



EFPIA HCP/HCO DISCLOSURE – METHODOLOGICAL NOTE FOR PUBLIC

COUNTRY: Romania

Date: 12.06.2026

	Teva Approach
BACKGROUND	<ul style="list-style-type: none"> Teva Pharmaceuticals SRL as committed organization in the Healthcare Sector is publishing a Transfers of Value („ToVs“) report in order to meet transparency obligation and to demonstrate the Company’s values.
APPLICABLE CODE	<ul style="list-style-type: none"> The ToVs report is made in accordance with the ARPIM Code of Ethics, which represents the EFPIA-member association for innovative pharmaceutical companies in Romania. Although Teva Romania is a member of APMGR, Teva Pharmaceutical Europe BV, as an EFPIA corporate member at European level, follows the reporting standards of the national innovative association (ARPIM).
DEFINITIONS	
Recipients	<ul style="list-style-type: none"> Healthcare Professionals („HCPs“) The following definition of Healthcare Professionals is provided by Article 35 of the Norms for the evaluation and approval of advertising for medicinal products for human use approved by the Order of the Ministry of Health no. 194/2015 (“Advertising Norms”): „Healthcare professionals are understood as “doctors, dentists, pharmacists, and nurses or pharmacy assistants”. The following definition of Healthcare Professionals is provided by the ARPIM Code of Ethics. „Any natural person that is a member of the medical, dental, pharmacy or nursing professions or any other person who, in the course of his/her 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 Romania. The definition of HCPs includes: (i) any official or employee of a government, agency or other organization (whether in the public or private sector) that may prescribe, purchase, supply, recommend or administer Medicinal Products and (ii) any employee of a Member Company whose primary occupation is that of a practicing HCP, but excludes (x) all other employees of a Member Company and (y) a wholesaler or distributor of Medicinal Products.“ Healthcare Organizations („HCOs“) The following definition of healthcare organizations is provided by Article 35 of the Advertising Norms: “Organization with activities in the field of health - any legal entity, with or without profit, that carries out activities related to human health, medical assistance or pharmaceuticals.” The following definition of Healthcare Organization is provided by the ARPIM Code of Ethics : „Any legal person/entity (i) that is a healthcare, medical or scientific association or organization (irrespective of the legal or organizational form), such as a hospital, clinic, foundation,

	<p>university or other teaching institution or learned society (except for POs), whose business address, place of incorporation or primary place of operation is in Romania or (ii) through which one or more HCPs provide services“.</p> <ul style="list-style-type: none"> • Professional Conference Organizers („PCOs“) The following definition of Professional Conference Organizers is provided by the ARPIM Code of Ethics : „A PCO is a company/individual specialised in the organization and management of congresses, conferences, seminars and similar events. Commercial companies involved in organization of travel (travel agencies) or accommodation (hotels, banqueting functions in hotels, etc.) are not considered PCOs.“ • Patient Organization („PO“) The following definition of Patient Organization is provided by the ARPIM Code of Ethics : „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“. • Retired HCPs are included if ToVs occurred during their active status. • Deceased HCPs are excluded.
<p>Kind of ToVs</p>	<ul style="list-style-type: none"> • Transfers of Value to Healthcare Professionals Under Romanian transparency legislation (Law no. 95/2006, Order no. 194/2015 and the Advertising Norms), the obligation was established to declare to the National Agency for Medicines and Medical Devices in Romania (ANMDDMR) and publish certain data in relation to all sponsorship activities, as well as any other expenses incurred in the year prior to reporting, for health professionals, professional organizations, patient organizations and any other type of organizations carrying out activities related to human health, medical or pharmaceutical assistance incurred in the year prior to reporting. Art. 814 of Law no. 95/2006 specifies that this obligation must be fulfilled under the conditions established by order of the Minister of Health. Annex no. 1 of Order no. 194/2015 provides in this regard that, the information to be declared and published, includes the following: <ul style="list-style-type: none"> ✓ the name and surname of the healthcare professional/healthcare organization; ✓ the specialty of the health professional; ✓ the address where he/she carries out his/her main activity; ✓ details related to sponsorships; ✓ other types of expenses such as fees for services, namely: conference, consultancy: for example, but not limited to: advisory services, expert opinion, medical writing and training for company employees, assignment of topics; ✓ expenses associated with the performance of the services provided for in the service contracts (transport and accommodation)

	<ul style="list-style-type: none"> ✓ when they were provided, paid or reimbursed to the Healthcare Professionals or for their benefit, directly or indirectly. <p>Transfers of Value disclosed by Teva Pharmaceuticals SRL consist in:</p> <ul style="list-style-type: none"> ✓ Registration fees, ✓ Travel and/or accommodation expenses, ✓ Sponsorship contracts, ✓ Fees for services, ✓ Expenses agreed in the services or consultancy contracts. <p>These represent expenses provided to or reimbursed to Healthcare Professionals or for their benefit, either directly or indirectly.</p> <ul style="list-style-type: none"> • Transfers of Value to Healthcare Organizations Under Romanian transparency legislation (Law no. 95/2006, Order no. 194/2015 and the Advertising Norms), the obligation was established to declare to the ANMDMR and publish certain data in relation to all sponsorship activities, as well as any other expenses incurred in the year prior to reporting, for professional organizations and any other type of organizations carrying out activities relating to human health, healthcare or pharmaceuticals. Art. 814 of Law no. 95/2006 specifies that this obligation must be fulfilled under the conditions established by order of the Minister of Health. Annex no. 1 of Order no. 194/2015 provides in this regard that, the information to be declared and published, includes the following: <ul style="list-style-type: none"> ✓ the name of the health organization; ✓ the address where they carry out their main activity; ✓ sponsorship details; ✓ other types of expenses such as fees for services, namely: conference, consultancy: for example, but not limited to: advisory board, expert opinion, medical writing and training for the company's employees, assignment of copyrights; ✓ expenses associated with the performance of the services provided for in the service contracts (transport and accommodation). <p>Transfers of value disclosed by Teva Pharmaceuticals SRL consist in:</p> <ul style="list-style-type: none"> ✓ Donations and grants, ✓ Sponsorship agreements, ✓ Travel and accommodation expenses, ✓ Fees for services, ✓ Expenses agreed in the services or consultancy contracts. <p>When they were provided, paid or reimbursed to Healthcare Organizations or for their benefit, either directly or indirectly.</p> <ul style="list-style-type: none"> • Transfers of Value related to Professional Conference Organizers (PCO) All Transfers of Value (ToVs) that pass through a Professional Congress Organizer (PCO) are considered indirect ToVs.
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	<p>Teva applies the following methodology for reporting ToVs made through PCOs:</p> <p>When Teva knows the name of the Healthcare Organization (HCO) that is the beneficiary</p> <p>The ToV is disclosed under the name of the PCO, and Teva must additionally include the name of the HCO in quotation marks. Format: PCO Name (“HCO Name”)</p> <p>When Teva cannot identify the Healthcare Organization</p> <p>The ToV is disclosed only under the name of the PCO, without listing any HCO. Format: PCO Name</p> <p>Events benefiting more than one HCO</p> <p>When a PCO organizes an event for more than one identifiable HCO, Teva will disclose the ToV under the name of the PCO, listing all HCOs in quotation marks.</p> <p>Disclosure of ToVs to individual HCPs through a PCO</p> <p>If:</p> <ul style="list-style-type: none"> ✓ the ToV is provided through a PCO, and ✓ Teva knows the identity of the HCP <p>Then the ToV is reported individually under the name of the HCP, as an indirect ToV.</p> <ul style="list-style-type: none"> • Research and Development („R&D“) - Transfers of Value to HCPs or HCOs related to the planning or conduct of (i) non-clinical studies (as defined in OECD Principles on Good Laboratory Practice); (ii) clinical trials (as defined in Regulation EU No. 536/2014); or (iii) 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. Teva shall disclose all R&D Transfers of Value for each Reporting Period on an aggregate basis.
<p>DISCLOSURE’S SCOPE</p>	
<p>Products concerned</p>	<ul style="list-style-type: none"> • Transactions included in the ToV report relate primarily to Prescription-only medicines. However, in limited cases, transfers of value associated with OTC products may also be included. This may occur, for example, when Teva engages the same healthcare professional to provide a service that covers both Prescription-only and OTC products, and the separation of the compensation by product category is not feasible or would not accurately reflect the nature of the service provided. • In such situations, Teva applies a conservative transparency approach and reports the full value of the transfer, in line with EFPIA’s principles on completeness, accuracy and patient-focused transparency. This approach ensures that all relevant interactions with healthcare professionals are disclosed appropriately, even

	when the activity spans across multiple product categories.
Company concerned	<ul style="list-style-type: none"> • Teva Pharmaceuticals SRL
Excluded ToVs	<ul style="list-style-type: none"> • The Transfers of Value corresponding to the following categories or provided in relation with the following activities, are not included in the disclosed information: <ul style="list-style-type: none"> ✓ Items of medical utility, ✓ Meals and drinks, when they are not part of a sponsorship contract, ✓ Medical samples, ✓ Commercial activities that are part of ordinary course purchases and sales of medicinal products, ✓ Or any Transfer of Value which is out of the reporting scope, as defined by the ARPIM Code of Ethics.
ToVs date	<ul style="list-style-type: none"> • Donations and grants: <ul style="list-style-type: none"> ✓ Monetary donation/grant: date of payment ✓ In-kind donation/grant: date of the in-kind donation/grant provision • Contributions to costs of events: <ul style="list-style-type: none"> ✓ Sponsorships agreements with HCOs/PCOs: date of payment ✓ Registration fees, travel, accommodation: start date of event • Fee for service and consultancy: <ul style="list-style-type: none"> ✓ Fees: date of payment ✓ Expenses agreed in the services or consultancy contracts: date of payment <p>ToV are reported for all activities that take place within the given calendar year, using either the first date of the event or the date of payment, depending on the ToV category. This includes all payments made during the reporting period, even if the underlying agreement or contract was concluded in the previous year.</p>
Direct ToVs	<ul style="list-style-type: none"> • Paid directly to Recipients by Teva.
Indirect ToVs	<ul style="list-style-type: none"> • Paid to Recipients via third party (e.g., travel agency or event organizer). • ToV provided to agency to support HCO's event - When a ToV is provided to an agency organizing an event for an HCO, and the HCO is known, the ToV is disclosed under the agency's name, with the HCO listed in quotation marks. If the HCO cannot be identified, the ToV is disclosed only under the agency's name. • ToV provided to HCO but ultimate recipients are HCPs - ToVs are reported under the HCO's name if the individual HCP beneficiaries cannot be identified. Where identification is possible, the ToVs are disclosed at the level of the respective HCPs.
Non-monetary ToVs	<ul style="list-style-type: none"> • Valued at actual cost to Teva.
ToVs in case of partial attendances or cancellation and refund	<ul style="list-style-type: none"> • In the case registration fee is paid and travel and/or accommodation is booked but HCP does not attend an event, no ToV is disclosed to that HCP. In the case of a partial attendance

	Teva is disclosing ToVs based on real HCP attendance.
Cross-border activities	<ul style="list-style-type: none"> For cross-border services, reporting follows the country where the service provider is licensed or practicing.
R&D	<ul style="list-style-type: none"> R&D transactions are disclosed in aggregate only.
Voluntary disclosure	<ul style="list-style-type: none"> Not applicable - our affiliate does not disclose any information beyond the National Code.
SPECIFIC CONSIDERATIONS	
Country unique identifier	<ul style="list-style-type: none"> Although the Unique Country Identifier (UCI) is not applicable in Romania according to the transparency legislation, Teva Pharmaceuticals SRL may use a UCI for internal purposes in exceptional cases where there is a risk of duplicate or ambiguous recipient names. This internal use aims solely to facilitate clear identification of recipients at national level and to avoid confusion when multiple recipients share the same name.
Self-incorporated HCP	<ul style="list-style-type: none"> For fees related to contracts concluded with healthcare professionals who are registered for tax purposes as group practices, associations, civil societies or SR-type companies, Teva reports the Transfer of Value under the name of the respective healthcare organization. To ensure clarity, the name of the individual healthcare professional who actually performed the service is indicated in quotation marks after the organization's name.
Multi-year agreements	<ul style="list-style-type: none"> ToVs are reported on the relevant date of payment, irrespective of the duration of the agreement.
Country specificities	<ul style="list-style-type: none"> Under Romanian transparency legislation (Law no. 95/2006, Order no. 194/2015 and the Advertising Norms), Teva Pharmaceuticals SRL follows exclusively the national transparency obligations established by Romanian law.
Quality Checks	<ul style="list-style-type: none"> A cross-check is performed between the ERP system and the Compliance approval system to ensure that all reported Transfers of Value are complete, accurate and consistent.
DATA PROTECTION LEGAL BASIS	
Consent	<ul style="list-style-type: none"> In Romania, Transfers of Value are disclosed in accordance with the mandatory requirements of Law no. 95/2006, Order no. 194/2015 and the Advertising Rules. As these legal provisions establish an obligation for manufacturers, distributors and marketing authorization holders to report all relevant Transfers of Value, the collection of individual consent from HCPs or HCOs is not required for disclosure purposes.
Legitimate interest	<ul style="list-style-type: none"> Teva Pharmaceuticals SRL does not rely on legitimate interest as a legal basis for individual disclosure of Transfers of Value to healthcare professionals. In Romania, disclosure obligations arise directly from the national legislation — including Law no. 95/2006, Order no. 194/2015 and the Advertising Rules — which require companies to report Transfers of Value irrespective of consent or legitimate-interest considerations.
FORM OF DISCLOSURE	
Date of publication	<ul style="list-style-type: none"> Each reporting period covers a full calendar year. ToVs are published on the Teva Pharmaceuticals SRL website by the end of June of the following year.



Disclosure platform	<ul style="list-style-type: none"> • Teva Pharmaceuticals SRL website.
Disclosure language	<ul style="list-style-type: none"> • The Romanian language is used for disclosure.
DISCLOSURE FINANCIAL DATA	
Currency	<ul style="list-style-type: none"> • For Romania, all Transfers of Value are disclosed in RON (Romanian Leu). If an expense is incurred in another currency, the amount is converted into RON using the exchange rate applied in Teva's financial system at the time of transaction processing.
VAT	<ul style="list-style-type: none"> • All Transfers of Value are reported including VAT and, where applicable, including any agency fees. For payments made under contracts with healthcare professionals registered as PFI/PFA, group practices, associations, medical civil societies, or SRL-type companies, the amounts reported are based on the invoiced values including VAT when applicable. • Sponsorship amounts and costs related to participation in events are also reported with VAT and agency fees included.
Calculation rules	<ul style="list-style-type: none"> • Meals and drinks are disclosed when they are included as part of a sponsorship agreement. • Shared travel of low individual value (such as bus or taxi transportation) may be allocated by dividing the total amount equally among the participants. • When a sponsorship payment is made to more than one HCO, it is assumed that each HCO receives an equal share of the amount, unless a different allocation is explicitly documented in the relevant contractual arrangements
ADDITIONAL INFORMATION	
Complaints or request for further information	<ul style="list-style-type: none"> • OfficeRO@teva-romania.ro
Media Contact	<ul style="list-style-type: none"> • OfficeRO@teva-romania.ro