

## EFPIA Disclosure Code 2017 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 pharma companies work with scientists and healthcare professionals. These collaborations are essential in addressing patient needs. Industry and healthcare professionals 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 healthcare professionals and organisations meet the high standards of integrity and transparency. Building greater transparency to the relationships between pharma companies and HCPs/HCOs aims to building understanding of the collaboration and recognition of its value to patient care.

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 2016 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 were taken to seek consent from HCPs and HCOs (each as defined in the EFPIA Disclosure Code), where applicable.

**Vorsitzender des Aufsichtsrates:**  
Dr. Wilhelm Moll LL.M.

**Geschäftsführer:**  
Gabriel Baertschi (Vorsitzender)  
Sascha Becker  
Dr. Klaus-Dieter Langner

**Sitz der Gesellschaft:**  
Aachen

**Registergericht:**  
Amtsgericht Aachen  
HRB Nr. 3546

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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.

### Seeking the consent of Recipients

Grünenthal certifies that it has used all reasonable steps for the purpose of obtaining consent to individual disclosure where such consent is required by applicable law.

Date: 20.06.2017

Name of signatory: Gabriel Baertschi

Position in the Company: Chief Executive Officer

Signature:



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