

## UAB "SICOR BIOTECH"

## EFPIA DISCLOSURE - METHODOLOGICAL NOTES FOR 2017

	<b>Teva Approach</b>
<b>Background</b>	<ul style="list-style-type: none"> <li>UAB „Sicor Biotech“ as Responsible Citizen and committed organization in the Healthcare Sector is publishing a Transfers of Value report in order to meet transparency obligation and to demonstrate the Company's values.</li> </ul>
<b>Applicable Code</b>	<ul style="list-style-type: none"> <li>This Transfers of Value report is made according to Code of Ethics for Pharmaceutical Marketing in Lithuania.</li> </ul>
<b>Transfers of Value</b>	<ul style="list-style-type: none"> <li>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 Medicinal Products exclusively for human use. Direct transfers are those made directly by a Company for the benefit of a Recipient. Indirect transfers are those made on behalf of a Company for the benefit of a Recipient through an intermediate and where the Company knows or can identify the HCP/HCO that will benefit from the Transfer of Value.</li> </ul>
<b>Recipient of Transfer of Value</b>	<ul style="list-style-type: none"> <li>Any HCP or HCO whose primary practice, principal professional address or place of incorporation is in Lithuania. <ul style="list-style-type: none"> <li>HCO: Any legal person (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 (except for patient organisations within the scope of Annex C of the CEPM Code, "Code of Ethics in the Relations between the Pharmaceutical Industry and Patient Organisations") whose business address, place of incorporation or primary place of operation is in Europe or (ii) through which one or more HCPs provide services.</li> <li>HCP: Any natural person that is a doctor, a member of medical, dental, pharmacy or nursing professions or any other person who, in the course of his or 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 Lithuania. For the avoidance of doubt, the definition of HCP includes: (i) any official or employee of a government agency or other organisation (whether in the public or private sector) that may prescribe, purchase, supply or administer medicinal products and (ii) any employee of a member Company whose primary occupation is that of a practising HCP, but excludes (x) all other employees of a Member Company and (y) a wholesaler or distributor of medicinal products.</li> </ul> </li> </ul>
<b>Recipient's home country principle</b>	<ul style="list-style-type: none"> <li>Transfers of Value report includes not only Transfers of Value made to Recipients by UAB „Sicor Biotech“ but also Transfers of Value made to Recipients by foreign Teva affiliates.</li> </ul>
<b>Self-incorporated HCP</b>	<ul style="list-style-type: none"> <li>If the contracting party is a company owned by an HCP, the amount is disclosed as Transfer of Value to the HCO (the company).</li> </ul>
<b>Excluded Transfers of Value</b>	<ul style="list-style-type: none"> <li>Without limitation, Transfers of Value that (i) are not listed in Code of Ethics for Pharmaceutical Marketing, such as items of medical utility, meals and drinks, medical samples; and (ii) are part of ordinary purchases and sales of Medicinal Products by and between a Company and HCP (such as a pharmacist) or an HCO do not fall within the scope of the disclosure obligation.</li> </ul>
<b>Date of Transfer of Value</b>	<ul style="list-style-type: none"> <li><b>Donations and grants:</b> <ul style="list-style-type: none"> <li>Monetary donation/grant: date of payment</li> <li>In-kind donation/grant: date of the in-kind donation/grant provision</li> </ul> </li> <li><b>Contributions to costs of events:</b> <ul style="list-style-type: none"> <li>Sponsorships agreements with HCOs: start date of event</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ Registration fees, travel, accommodation: start date of event</li> <li>● <b>Fee for service and consultancy:</b> <ul style="list-style-type: none"> <li>○ Fees           <ul style="list-style-type: none"> <li>▪ Fees linked to an event: start date of event (including services or consultancy provided by HCP/HCO (the value transferred is declared on the date when the service or consultation was performed))</li> </ul> </li> <li>○ Travel, accommodation: start date of event</li> </ul> </li> </ul>
<b>Meals</b>	<ul style="list-style-type: none"> <li>● Meals disclosure is not required but these Transfers of Value may be included in the Travel &amp; Accommodation amounts.</li> </ul>
<b>Transfer of Value in the case HCP finally does not participate at event</b>	<ul style="list-style-type: none"> <li>● In the case registration fee is paid and travel and/or accommodation is booked but the HCP does not attend an event, no Transfer of Value is disclosed to that HCP.</li> </ul>
<b>Transfer of Value provided to agency to support HCO's event</b>	<ul style="list-style-type: none"> <li>● Transfer of Value is reported for that HCO even if the Transfer of Value is actually provided only to an agency which organizes an event for the HCO.</li> </ul>
<b>Transfer of Value provided to HCO but ultimate recipients are HCPs</b>	<ul style="list-style-type: none"> <li>● Transfers of Value are reported for those HCPs if Teva knows or can identify HCPs that benefit from the Transfer of Value.</li> </ul>
<b>Multi-Year Contracts</b>	<ul style="list-style-type: none"> <li>● Transfers of Value are reported on the relevant date of payment or start date of event (see above), irrespective of the duration of the contract.</li> </ul>
<b>Value Added Tax (VAT)</b>	<ul style="list-style-type: none"> <li>● HCP           <ul style="list-style-type: none"> <li>○ If the copyright agreement has been concluded with HCP, the indicated amount is with taxes (GMP 15% and SODRA 9%)</li> <li>○ If the service contract has been signed, the declared amount is the one indicated on the invoice. If the HCP has a business certificate, then it is the amount indicated in the receipt, i.e. without VAT.</li> </ul> </li> <li>● HCO           <ul style="list-style-type: none"> <li>○ Contribution to costs related to Events, through HCOs or third parties or Fees for Service and Consultancy are declared without the VAT.</li> </ul> </li> </ul>
<b>Currency Conversions</b>	<ul style="list-style-type: none"> <li>● All Transfers of Value are disclosed in local currency.</li> <li>● If a payment is captured in another currency, it is converted into local currency by applying the exchange rate for the month that is deemed to be the Date of Transfer of Value using Teva's official exchange rate.</li> </ul>
<b>Disclosure Period</b>	<ul style="list-style-type: none"> <li>● Each reporting period covers a full calendar year.</li> <li>● Transfers of Value are reported for all activities that take place in a given calendar year and for which an affiliate receives an invoice and makes a payment before the end of January next year.</li> </ul>
<b>Consent</b>	<ul style="list-style-type: none"> <li>● Teva collects consents for each relevant HCP/HCO interaction that should be disclosed individually by means of the contract or by means of a separate document, based on the local requirements.</li> <li>● Teva documents any consent revocation or opt-out.</li> <li>● If HCP's consent is not given or is withdrawn, Transfer of Value for that HCP is disclosed in aggregate and the Recipient's identity is therefore not publicly available.</li> <li>● If HCP revokes consent with any single Transfer of Value, all Transfers of Value provided to this HCP are included in the aggregate disclosure.</li> </ul>

<b>Disclosure Language</b>	<ul style="list-style-type: none"><li>• Disclosures are made in Lithuanian and in English.</li></ul>
<b>Complaints or request for further information</b>	<p>All complaints or requests for further information can be submitted locally to our email: <a href="mailto:info@teva.lt">info@teva.lt</a>, which is supervised by office administrator. Office administrators then would record the report in One Trust system and additionally will ask responsible people for support (employee who is submitting the reports, lawyer and (or) compliance manager).</p> <p>In case of general data protection questions or requests, the contact person – Data Protection Officer, which can be contacted by email: <a href="mailto:EUprivacy@tevaeu.com">EUprivacy@tevaeu.com</a>.</p>
<b>Media Contact</b>	All questions can be submitted locally to our email: <a href="mailto:info@teva.lt">info@teva.lt</a> , which is supervised by office administrator.



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