

To  
the Honourable  
Mr Eleftherios Papageorgopoulos  
President of EOPYY

Cc.: Mrs Fotini Perdiki, Head of the Directorate of Financial Services and Conclusion  
of Contracts

Chalandri, April 30, 2013

**Subject: Calculation of 2013 clawback**

Dear Mr Papageorgopoulos,

Given that we are already through the end of the 4<sup>th</sup> month of 2013 and the calculation of the clawback amount owed by each pharmaceutical company is imminent, we would like to forward you in writing our suggestion for the above issue, taking into account the experience in the preceding year and the problems that emerged, which may, in an any case must be avoided.

More specifically, as you are aware, while in the first six-months period of 2012, there was an excess of the monthly expenditure, in the second six-months period the expenditure was below the monthly target. This resulted to the fact that pharmaceutical companies were unfairly encumbered with the clawback amount of the first six-months period, and the said amount has not, until today, been off-set against the “negative clawback” of the second six-months period.

Taking into account the above and given that: a) the target of the outpatient pharmaceutical expenditure is annual (i.e. €2.44 billion for 2013/ €203.33 million on a monthly basis) and not for a six-months period, b) the course of pharmaceutical expenditure is declining, due to the reduction of the volume and of the measures that have been and are adopted, we suggest that the 2013 clawback is calculated as follows:

- **The monthly expenditure for the first six-months period (€203.33 mil.) be supplemented by an additional amount of Euro 10 mil., and consequently, the calculation basis for the clawback of the first six-months period, be set to 213.33 mil.**
- **The monthly expenditure for the second six-months period be reduced by Euro 10 mil, and consequently, the calculation basis for the clawback of the second six-months period, be set to €193.33 mil.**

In this manner, the declining course of the pharmaceutical expenditure for the first six-months period is depicted, in relation to the second six-months period and the proper calculation of the clawback on an annual basis is achieved.

Yours sincerely,

Konstantinos M. Frouzis  
President

Pascal Apostolides  
Vice President