

## METHODOLOGICAL NOTE

### 1. Introduction

Jazz Pharmaceuticals (hereinafter, the “Company”) will publish all Transfers of Value made to healthcare professionals (HCPs) and healthcare organizations (HCOs) in accordance with the Code of Practice of Farmaindustria, the Spanish Pharmaceutical Industry Association (hereinafter, the “Code”). This document summarizes the approach adopted by the Company to calculate the published figures.

### 2. Definitions

#### 2.1. Recipients

##### 2.1.1. Healthcare Organizations (HCOs)

For the purposes of these disclosures in accordance with the Code, the Company has defined the term healthcare organizations as any legal body or entity (i) that is a medical or scientific organisation, healthcare institution (of any legal status or organisation), such as hospitals, clinics, foundations, universities and other academic entities, scientific societies (excluding Patient Organisations covered by article 17 of this Code), or (ii) through which one or more Healthcare Professionals provide services.

##### 2.1.2. Healthcare Professionals (HCPs)

For the purposes of these disclosures in accordance with the Code, the Company includes in this definition any member of the medical, dental, pharmaceutical, nursing or podiatric profession, any other person legally considered as such, or any other person who, in exercising their profession, may perform or participate directly or indirectly in the prescription, purchase, supply, dispensation or administration of medicinal products for human use.

##### 2.1.3. Transfer of value (ToV)

For the purposes of these disclosures in accordance with the Code, the Company has defined the term Transfer of Value as any direct or indirect payment or benefit in cash, in kind, or otherwise, regardless of its purpose.

## 2.2. Kind of ToV

The different categories of Transfers of Value referred to in this publication are as follows:

- Donations and Grants: Applicable only to healthcare organizations (HCOs). Donations and grants to HCOs that support healthcare, including donations and grants (in cash or in kind) to institutions, organizations, or associations formed by healthcare professionals (HCPs) and/or that provide healthcare services.
- Support for Scientific and Professional Meetings: Contributions to costs related to events, through HCOs or third parties, including sponsorship of HCP attendance at events, such as:
  - Sponsorship agreements with HCOs or with third parties designated by an HCO to manage an event
  - Registration fees
  - Travel and accommodation
- Provision of Services: Transfers of Value related to or made under contracts between laboratories and HCPs, resulting in the provision of a service or a Transfer of Value not covered by the aforementioned categories. Transfers of Value will be published separately as fees on one hand, and as agreed expenses for the provision of these services on the other.
- Research and Development (R&D): Transfers of Value to HCOs or HCPs for conducting clinical trials, observational studies, or non-clinical studies. All payments made for R&D are published in aggregate figures, in accordance with the provisions of the Code.
- Patient Organizations: All Transfers of Value to patient organizations are published directly on the Jazz Pharmaceuticals Company website. If the payment is associated with an individual HCP working with the patient organization, the funding will be split into two parts: on one hand, the HCP payment will be published on the local disclosure platform under the HCP's entry, and on the other, the overall project will be published on the Company's website under the patient organization's entry, excluding the HCP-related fees, in accordance with the principle of non-duplication.

## 3. Disclosure's scope

### 3.1. Products concerned

All Transfers of Value referred to in this report relate to activities involving prescription medicines.

### 3.2. Company concerned

All Transfers of Value referred to in this report relate to activities carried out by Jazz Pharmaceuticals Iberia, a subsidiary of Jazz Pharmaceuticals Inc.

### **3.3. Excluded Transfers of value**

Transfers of Value that are part of commercial transactions between laboratories and distributors, pharmacies, and healthcare organizations are excluded from this definition.

Likewise, the cost of sponsorships directly related to any form of hospitality associated with meals and/or lunches (food) falls outside the scope of disclosure, although it is governed by strict industry guidelines and the Code itself.

### **3.4. Transfers of value Date**

There is an unavoidable delay between the date on which the payment is approved within the Company and the date on which it is made. The Company will disclose the payment details based on the date the payment was made, not the date on which the activity took place.

### **3.5. Direct and indirect Transfers of value**

The Transfers of Value referred to in this publication may be:

- Direct: when the laboratory makes the transfer directly for the benefit of a Recipient.
- Indirect: when a third party (such as suppliers, agents, partners, or affiliates, including foundations), acting on behalf of the Company, makes the transfer for the benefit of a Recipient and the Company identifies or can identify the Recipient.

### **3.6. Non-monetary Transfers of value (in-kind)**

The Company does not make any kind of non-monetary (in-kind) Transfers of Value.

### **3.7. Transfers of value in case of partial attendance, cancellation and refund**

The Transfers of Value disclosed by the Company refer to effective Transfers of Value; that is, payments made by the Company that did not result in a benefit for the recipient such as in cases where an HCP was ultimately unable to attend an event or when such payments were reimbursed to the Company will not be disclosed.

However, payments made to organizations will be disclosed even if the event was ultimately cancelled, provided that no subsequent reimbursement was made.

### **3.8. Cross-Border Activities**

The Company is a global organization operating in many countries and, as such, may occasionally engage HCPs and HCOs from different countries. In these cases, disclosures will be made in the country where the recipient has their primary professional practice, by the Jazz affiliate located in or operating within that country, in accordance with local laws and regulations.

Payments made to local healthcare organizations and professionals by other Jazz entities based in different countries will be disclosed locally, regardless of the country of origin of the funding.

### **3.9. R&D**

Transfers of Value to HCOs or HCPs for the conduct of clinical trials, observational studies, or non-clinical studies are disclosed. All payments made for R&D purposes are published in aggregate figures, in accordance with the provisions of the Code.

## **4. Specific considerations**

### **4.1. Country unique identifier**

The identification of both HCPs (Healthcare Professionals) and HCOs (Healthcare Organizations)/organizations and Patient Organizations is done using the NIF (Tax Identification Number), which, in the case of HCPs, corresponds to the DNI (National Identity Document).

In accordance with the provisions of the Code, this information is published in a partially masked format (hiding 5 digits) to prevent misuse of the data

### **4.2. Self-incorporated HCP**

Healthcare professionals who provide full-time and exclusive services to the Company during the period covered by the published Transfers of Value are excluded from this publication.

### **4.3. Multi-year agreements**

When projects span multiple years, the relevant amount paid will be reported for the year in which each part of the payment was made. Thus, a two-calendar-year project involving several individual Transfers of Value during that time will have two associated disclosures: one for each calendar year, showing the value of the transfer made in that specific year.

#### 4.4. Country specificities

The Company adheres to the Code of Practice of Farmaindustria, the Spanish Pharmaceutical Industry Association. The publication of Transfers of Value has been carried out in accordance with the provisions of the Code for this purpose.

#### 4.5. Quality Checks

The Company uses a combination of automated systems and manual data entry to collect the necessary information on Transfers of Value and their subsequent publication. The Company conducts regular checks on this data to verify its reliability and accuracy to the extent possible.

### 5. Data protection legal basis

The Company complies with both the General Data Protection Regulation (GDPR) and the Organic Law on Data Protection and Guarantee of Digital Rights (LOPDGDD), which adapts Spanish legislation to the GDPR.

#### 5.1. HCPs

In accordance with the provisions of the Code and current data protection regulations, the Company has a legitimate interest in publishing, on an individual basis, all Transfers of Value made directly or indirectly to HCPs operating in Spain. Therefore, it does not require prior consent from them for the collection, processing, and publication of their personal data (including data on Transfers of Value) necessary for such publication. Regarding the collection and processing of HCPs' personal data, the Company will comply with all requirements set forth in current data protection regulations, including informing HCPs of the publication of their personal data as established in the Code.

HCPs may exercise their rights of access, rectification, cancellation, and opposition regarding their personal data at any time by contacting the Company's Data Protection Officer at: [dpo@jazzpharma.com](mailto:dpo@jazzpharma.com).

#### 5.2. HCOs

Transfers of Value made by the Company to Spanish HCOs will always be published on an individual basis.

## 6. Form of Disclosure

### 6.1. Date of publication

The Company adheres to the Code of Practice of Farmaindustria, the Spanish Pharmaceutical Industry Association. The publication date for Transfers of Value in 2025 is: June 27<sup>th</sup>.

### 6.2. Disclosure platform

All Transfers of Value are published directly on the Company's website:

<https://www.jazzpharma.com/our-purpose/transfers-of-value>

### 6.3. Disclosure language

The Company publishes Transfers of Value in both Spanish and English.

## 7. Disclosure financial data

### 7.1. Currency

All disclosures are made in the local currency (euro/€), including category totals. When payments are made in a currency other than the euro, the exchange rate used will be the exact euro equivalent on the date of conversion. Totals in euros will be calculated using the exchange rate in effect on the payment date (<http://www.xe.com/>). Variations may be greater if there have been significant exchange rate fluctuations during the reporting period.

### 7.2. VAT included or exclude

The Company publishes Transfers of Value based on the actual amount received by the recipient as follows:

- VAT is included for expenses such as travel, accommodation, and congress registration fees.
- VAT is excluded for fees and/or Transfers of Value for services rendered.

## 8. Additional information

### 8.1. Charitable Payments by HCPs

Occasionally, an HCP who has provided services to the Company may request that their fee be donated to charity. The Company does not allow these cases, and all payments are made directly to the HCP, who may then personally donate these fees if they wish.

## **8.2. Payments to HCO for Services Provided by an HCP Individually**

In certain cases, an HCO may request that any service provided by its employed HCPs cannot be contracted directly with them, but must be contracted through the HCO.

If the Company contracts the services of a specific HCP, the fees received by the HCP will be published in the entry corresponding to that HCP. Any "administrative expenses" charged by the HCO will be published as a fee for the service to that organization.

If the HCP does not receive specific fees for the service as it is considered part of their daily professional activity (e.g., because they act as a speaker at a meeting during their normal working hours), the full amount paid by the Company will be published as service fees to the HCO.

## **8.3. Private Companies**

The Company regularly contracts advertising and PR agencies, etc. (third-party organizations) to provide services related to its business. Occasionally, these services may be outsourced and subcontracted to an HCP individually.

The Company's policy is that all such services must be reported to the Company by the contracted service agency. The Company will publish any payment made to the HCP individually by the service agency as if the payment had been made directly by the Company to that HCP.

## **8.4. Payments to Third-Party Organizations for Services Provided by an HCP Individually**

The Company regularly contracts advertising and PR agencies, etc. (third-party organizations) to provide services related to its business. Occasionally, these services may be outsourced and subcontracted to an HCP individually. The Company's policy is that all such services must be reported to the Company by the contracted service agency. The Company will publish any payment made to the HCP individually by the service agency as if the payment had been made directly by the Company to that HCP.

## **8.5. Educational Grants to Independent Companies**

Occasionally, the Company may provide independent companies with funding related to medical educational projects. The rules related to Company funding in these circumstances require that the Company has no influence over the project details. The Company will not know if HCPs have been involved in such projects, or which HCPs have been involved if any. Thus, the Company publishes Transfers of Value related to such projects as payments to HCOs.

## **8.6. Contributions to Meetings**

The Company will publish all payments made to medical associations, HCOs, etc., related to meetings. This includes direct funding, such as sponsorship fees or the right to have an exhibition stand, and indirect support, such as providing a logistics agency or covering registration fees. Details are provided in the relevant entry line.

All costs associated with meetings organized solely by the Company are excluded from publication, except for possible Transfers of Value received by HCPs individually for their services as speakers and/or hospitality associated with such service (accommodation and transportation).

## **8.7. Individual support for HCP Attendance at Scientific Meetings**

The Company supports HCP attendance at scientific meetings. The Company will publish Transfers of Value associated with each attendee individually. When costs are common (e.g., the cost of a bus to transport a group of HCPs from the airport to the conference venue), the total cost will be divided equally among all beneficiaries and published individually.

The declared costs include transportation, registration fees, and accommodation.

## **8.8. Founding to HCOs to Support Their Attendance at Medical Meetings**

Occasionally, HCOs request financial support from the Company to help their employees attend medical meetings. When a payment associated with specific individuals has been made, the publication will be made as if the money had been transferred directly to each specific HCP. If the final recipients of these Transfers of Value are not known, the full payment will be attributed to the HCO.

## **8.9. Company Partners**

As an independent company, the Company publishes all payments made directly from the Company's bank accounts and listed in its records as part of its normal business operations. No payments are made to HCPs, HCOs, or third-party organizations from any bank account other than those of the Company.

The Company does not publish payments made by its shareholders or other stakeholders, whether individuals or organizations.

## **8.10. Joint Marketing Projects**

When the Company jointly markets a product with another pharmaceutical company, the Company will only declare payments made directly from the Company's bank accounts and listed in its records



as part of its normal business operations. Transfers of Value made by its joint marketing partners will be published separately by those organizations.

## Legal Notice

The Company uses a combination of automated systems and manual data entry to collect the necessary information on Transfers of Value and their subsequent publication. The published information reflects our good faith and best efforts to comply with the provisions of the Code. In the event that, despite our best efforts to ensure a publication that faithfully reflects the Transfers of Value carried out, correct and complete information could not be included, it will be investigated and corrected if the information is incorrect.

The Transfers of Value declared in accordance with the Code requirements published here will be used solely to comply with the provisions of the Code.

The data is not suitable for use as a tax reference or for other purposes, as the concepts used are specific to the sectoral transparency objective.

It is expressly warned that the publication of this information by the Company does not constitute a general authorization for those who access the information to carry out additional processing of the professionals' data.