

Disclosure of Transfers of Value Made in 2023

Methodological Statement

Alimera Sciences Europe Limited (the “Company”) specializes in the research, development and commercialization of prescription ophthalmic pharmaceuticals, and is dedicated to developing innovative, vision-improving treatments for diseases of the retina.

Our Company is committed to the development of therapies for eye conditions that will affect millions of people in our aging population, many of which lead to irreversible damage when left untreated.

Alimera Sciences Europe Limited is committed to work collaboratively with Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs), Healthcare Organisations (HCOs) and Patient Organisations (PO’s) for the benefit of patients. These interactions are essential for our research and development activities, including our clinical trial programme. Alimera Sciences Europe Limited makes payments to HCPs, ORDMs and HCOs directly and through clinical research organisation, agencies and third parties. These payments are made primarily in connection with research and development work, and we also reimburse, where appropriate, HCPs and ORDMs for attending meetings and conferences that contribute to their continued professional development.

Alimera Sciences Europe Limited policy mandates that our relationships with HCPs, ORDMs and HCOs be conducted with full transparency consistent with the requirements of the Code of Practice of the Irish Pharmaceutical Healthcare Association (IHPA Code) as described in this Methodological Statement. We gather and disclose all Transfers of Value (ToV) made to these HCPs, ORDMs, and HCOs as a matter of legitimate interest under applicable privacy law ToV disclosure reflects our commitment to ethical and transparent collaboration.

The legitimate interests of the Company permitting collection and disclosure of ToV information include the following:

- Decreasing any perception of influence on HCPs by the pharmaceutical industry;
- Promoting a culture of integrity of transactions between pharmaceutical companies and HCPs;
- Increasing public and patient confidence in the integrity and independence of HCPs (itself essential for generating confidence in those relationships and their proper functioning);
- Ensuring compliance by the pharmaceutical industry with legislative and Code restrictions in relation to advertising and promotion.
- Demonstrating transparency in relation to the industry’s relationships with HCPs;
- Showing accountability in these relationships and compliance by the industry and HCPs in relation to their legal obligations not to provide (on one hand) or accept (on the other hand) inducements to prescribe;
- Promoting confidence on the part of the public and on the part of stakeholders (e.g. regulators, managers of public health services, Government) in the legitimacy and bona fides of the engagements between the industry and HCPs; and

- Providing assistance in avoiding conflicts of interest.

Alimera Sciences Europe Limited will make Transfer or Value Disclosure for HCPs, ORDMs and HCOs on the IHPA Disclosure templates / Portal in line with the requirements of the IHPA Code 2021.

The listed individuals, healthcare organisations and patient organisations will be given the opportunity to check the entries against their name via an email sent to them by the IHPA database partner following submission of the draft data in the IHPA template by the company. Alimera Sciences Europe will respond to queries raised and submit updates as needed on resolution of the query.

Disclosure Methodology:

1. Disclosure of Transfer of Value (ToV) for Healthcare Professionals (HCPs) Other Relevant Decision Makers (ORDM)

- All HCPs and ORDMS are informed of the Company's disclosure practices during the first interaction involving a ToV.
- Alimera Sciences Europe Limited will collect the following types of personal data for each ToV disclosure:
 - Name
 - Principal practice address
 - Details of ToV, including value (in Euros) of the ToV and the nature and purpose(s) of the ToV
- Alimera Sciences Europe Limited as data controller may be reached as follow:
 - Philip Ashman PhD, President, International Operations
philip.ashman@alimerasciences.com

Alimera Sciences Europe Limited will maintain relevant records of disclosure for at least five (5) years from the data of disclosure.

- The IHPA will make ToV disclosure information provided to it publicly available for three (3) years at www.transferofvalue.ie, and the IHPA will be an independent data controller with respect to such data. The IHPA privacy notice is available at www.ipha.ie.
- Data subjects have the following rights with respect to their personal data related to ToV disclosures by the Company:
 - The right of access to personal data and information concerning the processing of data (as per Article 15 GDPR);
 - The right to rectification of data which is inaccurate or incomplete (Article 16 GDPR);
 - The right to erasure of personal data where there is no compelling reason for an organisation to keep using it (Article 17 GDPR);

- The right to restrict processing of personal data in certain circumstances, including where the accuracy of the data is contested, or the processing of the data is unlawful (Article 18 GDPR);
- The right to data portability (Article 19 GDPR); and
- The right to object to processing based on legitimate interests unless the controller can demonstrate overriding compelling legitimate grounds or data is necessary for a legal claim (Article 21 GDPR).

These rights can be exercised in respect of personal data for which either Alimera Sciences Europe Limited or the IPHA is the controller. Data subjects may obtain more information concerning these rights at www.dataprotection.ie.

- Alimera Sciences Europe Limited does not allow for any “partial disclosure”: For HCOs, 100% individual level disclosure is mandatory. As stated above, individual HCPs and ORDMs can object in writing to specific disclosure, subject to the Company’s consideration of whether legitimate interest exists to disclosure such ToVs.
- Health Care Organisations (HCOs) are informed in their contract that the company will disclose all ToVs to them.
- All contracts and agreements are reviewed and approved so they are compliant with the IHPA 2021 Code and are then recorded on Alimera approval systems prior to any payments.

2. Recording of all ToV payments:

- All company payments which include potential ToV payments to HCPs, ORDMs or HCOs require a contract / agreement and are pre-approved in terms of the reason for, category and value of those payments. This is part of the internal approval process when a meeting or project is being organised.
- Payments are paid per event or activity.
- All invoices related to such ToV payments are coded by the project administrator before being submitted to the Finance Department for processing, approval and payment.

3. Collation of ToV payments:

- All 2023 ToV spends are collated manually using a centralised spreadsheet and checked against payments recorded on the Alimera ContractWorks/ Concur Finance system.
- All payments made in a year to one HCO/HCP/ORDM for multiple events or activities
- Within the same category are collated as one figure under that ToV category. e.g. If an HCP/ORDM has attended 2 meetings and has 2 registration fees paid this will appear as one figure under the registration fee category.
- At the appropriate time a report is produced summarising the ToV spends by category associated with each individual HCP/ORDM and each HCO. This is in the format of the IPHA

central report disclosure template.

- A data quality check will be made at the end of this process. To aid this process, all HCPs/ORDMs who have committed to disclose will be sent a courtesy letter informing them of their individual ToV payments which will be submitted. They will be able to contact the company before submission if they have any queries or concerns.

4. Submission of Data

- The data is submitted electronically to the IPHA for uploading onto the ToV central database for HCPs, HCO's and ORDMS using the current IPHA template for disclosure of ToV (IPHA 2021).

5. Disclosure:

- ToV disclosure is made on the IPHA ToV disclosure templates in line with the requirements of the IPHA Code 2021 and IPHA Central Report (www.ipha.ie)
- Individual disclosure is listed under ToV category and by HCP/ORDM name.
- Note that ToVs paid to HCPs/ORDMs for contracted services are categorised separately from delegate attendance at meetings.
- When an HCP/ORDM has declined individual disclosure amounts are listed in the aggregated column.
- HCO disclosure is listed by their business/practice name and ToV category.
- Research and Development TOVs (e.g. clinical trials) and subsidiary activities to these (e.g. investigator meetings) are disclosed in an aggregated category.

6. Other considerations:

- Payments are presented in Euros
- Each ToV is accounted for in the year it is paid, rather than the year the event/activity happened if they are different.
- Consultancy: HCPs/ORDMs/HCOs are paid per event/project when they have provided services to the company. The disclosure amount listed against an HCO/HCP/ORDMs name is for all consultancy services provided during 2022 and may relate to more than one event.
- ToV paid by the company is presented exclusive of VAT or other taxes
- Multi-year contracts have not been employed during 2023.
- In the situation where an HCP/ORDM is an employee of Alimera Sciences and still practises their profession part-time in a public Irish healthcare setting only transfers of value made related to their public healthcare role will be declared.

- Private Companies: Where an HCP/ ORDM runs a private company (where he/she is the only HCP/ORDM employee of that company), Alimera Sciences discloses the transfer of value to the individual HCP/ORDM subject to consent being in place.
- Cross- border payments have not been made to Irish HCPs, ORDMs or HCOs during the calendar year 2023 i.e. UK HCPs/ORDMs are paid only from the Ireland office.
- When payments are made for invoices arising from outside of Eire the currency conversion rate to Euro used is the currency current at time of payment (e.g. payment for hotel accommodation at conferences outside Eire)
- Alimera Sciences Europe Limited made no non-monetary transfers of value during 2023.
- No medical device transfers of value are included as they are not applicable to the Alimera Sciences Europe Limited.
- No over-the counter transfers of value are included as they are not applicable to the Alimera Sciences Europe Limited.
- No transfers of value have taken place which involve joint working or collaboration with other pharmaceutical companies or healthcare related organisations.
- Indirect ToVs paid to HCOs through Professional Conference Organisers will be reported in line with the requirements of the IPHA Code 2021.

Definitions:

Consultancy: An HCP, other relevant decision maker is engaged to provide a service, either directly by the company, or indirectly by company agents or contractors. This includes speakers at Alimera Sciences Europe Limited organised meetings and participants in advisory boards.

They are paid “fair market value“ which is an amount that reflects the complexity of the task and time taken as well as the expertise and status or position of the HCP.

Healthcare professional (HCP): For purposes of making disclosures pursuant to the IPHA- HCPs are defined as a person of any of the following classes: registered medical practitioners, registered dentist, registered pharmacists or registered nurse. *IPHA Code 2021*

Where HCPs are employed directly and exclusively by the Company their salary and benefits are outside the scope of the Company’s disclosure.

Other relevant decision makers (ORDM): For purposes of making disclosures pursuant to the IHPA - ORDMs are defined as persons involved with delivery of healthcare in a role who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply or use of any medicine but who are not health professionals.

Healthcare organisation (HCO) - Either a healthcare, medical or scientific association or organisation such as a hospital, clinic, foundation, university, or other teaching institution or learned society (except for a patient organisation) whose business address, place of incorporation or primary place of operation is in Europe or an organisation through which one or more health professionals or other relevant decision makers provide services. *IPHA Code 2021*

Grants, Healthcare support services and other forms of Support: Support may be given to organisations

in the form of educational, research or employment grants, donation, or sponsorship of equipment for the betterment of patients. If support is provided it is only to institutions, organisations, or associations and NOT to individuals. *IPHA Code 2021*

Healthcare Support Service (HSS): a process enhancement or medical service support that ultimately improves patient care and welfare (e.g. patient compliance initiative, sharps bin service, disease identification, screening or genetic marker test, review of patient management). *IPHA Code 2021.*

Sponsorship: provision of a contribution, financial or otherwise, in whole or in part provided by or on behalf of a company, towards an activity (including an event/meeting or material) performed, organised, created etc. by a healthcare organisation, patient organisation or other independent organisation. *IPHA Code 2021*

Support for attendance: provision of a financial contribution, in whole or in part, whether paid directly or indirectly to individual HCPs or ORDMs to attend events/meetings.

Patient Organisation (PO): Organisations run for or by patients/public (although HCPs may also be involved), including user organisations such as disability organisations, carer or relative organisations, and consumer organisations. *IPHA Code 2021.*

Research & development (R & D) ToVs: Transfers of value to healthcare professionals or healthcare organisations 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 Directive 2001/20/EC); 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, healthcare professionals specifically for the study.

IPHA Code 2021

R&D transfers of value will be disclosed in an aggregate form in line with IPHA Code of Practice requirements.