

EFPIA Disclosure Code 2020 Self-Certification Scheme

Healthcare professionals (HCPs) and healthcare organisations (HCOs) with whom Grünenthal works provide the Pharmaceutical Industry with valuable, independent and expert knowledge derived from their clinical and management experience. As owners of scientific knowledge and experts in medicinal products, pharmaceutical companies can be a unique resource to the healthcare systems and providers, which will ultimately benefit the patients.

Throughout the medicines life cycle pharmaceutical companies work with scientists and HCPs. These collaborations are essential in addressing patient needs. Industry and HCPs collaborate in a range of activities from clinical research to sharing best clinical practice and exchanging information on how new medicines fit into the patient pathway.

EFPIA and its member associations have adopted codes and guidelines to ensure that the interactions of their member companies with HCPs and HCOs meet the high standards of integrity and transparency. Building greater transparency to the relationships between pharmaceutical companies and HCPs/HCOs aims to building understanding of the collaboration and recognition of its value to patient care.

EFPIA and its members are fully committed to implement and apply the highest ethical standards. Despite the exceptional circumstances related to COVID-19, Member Companies made their best efforts to disclose the relevant information for 2019.

Except in countries where disclosure is prescribed by laws, Grünenthal hereby confirms that its disclosures of transfers of value (ToVs) to HCPs and HCOs made in 2019 have been reported in application of the EFPIA Disclosure Code following key principles:

Disclosure quality

Grünenthal certifies that:

- Its disclosures are made in each country where it operates;
- Its disclosures include direct and indirect ToVs, as defined in the codes and associated guidance issued by EFPIA;
- Its Methodological Note describes the process it has followed in order to compile the data hereby disclosed.

Methodology used for the collection and organisation of ToVs is in line with the EFPIA Disclosure Code's requirements and applicable codes

Grünenthal certifies that:

- Data collection complies with the requirements of the EFPIA Disclosure Code;
- Actions are taken to ensure individual disclosure for HCPs and HCOs' transfers of values (each as defined in the EFPIA Disclosure Code).

Aggregate disclosures are limited to Research and Development ToVs and such ToVs that cannot be disclosed on an individual basis for legal reasons

Grünenthal certifies that aggregate disclosure is limited to the following topics:

- Research and Development Transfers of Value (as defined in the EFPIA Disclosure Code);
- Transfers of Value to Recipients that have opposed to the publication on grounds of the protection of their private data;
- If an HCP or HCO (where applicable) has provided consent to individual disclosure only in respect of part of the Transfers of Value he/she/it received, all Transfers of Value to such HCP or HCO (where applicable) are being disclosed in the aggregate.

Ensuring compliance with Data Privacy Obligations

Grünenthal certifies that its disclosure complies with the Data Privacy obligations.

Date: 23.06.2020

Name of signatory: Gabriel Baertschi

Position in the Company: Chief Executive Officer

A handwritten signature in black ink, appearing to read 'G. Baertschi', written over a horizontal line.

Signature (Gabriel Baertschi)