



Disclosure 2019

Methodological Note

For Sanofi

Cyprus

INTRODUCTION

This Methodological Note describes the main Sanofi processes and methods used to prepare this annual disclosure report on transfer of value to HCP/HCO for 2019.

The EFPIA Disclosure Code requires all European Federation of Pharmaceutical Industries And Associations (EFPIA) member companies to disclose transfers of value (TOV) such as support to attend medical education events, speaker fees and consultancy to healthcare professionals (HCPs) and healthcare organizations (HCOs), wherever they might come from (inside or outside the country).

WHAT ARE THE KEFEA CODE REQUIREMENTS?

The Cyprus Association of Research & Development Pharmaceutical Companies (KEFEA) Disclosure Code requires that European affiliates of EFPIA-Member companies collect and disclose transfers of value made to European HCPs and HCOs wherever they come from (inside or outside the country).

KEFEA has translated the requirements of the EFPIA Disclosure Code in Article 24.3 of the KEFEA Code of Conduct which states that the transfers of value which are declarable are:

- Donations, grants provided to institutions, organisations, and associations
- Contributions towards the costs of meetings paid to healthcare organisations or to third parties managing events on their behalf including sponsorship of HCPs by way of registration fees and accommodation and travel
- Sponsorship of HCPs to attend scientific events
- Contracts between companies and institutions, organisations and association for any type of service or consultancy

HOW WAS THE DISCLOSURE OF LOCAL TRANSFERS OF VALUE ORGANIZED?

Data from various sources were captured in a commercially available web-based solution, called NAYA (BMI SYSTEM) which was customized to the Sanofi organization globally. Source include:

- Financial System (SAP) for HCOs master data & direct TOVs
- CRM system (MI) for HCP master data
- Upload of excel files manually completed based on information received from internal & external sources.

HOW WAS THE DISCLOSURE OF CROSS-BORDER TRANSFERS OF VALUE ORGANIZED?

Sanofi has disclosed TOVs that were paid to Cypriot HCOs and HCPs by International Affiliates during the period 1 January 2019 and 31 December 2019.

Where a Cypriot HCP was contracted prior to 2019 by an International Affiliate, but actually received their TOV in 2019, the 2019 Disclosure report includes these TOVs. Where a Cypriot HCP was contracted by an International Affiliate to provide a service in 2019, he/she would have received the benefit of the related expenses i.e. costs of flights, accommodation, and transportation in 2019. These TOVs will be disclosed in the Disclosure Report 2019. However, it should be noted there are instances where an International



Affiliate may not have paid the fee for service to a Cypriot HCP for an engagement in 2019 until 2020. Therefore, it is possible that for an individual HCP there will only be related expenses listed that were paid to them in 2019 in the Disclosure Report 2019, and the fee for service paid in 2020 will be listed in the Disclosure Report 2020.

SPECIFIC TRANSFERS OF VALUE

All transfers of value made by Sanofi to Cypriot HCPs or HCOs between January 1st and December 31st, 2019 and corresponding to one of the categories described below.

DONATIONS AND GRANTS TO HCOs

Sanofi considered applications from HCOs for Medical and Educational Goods and Services (MEGS) throughout the course of 2019. Sanofi made grants to HCOs in 2019 where it served to enhance patient care or medical knowledge.

Grants, donations or other contributions to Patient Organisations and Patient Groups as these follow the EFPIA Code of practice governing industry relationships with patient organisations and are disclosed separately on Sanofi's corporate website available at:

http://en.sanofi.com/csr/approach/stakeholders/patient_associations/patient_associations.aspx

SPONSORSHIP OF ATTENDANCE BY HCPs AT MEETINGS

Sanofi received a number of applications from individual HCPs requesting sponsorship to attend meetings during the course of 2019. For the purpose of disclosure, this category includes any kind of scientific or educational events (congresses, conferences, symposia, advisory board meetings, training meetings, round table discussion, etc) regardless of the number of participants.

Sanofi has via a third party agency (congress agencies, travel agencies, and congress organizers) organized group events whereby HCPs were sponsored to attend meetings during the course of 2019. In these cases the costs of sponsorship were paid directly to the third party agency by Sanofi with the TOV being disclosed against the individual HCP where he/she has given consent.

The following should be noted when considering the Disclosure Report 2019 with respect to these:

- Sanofi has recorded the date of TOV as the date of the meeting in the case of group events.

Sanofi excludes transfers of value from disclosure in the cases of no-shows and last-minute cancellations as no characterized benefit was provided to the HCP.

FEES AND EXPENSES PAID TO HCPs OR TO THEIR EMPLOYER ON THEIR BEHALF

Sanofi has contracted with HCPs to provide consultancy services and the ToVs are disclosed under the name of the HCP,

CONTRIBUTION TOWARDS THE COSTS OF MEETINGS PAID TO HCOS OR TO THIRD PARTIES MANAGING EVENTS ON THEIR BEHALF

During the course of 2019 Sanofi has support meetings organized by HCOs. Sanofi has contracted with the HCO's declaring the specific contributions. The HCO has been clearly informed of Sanofi's obligation to disclose such payments. Support has included:

- Contribution to cost of events
- Payments of advertisement

The following should be noted when considering the Disclosure Report 2019 with respect to these:

- Sanofi has recorded the date of TOV as the date the payment was released by Sanofi to the HCO
- If an event was held in 2019 but Sanofi did not receive an invoice in 2019 or an invoice was received in 2019 but which was not paid in 2019, the TOV will not appear in the 2019 Disclosure Report. Where the invoice will be paid in 2020, the TOV will be recorded in Sanofi's 2020 Disclosure Report.

HOW IS THE DISCLOSURE OF FINANCIAL DATA MANAGED?

WHICH ACTUAL DATES ARE USED FOR DISCLOSURE OF TOV?

The disclosure of transfer of value for 2019 includes all payments done during 2019 and transfers of value related to events held in 2019. For transfers of value linked to an event with different types and dates of expenses (congress registration, flight tickets, hotel bills, etc.) all these transfers of value are reported with the same date, i.e., the 1st day of the event.

HOW ARE THE CURRENCIES AND EXCHANGE RATES MANAGED?

- Transfers of value are disclosed in euro (EUR).

HOW IS THE VAT MANAGED?

The TOV reported is inclusive of all taxes and deductions.

HOW WAS THE HCP INFORMED CONSENT MANAGED?

In order to legally disclose TOV data on an individual named basis, Sanofi has obtained consent from the HCPs concerned by including the informed consent notice in the letter of agreement signed by the HCP. Consent has been obtained on a per engagement basis. The informed consent notifies the HCP of how Sanofi will use their personal information and explains that with their consent this information (including the payments or other TOV made by Sanofi under the agreement) will be publicly disclosed in accordance with the requirements of the KEFEA Code of Conduct. HCPs have been informed the exact sums that will be disclosed. HCPs information will be disclosed in the aggregated disclosure if the consent has not been given. It is Sanofi's policy that partial consent (the disclosure of some but not all engagements) is not permitted.



HCPs are legally entitled to withdraw their consent at any time by writing to the dedicated Sanofi Disclosure email address and requesting that their personal information is not publically disclosed. In such cases, all transfer of value data will be removed from the individual disclosure and will be disclosed in aggregate.

CONTACTS

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