

Disclosure is made on this website: [www.swixxbiopharma.com](http://www.swixxbiopharma.com), in the section „Country pages“ and on ARPharM’s website through a link:

<http://www.transparencybg.org/index.php?id=724> that direct users to the website of Swixx Biopharma ([www.swixxbiopharma.com](http://www.swixxbiopharma.com))

This document summarizes the used methodology for transfers of value.

Swixx Biopharma EOOD fully supports the principle of transparency and complies with privacy laws. The Privacy Act requires Swixx Biopharma EOOD to obtain permission from individual HCPs before individual transfer of values are disclosed to them. In other words, the consent decision is not specific to a transaction or activity, but applies to the HCPs in respect of all value assignments and the positive decision remains in force until withdrawn.

If the HCP does not grant permission for such individual Disclosures, Swixx Biopharma EOOD discloses the total amount of all transfer of values in the relevant category as a cumulative amount.

Swixx Biopharma EOOD discloses transfer of value to HCPs and HCO, which operate in Bulgaria, in BGN. When the transfer of value is made in a currency other than BGN, the amount will be converted into BGN according to the exchange rate.

All disclosures will be made available in English and in Bulgarian language.

Per the guidance from EFPIA, Swixx Biopharma EOOD will ensure that all the transfer of values required to be disclosed must be documented and retained for a minimum of 5 years or longer after the end of the relevant reporting period, unless a shorter or longer period is required under applicable national data privacy or other laws or regulations.

**Definitions:**

Healthcare Professionals (HCP): any of the following:

medical doctors, doctors of dental medicine, master pharmacists, nurses, midwives, medical laboratory technicians, paramedics and doctor's assistants, assistant-pharmacists or any other person who in the course of his/her professional activity could prescribe, purchase, supply or administer medicinal products and whose main practice, practice address or place of registration is in Europe.

For the avoidance of doubt, the definition of a healthcare professional includes:

1. any officer or employee of a government agency or other organization (public or private), which have the right to prescribe, purchase, supply, recommend or administer medicinal products,
2. any employee of the Swixx Biopharma EOOD whose main activity is the medical practitioner, but excluding:
  - any other employees of the Swixx Biopharma EOOD and
  - a wholesaler and distributor of pharmaceutical products.

Healthcare Organization (HCO): any health organization, or medical or scientific organization or association (regardless of its legal or organization form), such as a hospital under the Bulgarian Act for hospitals, or foundation, university or other educational institution, or professional or scientific society (with the exception of patient organizations according to the

Code for PO), whose registered office, place of incorporation or primary place of business in Europe, or in which one or more healthcare professional provide services.

Recipient: Any HCP or HCO, as applicable, in each case, whose primary practice, principal professional address or place of incorporation is in Europe.

Transfers of Value: Direct and indirect Transfers of Value, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of generic or branded prescription-only Medicinal Products exclusively for human use. Direct Transfers of Value are those made directly by Swixx Biopharma EOOD for the benefit of a Recipient. Indirect Transfers of Value are those made by a third party (such as contractors, agents, partners or affiliates - including foundations) on behalf of Swixx Biopharma EOOD for the benefit of a Recipient, where the identity of the Company is known to or can be identified by the Recipient.

**Methodology:**

1. Disclosure has been made based on the Invoice and/or Deposit Proof.
2. The date taken into account for the purposes of the disclosure is the date of the legal document for benefits actually paid during the calendar year 2019.
3. The disclosure of transfers of value is made either on an individual or on an aggregate basis. For the HCPs and HCOs who have not given consent for individual disclosure, the disclosure of transfers of value is made on an aggregate basis. In case of refusal or inability of HCP to attend an event or in case of cancellation of the event by HCO, the data are not subject to disclosure.
4. Transfers of Value that are disclosed (where applicable):
  - Registration fees: includes event registration fees, VAT and other applicable fees where required,
  - Travel expenses: includes the cost of transport, including air ticket/train/bus

tickets, car rental, car services and taxi transfers ,

- Accommodation: Hotel lodging and breakfast (if the breakfast is included in the room rate), city taxes and tourist fees if any,
- Fees for Service and Consultancy Fees: include the gross amount paid (comprises the net amount plus any applicable taxes). Transfer of values resulting from or related to contracts between Swixx Biopharma EOOD and institutions, organisations, associations or HCPs under which such institutions, organisation, association or HCPs provide any type of services to Swixx Biopharma EOOD or any other type of funding not covered in the previous categories,
- Donations and Grants to HCOs - all costs that are part of the contract between the Swixx Biopharma EOOD and the health care organization, such as contributions to support initiatives in HCP education, healthcare systems and practices,
- Sponsorship agreements with HCOs/third parties appointed by HCOs to manage an Event/Conference/Congress (commercial sponsorship) - the amount transferred to the HCO in return to which the Swixx Biopharma EOOD has received the opportunity to participate in the event (place for a booth, advertising and / or time for symposium), plus applicable tax.