

Guidelines by the FSA Board of Management pursuant to Section 4 of the FSA Transparency Code

Guidelines by the FSA Board of Management in accordance with Section 4 in conjunction with Section 8 Subsection 2 for ensuring that published data has been properly documented and accurately recorded

1. Pursuant to Section 8 para 2, the FSA Board of Management is required to make a model template available for ensuring that published data has been properly documented and accurately recorded, the wording of which is based on Schedule 2 EFPIA HCP/HCO Disclosure Code template.
2. In June 2014, the EFPIA will amend the Disclosure Code for the first time which makes the model template mandatory. Against this background, the FSA Board of Management hereby suggests that EFPIA member companies publish data on the basis of the model template attached hereto as **Annex 1**. The member companies are at liberty to specify the categories provided for in greater detail, as and when required.

Guidelines by the FSA Board of Management pursuant to Section 4 in conjunction with Section 11 para 2 on the possibility to use a common platform

The FSA will not avail itself of this option. The member companies shall make the requisite disclosures of monetary payments as per the Transparency Code.