

Celgene Sp. z o.o.

Methodological Statement

summarizing the methodologies used in preparing the disclosure of transfers of value to health professionals and healthcare organisations pursuant to Article 12 of the Code of the Association of Pharmaceutical Manufacturers in Estonia on the promotion of prescription medicines and cooperation with healthcare professionals (the “APME code”)

Introduction

Celgene Sp. z o.o. (*Celgene*) is responsible for the marketing of Celgene medicinal products in Estonia.

Celgene also collaborates both directly and through its parent company, Celgene Corporation¹, in pre-clinical research and clinical trials in Estonia.

In the course of these activities, Celgene engages with healthcare professionals² whose registered practice addresses are in Estonia and/or who are based in Estonia.

Celgene disclosures regarding the Estonian jurisdiction published at Celgene Corporation website represent the transfers of value that Celgene has made to such health professionals and healthcare organisations during the course of 2020 insofar as those transfers of value fall within Celgene’s disclosure obligations as defined in Article 12 of the APME Code.

Methodology

The data upon which Celgene’s disclosures are based has been collected and compiled by Celgene Corporation’s Spend Transparency Office based in Summit, New Jersey. The Spend Transparency Office is responsible for the disclosure of transfers of value to health professionals and healthcare organisations made by any Celgene Corporation affiliate worldwide in accordance with relevant local laws and codes of practice.

In order to prepare for compliance with Article 12 of the APME Code, the Spend Transparency Office first identified all of the possible sources of information within the Celgene Corporation finance system and held by third party vendors that could identify any and all payments made by Celgene. Using information supplied by IMS Health, verified and supplemented by various commercial operations resources within Celgene and Celgene Corporation, publically available information and information from third party vendors, the Spend Transparency Office narrowed down the list of payees to those that fell within the definitions of health professional, other relevant decision makers and healthcare

¹ For the purposes of this document alone, the term “Celgene Corporation” refers to Celgene Corporation and all of its affiliates, sub-contractors and agents worldwide.

² As defined in APME Code section „Scope of APME Code“.

organisation, as set out in the APME Code. Celgene used the IMS OneKey Code as a unique identifier of any given health professional.

On the basis of these data Celgene has used its best endeavors to disclose on its website all direct and indirect transfers of value made between 1 January 2020 and 31 December 2020 inclusive that fall within its disclosure obligations as set out in Article 12 of the APME Code, applying the relevant definitions contained therein. Celgene undertakes to submit promptly to the APME any corrections or additions that may be required as a result of knowledge acquired after the date the disclosures are submitted.

Third parties

Celgene has included in its contractual templates, on the basis of which it contracts with all third parties, a binding clause requiring the third party to notify to Celgene all transfers of value made to health professionals and healthcare organisations. Celgene has used its best endeavours to include all such transfers of value so notified within the scope of its disclosures.

Distributors

Celgene does not market its products through a distributor in Estonia.

Cross border transactions

Celgene Spend Transparency Office has worked with all of Celgene's functions and affiliates worldwide to capture data relating to transfers of value made by them to health professionals with their practice address in the Estonia and healthcare organisations based in Estonia. Celgene has used its best endeavors to include all such transfers of value within its disclosures.

Consent

Celgene has used its best endeavors to seek consent from all health professionals to disclosure on an individual basis, naming the recipient and identifying the value of the transfer. To this end, Celgene has incorporated a binding clause to this effect in its contractual templates on the basis of which, pursuant to Celgene's relevant policies, all such engagements should proceed.

In the event that a health professional has declined to give their consent to such individual disclosure, the Vice President, General Manager of Celgene, or his designee, has considered in each case whether there is an overriding need to pursue the potential engagement with the result that any transfer of value may only be disclosed in aggregate pursuant to Section 4 of the Appendix C to the APME Code. Factors that are relevant to this consideration include whether the health professional has special knowledge and skills that are not available to Celgene from another health professional willing to give consent to individual disclosure.

In circumstances where a health professional declines to give, or subsequently withdraws, consent to one or more transfers of value in the course of the 2020 reporting year, Celgene has disclosed all

transfers of value made to that health professional in aggregate. Such aggregate disclosure shall identify the number of recipients covered by such disclosure, absolute basis and a percentage of all recipients and the aggregate amount attributable to transfers of value to such recipients.

Disclosure in aggregate

Where the recipients of transfers of value cannot be disclosed for legal reasons, including where a health professional has declined to give consent to disclosure on an individual basis, Celgene has disclosed those transfers of value on an aggregate basis. Such aggregate disclosure shall identify the number of recipients covered by such disclosure, absolute basis and a percentage of all recipients and the aggregate amount attributable to transfers of value to such recipients.

Celgene has also disclosed on an aggregate basis transfers of value falling within the definition of “*Research and Development Transfers of Value*” pursuant to Article 12.04 of the Code.

Currency

Celgene has made its disclosures in euros, using a published monthly average exchange rate for those payments made in any other currency.

Tax

Celgene has made its disclosures relating to direct transfers of value exclusive of all applicable taxes. It is possible, however, that some indirect transfers of value made by third party vendors have been reported to us inclusive of taxes.

Scientific Publications

Celgene adheres to laws and industry standards for financial transparency reporting. External Authors of scientific publications receive an in-kind transfer of value when Celgene pays a publication agency to provide medical writing and editorial services to the external authors at no cost to them. Celgene will report funding for medical writing and editorial services, and payment of congress and journal fees.

Date methodology

Celgene has made its disclosures relating to payments by reference to the payment date. In circumstances where transfers of value represent benefits in kind Celgene has made its disclosures by reference to the date of the event.

Multi-year contracts

Celgene has not identified any multi-year contracts that fall within its disclosure obligations for 2019.

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