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Jazz Pharmaceuticals: Methodological Note for HCP/HCO Disclosure 2025

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Jazz Pharmaceuticals is committed to transparency, integrity and responsible collaboration with the healthcare community. Constructive engagement with Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs) is essential to advancing scientific knowledge, supporting medical education and improving patient outcomes. These interactions are governed by robust internal controls and industry standards to ensure they are appropriate, ethical and patient-focused.

Jazz Pharmaceuticals is an affiliate member of the European Federation of Pharmaceutical Industries and Associations ("EFPIA") and is committed to the EFPIA Code on Disclosure of Transfers of Value from Pharmaceutical Companies to Healthcare Professionals and Healthcare Organisations (the "EFPIA Disclosure Code"). The EFPIA Disclosure Code is implemented in Luxembourg through the Innovative Medicines for Luxembourg ("IML") Code of Ethics, administered by Innovative Medicines for Luxembourg ("IML").

Jazz Pharmaceuticals publicly discloses certain Transfers of Value ("ToVs") made to HCPs and HCOs in Luxembourg in accordance with these obligations. This Methodological Note accompanies Jazz Pharmaceuticals' 2025 disclosure (published in 2026) and has been prepared in line with the mandatory standardised EFPIA structure applicable from 2025 onwards. It explains the scope of recipients included, the categories of ToVs disclosed, and the methodologies applied in identifying, calculating and reporting those transfers.

By providing this information, Jazz Pharmaceuticals aims to support informed interpretation of its disclosure data and reinforce public confidence in its relationships with the healthcare community.

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1. Definitions

1.1 Recipients

This subsection defines the individuals and organisations within scope of disclosure. The definitions reflect the EFPIA Disclosure Code and the IML Code of Ethics, and clarify how Jazz Pharmaceuticals determines recipient classification in Luxembourg.

Healthcare Professionals (HCPs)

An HCP is a member of the medical, dental, pharmacy or nursing professions and any other person who, during their 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 Luxembourg. A qualified healthcare professional is a person who holds the relevant licence required to practise in Luxembourg. For the avoidance of doubt, the definition of HCP includes:

- 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;

- 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.

The employment status of a healthcare professional does not affect Jazz Pharmaceuticals' disclosure obligations; accordingly, retired HCPs holding a licence to practise fall within scope. Transfers of Value to deceased HCPs are disclosed where the transfer occurred during the reporting year.

Where HCPs are employed directly and exclusively by Jazz Pharmaceuticals, their salary and benefits are outside the scope of disclosure.

Healthcare Organisations (HCOs)

An HCO is a healthcare, medical or scientific association or organisation (e.g., a hospital, clinic, foundation, university or other teaching institution or learned society) whose business address, place of incorporation or primary place of operation is in Luxembourg, or an organisation through which one or more HCPs provide services. Consistent with Jazz Pharmaceuticals' established methodology, this includes:

- hospitals (public and private);
- General Practitioner (GP) practices and other places of work for HCPs treating patients or providing associated advice or management services related to the treatment of patients;
- medical societies (international, national or local) and all networks or associations of HCPs;
- universities, teaching institutions and learned societies.

Private companies such as medical education agencies, or suppliers of locum or "temp" nurses, are not classified as HCOs for the purposes of this disclosure, particularly where the majority of employees are not HCPs. The treatment of payments to such entities is addressed in Sections 2.6 (Indirect ToVs) and 3.2 (Self-incorporated HCP).

If a healthcare organisation consists of only one healthcare professional or other relevant decision maker, it is subject to the requirements in the EFPIA Disclosure Code and IML Code of Ethics applicable to individual HCPs (see Section 3.2).

Patient Organisations

Jazz Pharmaceuticals does not classify Patient Organisations as HCOs for the purposes of transparency reporting. Transfers of Value provided to Patient Organisations are disclosed separately within Jazz Pharmaceuticals' Patient Organisation report on the Jazz Pharmaceuticals corporate website.

Patients, journalists and members of the public

Members of the public, including patients and journalists, are not considered HCPs under Jazz Pharmaceuticals' transparency reporting framework. Transfers of Value provided to members of the public, where applicable, are disclosed separately and do not form part of this disclosure.

1.2 Kind of ToVs

This subsection defines the categories of Transfers of Value that may be disclosed under the EFPIA Disclosure Code and the IML Code of Ethics. Transfers of Value may be made directly or indirectly, in cash or in kind, and may arise in connection with promotional or non-promotional activities relating to prescription-only medicines.

For the purposes of disclosure, Jazz Pharmaceuticals applies the EFPIA-defined ToV categories. ToVs are classified into the following categories:

ToVs to HCPs

- Congress and educational event registration fees: expenses related to the registration of an HCP to attend a congress or educational event.
- Travel: expenses related to the provision of travel to HCPs in relation to a fee for service contract (e.g., rail travel, taxi travel, flights, reimbursement of private car miles) or to their attendance at a congress or educational event. Where travel expenses are required for the provision of a fee for service, these are disclosed in the category "Contracted Services – Expenses". Where the travel relates to attendance at a congress or educational event, it is disclosed in the category "Travel and accommodation".
- Accommodation: expenses related to the provision of overnight accommodation of HCPs in relation to a fee for service contract or to their attendance at a congress or educational event. These are disclosed under "Contracted Services – Expenses" where they are required for the provision of expert advice and a fee for service. Where they relate to attendance at a congress or educational event, they are disclosed under "Travel and accommodation".
- Fees: ToVs paid to HCPs to provide services to Jazz Pharmaceuticals. These may include advisory board services, speaker services, medical writing, data analysis, development of educational materials or other consulting services. Fees and ToVs relating to expenses agreed in the written agreement covering the activity are disclosed as two separate amounts, under "Contracted Services – Fees" and "Contracted Services – Expenses".

ToVs to HCOs

- Donations and grants: funding, benefits in kind or services freely given for the purpose of supporting healthcare, scientific research or education, with no consequent obligation on the recipient organisation to provide goods or services to Jazz Pharmaceuticals in return. Donations and grants to individuals are prohibited. In general, donations are physical items, services or benefits-in-kind that may be offered or requested; grants are the provision of funds.
- Congress and educational event sponsorship: expenses related to the sponsorship of HCOs as congress organisers and/or secretariats, and third parties acting on behalf of HCOs, in exchange for corporate benefits at an event (e.g., booth space, hosting of a symposium, stands, advertising on programmes or banners), and room hire or catering if paid on behalf of an HCO.

- Fees: ToVs that are fees for service resulting from or related to contracts between Jazz Pharmaceuticals and institutions, organisations or associations of HCPs under which such bodies provide services to Jazz Pharmaceuticals, or any other type of funding not covered in the previous categories. Fees and ToVs relating to expenses agreed in the written agreement are disclosed as two separate amounts, under "Contracted Services – Fees" and "Contracted Services – Expenses".

Research and Development

HCP or HCO Transfers of Value that relate to the planning and conduct of:

- Non-clinical studies (as defined in the OECD Principles on Good Laboratory Practice);
- Clinical trials (as defined in Regulation (EU) 536/2014);
- Non-interventional studies that are prospective in nature and that involve the collection of patient data from or on behalf of individual or groups of HCPs specifically for the study. This also includes Investigator Sponsored Research (ISRs);
- Activities performed by Clinical Research Organisations (CROs) on behalf of Jazz Pharmaceuticals.

Retrospective non-interventional studies are not classified as R&D and are disclosed at individual level under Fees for Service, consistent with Jazz Pharmaceuticals' global approach.

2. Disclosure's Scope

2.1 Products concerned

Jazz Pharmaceuticals discloses direct and indirect ToVs, whether in cash, in kind or otherwise, made for promotional purposes or otherwise, in connection with the development and sale of prescription-only medicines for human use. Transfers connected exclusively to over-the-counter products, medical devices (where not associated with a prescription medicine), or non-medicinal products are excluded unless disclosure is required under applicable law or the IML Code of Ethics.

2.2 Company concerned

This disclosure covers Transfers of Value made by Jazz Pharmaceuticals' operations in Luxembourg and by other Jazz Pharmaceuticals affiliates to recipients whose principal professional address, place of incorporation or primary place of operation is in Luxembourg. Where Jazz Pharmaceuticals participates in co-promotion arrangements, only Transfers of Value made directly by Jazz Pharmaceuticals are included (see Section 3.4).

2.3 Excluded ToVs

In accordance with the EFPIA Disclosure Code and the IML Code of Ethics, Jazz Pharmaceuticals excludes the following from disclosure:

- Ordinary course purchases and sales of medicines by and between Jazz Pharmaceuticals and an HCP or HCO;
- Samples of medicines provided in accordance with regulatory requirements;
- The cost of food and beverages (e.g., meals provided at professional gatherings), in line with Jazz Pharmaceuticals' established methodology and the IML Code of Ethics;
- Informational and educational materials of negligible value;
- Costs associated with meetings organised solely by Jazz Pharmaceuticals, with the exception of fees paid to individual HCPs providing services (such as speaker fees), which are disclosed in the appropriate Contracted Services category;
- Salary and benefits of HCPs employed directly and exclusively by Jazz Pharmaceuticals;
- Donations to charitable organisations that do not meet the definition of an HCO;
- Transfers of Value to Patient Organisations (reported separately on Jazz Pharmaceuticals' corporate website).

Where a cost forms an inseparable part of a reportable Transfer of Value (for example, hospitality embedded within a sponsorship package), it is included.

2.4 ToVs date

Jazz Pharmaceuticals discloses all Transfers of Value made between 1 January and 31 December of one calendar year by 30 June 2026, or such earlier date as may be specified by Innovative Medicines for Luxembourg ("IML").

A Transfer of Value is made when the transfer is complete (e.g., on payment date or transfer of value date). For example, if a contract is signed on 1 October 2024 but the payment is made on 1 January 2025, the ToV is included in the 2025 disclosure published in 2026.

Jazz Pharmaceuticals applies a consistent recognition approach:

- Direct monetary payments (e.g., consultancy fees, sponsorship payments, grants): the payment date is used;
- In-kind Transfers of Value (e.g., travel, accommodation, registration fees): the event start date is used;
- Research and Development payments: the payment date is used.

Consistent with Jazz Pharmaceuticals' established methodology, there is an unavoidable delay between the date a payment is approved within the company and the date the payment is executed. Jazz Pharmaceuticals discloses payment details based on the date the payment was made, not the date the underlying activity was performed.

2.5 Direct ToVs

Direct Transfers of Value are those made directly by Jazz Pharmaceuticals for the benefit of a Recipient. These include Fees for Service and Consultancy paid directly to HCPs or

HCOs, Sponsorship payments to HCOs, Donations and Grants, and other contributions paid directly to the Recipient. The recipient recorded is the natural or legal person receiving the payment, subject to the treatment described in Section 3.2.

2.6 Indirect ToVs

Indirect Transfers of Value are those made on behalf of Jazz Pharmaceuticals for the benefit of a Recipient, or those made through an intermediary, where Jazz Pharmaceuticals knows or can identify the HCP or HCO that will benefit from the ToV.

Examples include travel and accommodation arranged through a travel management provider; registration fees paid via congress organisers; consultancy fees processed through agencies where the individual HCP is identifiable; and event sponsorship payments made to a Professional Conference Organiser (PCO) acting on behalf of an identifiable HCO.

Where Jazz Pharmaceuticals makes a Transfer of Value to an individual HCP indirectly via an HCO, the transfer is disclosed only once and, where possible, against the HCP. Where services for Jazz Pharmaceuticals are rendered by an HCP on behalf of an HCO, the associated fees and expenses paid by Jazz Pharmaceuticals to the HCO are disclosed as Transfers of Value made to the HCO, unless Jazz Pharmaceuticals can confirm that the HCP received the benefit (e.g., fees paid to the HCP and/or reimbursement of related expenses), in which case the ToVs are disclosed as transfers to the HCP.

Where services are provided by a third-party provider on behalf of several HCPs or HCOs and the recipients cannot be individually identified, Jazz Pharmaceuticals discloses against the third-party provider.

Third-party agencies and PR firms subcontracting to HCPs

Jazz Pharmaceuticals regularly contracts with advertising agencies, PR agencies and similar providers for services related to its business. Where work commissioned by Jazz Pharmaceuticals is subcontracted by the agency to an individual HCP, the agency is required to report this to Jazz Pharmaceuticals. Jazz Pharmaceuticals will disclose any payment made to the HCP by that third party as though the payment had been made directly by Jazz Pharmaceuticals to the HCP.

Medical education grants to independent companies

Where Jazz Pharmaceuticals is approached by an independent company to provide funding in connection with medical education projects, the rules governing such funding require that Jazz Pharmaceuticals has no influence over the details of the project. Jazz Pharmaceuticals will not know whether, or which, HCPs are involved in such projects. Consistent with Jazz Pharmaceuticals' established methodology, Transfers of Value relating to this type of project are disclosed as payments to the recipient organisation (HCO).

Grants to HCOs for HCP meeting attendance

Where Jazz Pharmaceuticals is asked by an HCO to provide financial support to assist its employees to attend medical meetings, disclosure is made as follows:

- Where the payment is associated with named individuals, the disclosure is made as if the money were transferred directly to the named HCP(s);
- Where Jazz Pharmaceuticals is not aware of the names of the HCPs receiving the support, the financial support is disclosed against the named HCO.

2.7 Non-monetary ToVs

Non-monetary Transfers of Value are subject to the same transparency principles as monetary payments. Examples include:

- Services provided to a recipient via a third party;
- Collaborative Working in the form of non-financial support such as editorial support for a publication, agency support or other types of non-financial support;
- Services provided by Jazz Pharmaceuticals personnel;
- Educational or scientific support delivered in kind;
- Grants or donations provided in the form of goods, equipment or software.

Where goods or services are purchased from a third party, Jazz Pharmaceuticals discloses the invoiced cost. Where internal personnel provide services, value is calculated using a documented fair market value methodology reflecting the nature and duration of the support provided. Non-monetary Transfers of Value are disclosed within the appropriate EFPIA reporting category based on the nature of the activity.

2.8 ToVs in case of partial attendance or cancellation and refunds

In respect of each Transfer of Value described above, Jazz Pharmaceuticals discloses details only if an HCP or HCO receives the benefit of the transfer. For example, Jazz Pharmaceuticals will not disclose a transfer relating to a flight intended to be taken by an HCP in relation to a fee for service contract if the HCP does not in fact take the flight, even if a cost is incurred by Jazz Pharmaceuticals. Conversely, Jazz Pharmaceuticals will disclose a Transfer of Value if the HCP incurred the cost of the flight they were going to take and was directly reimbursed by Jazz Pharmaceuticals.

In cases of partial attendance, only the benefit actually received is reported. Contractual cancellation fees paid directly to an HCP or HCO are disclosed. Jazz Pharmaceuticals offsets refunds against the original Transfers of Value for the relevant HCP or HCO, so that disclosure reflects the net value transferred.

Where costs are not individually itemised (for example, the cost of a coach transferring a group of HCPs from an airport to a conference venue), the total cost is split equally between all those receiving the benefit.

2.9 Cross-border activities

Jazz Pharmaceuticals discloses cross-border Transfers of Value based on the HCP or HCO's principal place of practice, in line with the EFPIA Disclosure Code and the IML Code of Ethics. If the HCP or HCO operates in more than one country, Jazz Pharmaceuticals will

select one country to be the principal place of practice and disclose Transfers of Value in that country.

Transfers of Value made by Jazz Pharmaceuticals to Luxembourg HCPs or HCOs are included in the Luxembourg disclosure report irrespective of where the Jazz Pharmaceuticals entity making the transfer is located (e.g., Transfers of Value made by Jazz Pharmaceuticals entities outside Luxembourg are included). Jazz Pharmaceuticals maintains coordinated global processes to capture cross-border payments and ensure consistent country allocation.

2.10 R&D

Jazz Pharmaceuticals discloses Transfers of Value to HCPs and HCOs that relate to research and development in the aggregate figure, in accordance with the EFPIA Disclosure Code and the IML Code of Ethics. See Section 1.2 for the types of activities included in the disclosure under R&D.

Where a study is retrospective in nature and does not meet the EFPIA definition of R&D, related Transfers of Value are disclosed at individual level under Fees for Service. Jazz Pharmaceuticals applies documented internal classification and review processes to ensure consistent categorisation of R&D activities and alignment with Code definitions.

2.11 Voluntary disclosure

Jazz Pharmaceuticals complies fully with all mandatory disclosure obligations under the EFPIA Disclosure Code and the IML Code of Ethics. Jazz Pharmaceuticals does not disclose additional voluntary categories of Transfers of Value beyond those required under applicable industry standards in Luxembourg for the 2025 reporting year.

3. Specific Considerations

3.1 Country unique identifier

Jazz Pharmaceuticals uses a structured recipient identification process to ensure Transfers of Value are attributed to the correct HCP or HCO. Unique internal identifiers are applied to recipients to prevent duplication and ensure accurate aggregation of payments. Where available, Jazz Pharmaceuticals uses recognised commercial databases (e.g., Jazz Pharmaceuticals' Master Data Management provider or equivalent systems) to validate recipient details, including name, address and principal professional location.

Jazz Pharmaceuticals applies internal validation checks to confirm recipient classification and avoid misattribution or duplicate reporting across reporting cycles.

3.2 Self-incorporated HCP

Consistent with Jazz Pharmaceuticals' established methodology for Luxembourg, where a Healthcare Organisation (HCO) consists of only one healthcare professional or other relevant decision maker, it is treated for disclosure purposes as an individual HCP.

Where an HCP operates a private company, partnership, charity or similar vehicle for the purpose of receiving their professional income, any payment made by Jazz Pharmaceuticals to that organisation is regarded for disclosure purposes as a direct payment to the HCP. Similarly, where the majority of employees or contracted suppliers of an organisation are HCPs, the full value of any payment made to such organisation in connection with the services of a named or identifiable individual is regarded as a direct payment to that HCP.

Where an HCO insists that services provided by its HCP employees cannot be contracted with the individual HCP and must be contracted through the HCO, the following applies:

- Where Jazz Pharmaceuticals contracts for the services of a named HCP, the fee received by the HCP is disclosed under the HCP; any administration fee charged by the HCO is disclosed as a fee for service to the HCO;
- Where the HCP does not receive any additional payment for the service performed (for example, where the service is performed during the HCP's ordinary working hours at the HCO, such as speaking at a meeting), the full amount paid by Jazz Pharmaceuticals is disclosed under the HCO as a fee for service.

3.3 Multi-year agreements

Where Jazz Pharmaceuticals enters into agreements that extend across more than one calendar year, only Transfers of Value paid or provided during the 2025 reporting period are disclosed in the 2025 report. Disclosure is based on the date of payment (for monetary transfers) or the date the benefit was received (for in-kind transfers), regardless of when the contract was originally executed. A project spanning two calendar years and involving multiple individual Transfers of Value during that period will therefore have two associated disclosures, one for each calendar year, showing the value of the transfer made in that specific calendar year. This approach ensures accurate period alignment and prevents front-loading or deferral of disclosure.

3.4 Country specificities

Jazz Pharmaceuticals applies the following Luxembourg-specific considerations:

Local Code reference

Disclosure obligations are interpreted and applied in accordance with the Innovative Medicines for Luxembourg ("IML") Code of Ethics, as administered by Innovative Medicines for Luxembourg ("IML"). Where the IML Code of Ethics imposes a specific local requirement that differs from or supplements the EFPIA Disclosure Code, the local requirement is followed.

Contributions to meetings and gatherings

Jazz Pharmaceuticals discloses all payments made to medical associations, HCOs and similar bodies in connection with meetings. This includes direct funding (such as sponsorship fees or fees for exhibition space) and indirect support (such as the provision of a logistics agency or subsidising the cost of registration fees). The details are recorded in the relevant cost category. Sponsorship costs related directly to food are outside the scope of

disclosure. Costs associated with meetings organised solely by Jazz Pharmaceuticals are outside the scope of disclosure, with the exception of fees paid to individual HCPs providing services such as speaker engagements.

Sponsorship of HCP attendance at meetings

The IML Code of Ethics permits pharmaceutical companies to support HCP attendance at educational meetings. Jazz Pharmaceuticals discloses associated Transfers of Value against the individual attendee. Costs disclosed include transport, registration fees and accommodation. Costs related to subsistence (food and beverages) are not disclosed but are regulated by strict industry guidelines under the IML Code of Ethics.

Co-promotion arrangements

Where Jazz Pharmaceuticals is party to a co-promotion arrangement, Jazz Pharmaceuticals discloses only Transfers of Value made directly by Jazz Pharmaceuticals from its own bank accounts and recorded in its accounting records as part of its normal course of business, except where the other contracting party is an HCP or HCO, in which case Jazz Pharmaceuticals is responsible for disclosing all Transfers of Value made by Jazz Pharmaceuticals in connection with the agreement. Transfers of Value made by co-promotion partners are disclosed separately by those organisations.

Shareholders and affiliates

As an independent publicly listed company, Jazz Pharmaceuticals discloses all payments made directly from its own bank accounts and recorded in its accounting records as part of its normal course of business. Jazz Pharmaceuticals does not disclose payments made by its shareholders or other stakeholders, whether individuals or organisations.

Charity payments in lieu of fees

Occasionally, an HCP who has provided a service to Jazz Pharmaceuticals may request that their fee be paid to a charity. Jazz Pharmaceuticals does not ordinarily permit this and payments are normally made directly to the HCP. In the exceptional cases where a payment to a charity has been approved, the disclosure is nonetheless made against the individual HCP who provided the service.

Patient Organisations linked to an HCP

All Transfers of Value to Patient Organisations are disclosed directly on Jazz Pharmaceuticals' corporate website. Where funding is linked to an individual HCP working with a Patient Organisation, the funding is disclosed twice: the portion relating to the individual HCP is disclosed on the local disclosure platform under that HCP, and the overall project is disclosed on Jazz Pharmaceuticals' corporate website under the Patient Organisation entry.

Sponsorship involving multiple HCOs

Where sponsorship arrangements involve multiple HCO beneficiaries and allocation is not contractually specified, Jazz Pharmaceuticals applies a reasonable and consistent allocation methodology.

3.5 Quality checks

Jazz Pharmaceuticals applies a structured quality assurance process designed to ensure completeness, accuracy and compliance with the EFPIA Disclosure Code and the IML Code of Ethics. Controls operate across four key stages: data collection, data management, report generation and remediation.

Data collection

Transfers of Value are captured through validated financial and contracting systems. Controls include mandatory transparency coding at the point of contracting and payment; defined data fields for recipient classification and activity type; reconciliation between finance, procurement and event management systems; and controls to distinguish direct and indirect Transfers of Value. Cross-border payments are subject to affiliate coordination and validation prior to inclusion in the country dataset.

Data management and validation

Jazz Pharmaceuticals performs structured data validation prior to report generation, including recipient identity verification and classification checks; duplicate detection and resolution; review of self-incorporated HCP status; R&D vs. non-R&D classification validation; and aggregation logic verification. Jazz Pharmaceuticals also permits relevant business partners and stakeholders to review data relating to recipients with whom they have engaged. In addition, where appropriate, HCPs involved in non-R&D activities may be provided with a statement of disclosable spend for review and validation prior to submission to Innovative Medicines for Luxembourg ("IML").

Report generation

Prior to submission, data extracts are reconciled against underlying financial records; category totals are reviewed for material variance; senior compliance personnel conduct final review; and approval workflows are documented.

Remediation and post-publication governance

Jazz Pharmaceuticals maintains documented procedures for managing queries, corrections and disputes. Where inaccuracies are identified, data is reviewed and validated against source systems, corrections are applied where appropriate, and updated reports are submitted in accordance with Innovative Medicines for Luxembourg ("IML") processes. Jazz Pharmaceuticals retains disclosure records in line with Innovative Medicines for Luxembourg ("IML") and EFPIA requirements and conducts periodic internal reviews.

4. Data protection legal basis

4.1 Consent collection

Jazz Pharmaceuticals relies on explicit consent as the lawful basis for individual-level disclosure of Transfers of Value to HCPs and HCOs in Luxembourg. Consistent with Jazz Pharmaceuticals' established methodology, consent is sought from both HCPs and HCOs prior to disclosure of personal data at named level.

Jazz Pharmaceuticals processes personal data in accordance with:

- The EU General Data Protection Regulation (Regulation (EU) 2016/679, "GDPR");
- the Luxembourg Act of 1 August 2018 on the protection of natural persons with regard to the processing of personal data;
- Where applicable, the UK General Data Protection Regulation and Data Protection Act 2018, including in circumstances involving cross-border engagements or data processed by Jazz Pharmaceuticals affiliates outside the European Economic Area.

Prior to disclosure, Jazz Pharmaceuticals seeks informed and specific consent from HCPs and HCOs to publish Transfers of Value at named level. Transparency provisions are included within written engagement agreements and supported by Jazz Pharmaceuticals' Privacy Notice, which explains:

- The categories of data to be disclosed;
- The purpose and legal basis of disclosure;
- The public platforms on which disclosure will occur;
- The duration of publication;
- The recipient's data protection rights, including the right to withdraw consent.

Where individual-level disclosure is not legally possible

In certain circumstances, individual-level disclosure of HCPs and HCOs Transfers of Value may not be legally possible. This may include situations where:

- Consent has not been provided;
- Consent has been withdrawn prior to publication;
- Local legal or regulatory restrictions prevent named disclosure;
- Conflicting legal obligations apply.

In such cases, the relevant Transfers of Value are disclosed in aggregate as a separate line entry within the relevant disclosure category, in accordance with the EFPIA Disclosure Code and the IML Code of Ethics.

Partial consent

Jazz Pharmaceuticals supports full transparency and therefore does not apply partial disclosure at transaction level. Where an individual recipient provides partial consent (for example, consenting to disclosure of some Transfers of Value but not others within the same reporting period), Jazz Pharmaceuticals applies a consistent approach: all Transfers of Value relating to that recipient for the relevant reporting year are disclosed in aggregate.

Withdrawal or change of consent

HCPs and HCOs may withdraw consent at any time prior to publication. Where consent is withdrawn before disclosure is submitted, the relevant Transfers of Value are included in aggregate. If consent is withdrawn after publication, Jazz Pharmaceuticals will remove the relevant personal information from its corporate website and other platforms as soon as

reasonably practicable from the date the decision is communicated to Jazz Pharmaceuticals, and the Transfers of Value will be reclassified as aggregate in any subsequent updates.

Where multiple or conflicting consent inputs are received, Jazz Pharmaceuticals relies on the most recent documented consent status at the time of publication. Jazz Pharmaceuticals maintains documented records of consent status and applies internal controls to ensure the appropriate disclosure category (individual or aggregate) is applied.

Cross-border considerations

Where Transfers of Value involve cross-border engagements with HCPs based in Luxembourg but contracted through other Jazz Pharmaceuticals affiliates within the EEA or elsewhere, Jazz Pharmaceuticals coordinates with relevant affiliates to ensure that consent status is appropriately recorded and applied to the Luxembourg disclosure.

Jazz Pharmaceuticals applies appropriate technical and organisational safeguards to protect personal data throughout collection, storage, validation and reporting processes.

Exercising data protection rights

Individual HCPs and HCO representatives have the right at any time to request access to, rectification or erasure of their personal data, or to withdraw their consent. These rights may be exercised by contacting Jazz Pharmaceuticals' Data Protection Officer by email at dpo@jazzpharma.com.

4.2 Legitimate interests

This subsection addresses the potential use of legitimate interests as a lawful basis under the GDPR.

Jazz Pharmaceuticals does not rely on legitimate interests as the legal basis for individual-level disclosure of Transfers of Value to HCPs and HCOs in Luxembourg. Individual-level disclosure occurs only where explicit consent has been obtained in accordance with Section 4.1. Where consent is not available, withdrawn, or otherwise not legally valid, Transfers of Value are disclosed in aggregate in accordance with the EFPIA Disclosure Code and the IML Code of Ethics.

Accordingly, no Legitimate Interests Assessment (LIA) is applied to individual-level transparency reporting for the 2025 reporting year in Luxembourg.

5. Form of disclosure

5.1 Date of publication

Jazz Pharmaceuticals publishes its annual disclosure of Transfers of Value no later than 30 June 2026, covering Transfers of Value made between 1 January 2025 and 31 December 2025, or by such earlier date as may be specified by Innovative Medicines for Luxembourg ("IML").

Where corrections are required following publication, updated data is submitted in accordance with Innovative Medicines for Luxembourg ("IML") processes.

5.2 Disclosure platform

Jazz Pharmaceuticals publishes its Luxembourg disclosure on the IML central transparency platform (<https://www.iml.lu/en/our-points-view/transparency>) and Jazz Pharmaceuticals' corporate website.

The platforms chosen fulfil the EFPIA Disclosure Code recommendation of a platform accessible in the country where the Recipient has their primary practice, and align with the requirements of the IML Code of Ethics.

5.3 Disclosure language

Jazz Pharmaceuticals publishes the Luxembourg disclosure report and this Methodological Note in English.

6. Disclosure financial data

6.1 Currency

Jazz Pharmaceuticals discloses Transfers of Value to Luxembourg HCPs and HCOs in Euro (EUR). All disclosed amounts, including category totals, are presented in EUR. Where Transfers of Value are made in a currency other than EUR (for example, where services are provided outside Luxembourg or where the underlying invoice is denominated in another currency), the amount is converted into EUR using the exchange rate applicable on the date of the conversion calculation, based on publicly available exchange rate sources including www.xe.com, consistent with Jazz Pharmaceuticals' established methodology. Where there have been significant currency fluctuations during the reporting period, this approach may result in greater variation in the converted amounts.

6.2 VAT included or excluded

Where possible, Jazz Pharmaceuticals discloses Transfers of Value as net amounts, excluding Value Added Tax (VAT) and any applicable withholding tax. Where VAT or other taxes cannot reasonably be separated from the total invoiced amount through Jazz Pharmaceuticals' financial systems, the gross amount is disclosed. This methodology is applied consistently across all disclosure categories.

6.3 Calculation rules

Transfers of Value are aggregated per recipient and per reporting category in accordance with the EFPIA disclosure template and the IML Code of Ethics. Where individual-level disclosure applies, the total amount disclosed for each recipient represents the sum of all reportable Transfers of Value made during the reporting period.

Jazz Pharmaceuticals applies the following calculation principles:

- Only Transfers of Value made between 1 January 2025 and 31 December 2025 are included;
- For monetary payments, the date of payment determines inclusion in the reporting period;
- For in-kind Transfers of Value, the relevant event date is applied in accordance with Section 2.4;
- Research and Development Transfers of Value are disclosed as a single aggregate figure;
- Where payments are made in foreign currencies, conversion to EUR is performed in accordance with Section 6.1;
- Transfers of Value are reported as net amounts, excluding VAT and withholding tax where identifiable, in accordance with Section 6.2.

Where the service is provided to a recipient via a third party, Jazz Pharmaceuticals discloses the amount the third party invoices Jazz Pharmaceuticals for the service or goods as reflecting the value of the transfer. Where the service is provided by Jazz Pharmaceuticals personnel, Jazz Pharmaceuticals discloses the value of the transfer as the amount the recipient would have paid for an independent service provider to render the same service, taking into account the nature, duration and other relevant factors relating to the services provided.

Where a Transfer of Value relates to multiple identifiable recipients and allocation is not contractually specified, Jazz Pharmaceuticals applies a reasonable and consistent allocation methodology. Where costs are not individually itemised (for example, group transport from an airport to a conference venue), the total cost is split equally between all those receiving the benefit. Where adjustments, credit notes or reconciliations occur prior to publication, disclosure reflects the final net value transferred. Jazz Pharmaceuticals maintains supporting documentation and audit trails for all disclosed amounts and applies internal review controls prior to submission.

7. Additional information

Any questions relating to this Methodological Note or Jazz Pharmaceuticals' Luxembourg disclosure should be directed to Jazz Pharmaceuticals' Compliance team via the contact details published on Jazz Pharmaceuticals' corporate website. Data protection enquiries (including requests to exercise rights of access, rectification or erasure, or to withdraw consent) may be directed to Jazz Pharmaceuticals' Data Protection Officer at dpo@jazzpharma.com.