

Reykjavik, December 2014.

To whom it may concern:

The <u>EFPIA Disclosure Code</u> will effectively come into force 1. January 2015. Althoug <u>Frumtök</u> is not a formal member of EFPIA we acknowledge the Discloslure Code and fully implement it, as we have done with the <u>EFPIA HCP code</u>. This decision has been approved by Frumtök's board and discussed at Frumtök's members meeting with no objections.

In January 2013 the Federation of Trade and Services and the Icelandic Federation of Trade joint with us in Frumtök and signed an agreement with the Icelandic Medical Association, formally agreeing that the HCP code with future additions + local appendixes shall be the foundation of our interactions. What is especially positive is the fact that the Federation for Services and Trade and the Icelandic Federation of Trade signed it onbehalf of their member companies, including companies such as Actavis, Icepharma and Vistor (and consequently applicable to all MAHs serviced by these companies in Iceland). In fact this means the whole pharma industry in Iceland has signed to use the EPFIA codes as a foundation to its interactions with health care professionals.

Implementation of the <u>Disclosure Code</u> is on track. We've had several meetings presenting the purpose and basic framework of the Code.

The Code is clearly raising some questions within the HCPs community but the reactions, f.ex. from the heads of the National Hospital is both promising and positive. The Hospital's governors and the Board of the Hospital's Committee of Doctors accept and agree with the fundamentals of the Code and will actively help us promoting the Code. Similarly, we have received positive reaction from the Icelandic Medical Association.

Our member companies are understandingly asking how disclosure will be solved in Iceland. It is clear that each company will make its own decisions regarding its disclosures, but it has been decided that we will offer our member companies the service of publishing the Disclosure Reports on our website. The official EFPIA Disclosure template, *The Template*, has been translated in to Icelandic and will be made available for those who request it.

On behalf of Frumtök,

Jakob Falur Garðarsson, framkvæmdastjóri.