Grünenthal Italia S.r.l. - Methodological Note

Guidelines for Implementing the Patient Organization Disclosure

Preamble

Grünenthal Italia S.r.l. is committed to operating according to the highest ethical standards and ensuring maximum transparency in its activities, including the transfer of value (ToV) to patient organization it collaborates with.

Every year, within the first quarter, Grünenthal Italia S.r.l. publishes the list of patient associations it has collaborated with in the previous year.

Our approach

The reports will include the following information:

- Full name of the organization.
- A brief description of the type of support provided.
- Year of contribution.
- Year of related collaboration.
- Amount of financial support, calculated using the cash basis method and published net of VAT.

Definitions

Patient Organization (PO): non-for-profit legal person/entity (including the umbrella organization to which it belongs), mainly composed of patients and/or caregivers, that represents and/or supports the needs of patients and/or caregivers and which business address, place of incorporation or primary place of operation is in Europe.

Patient Organization Representative: is a person who is mandated to represent and express the collective views of a PO on a specific issue or disease area.

Transfers of Value (ToV): Direct and indirect ToV, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of POM exclusively for human use. Direct ToVs are those made directly by a Member Company for the benefit of a Recipient. Indirect ToVs are those made on behalf of a Member Company for the benefit of a Recipient, or those made through a Third Party and where the Member Company knows or can identify the Recipient that will benefit from the Transfer of Value.