

Dear Healthcare Professional:

Alimera Sciences, Inc. is committed to complying with the Physician Payments Sunshine Act (Sunshine Act) and has developed the processes to capture and report payments and transfers of value to healthcare professionals (HCPs) as required by that law. We recognize that HCPs have a professional duty to make treatment decisions in the best interests of their patients. The welfare of patients is the common purpose that Alimera Sciences shares with HCPs. Transparency in our interactions with HCPs helps to ensure that those interactions are in the best interests of the patients we serve.

The Sunshine Act requires that Alimera Sciences report data on most types of payments and transfers to the Centers for Medicare and Medicaid Services (CMS). Reportable payments and transfers include:

- Meals
- Payments for services (for example, consulting and speaking fees/honoraria)
- Reimbursements for travel expenses
- Educational items (for example textbooks and subscriptions)
- Research/clinical trial payments
- Educational grants
- Charitable contributions

Alimera Sciences has begun capturing 2015 data on payments and transfers of value, effective March 26<sup>th</sup> that we will be required to report in March 2016. We also will be reporting data on payments and transfers consistent with state law requirements. Included among the data that we are capturing for reporting purpose are:

- Name and business address
- Specialty
- National Provider Identifier (NPI) and state license number (as applicable)
- Amount of payment
- Date of the payment
- Form of payment
- Nature of payment
- Name of product to which the payment relates (as applicable)

CMS will post this data on its website located at <http://www.cms.gov/OpenPayments/index.html>. Also available from CMS is a Fact Sheet for Physicians, which is located at <http://www.cms.gov/OpenPayments/Downloads/Fact-Sheet-for-Physicians.pdf>.

Attached you will find a Frequently Asked Questions document that provides additional information on Alimera Sciences' federal and state reporting obligations. If you should have other questions, you may contact Alimera Sciences at [Sunshine@alimerasciences.com](mailto:Sunshine@alimerasciences.com).

Sincerely,

Ken Green, PhD  
Chief Compliance Officer  
Alimera Sciences, Inc.

## Frequently Asked Questions

**Q. What is the Sunshine Act?**

A. The Sunshine Act is a section of the Patient Protection and Affordable Care Act of 2010 that requires pharmaceutical companies to report to the Centers for Medicare and Medicaid Services (CMS) information relating to payments and transfers of value made to physicians and teaching hospitals. The Sunshine Act also requires companies to report physician ownership and investment interests. The Information reported to CMS under the Sunshine Act is made publically available on the CMS web site.

**Q. Will Alimera report payments and transfers of value to HCPs?**

A. Yes, Alimera will report payments and transfers of value to HCPs consistent with the Sunshine Act and state laws requiring such reports.

**Q. What states also require reporting of payments and transfers of value to HCPs?**

A. In addition to reporting payments and transfers of value to CMS, three states (Massachusetts, Minnesota, and Vermont) and the District of Columbia require that pharmaceutical companies report payments and transfers of value to HCPs other than physicians and teaching hospitals. While these states cannot require reporting of payments and transfers to physicians, they can and do require reports of payments and transfers to various other HCPs. Alimera will report payments and transfers to these other HCPs consistent with state law requirements and also will comply with any restrictions (e.g., meal limitations or prohibitions) that state laws place on payments and transfers to HCPs, including physicians.

**Q. What types of payments must be reported?**

A. Virtually any type of payment or transfer of value must be reported, including meals, payments for services (for example as speakers, advisors, and consultants), educational items (including textbooks and subscriptions), reimbursements for travel expenses, research/clinical trial payments, educational grants, and charitable donations.

**Q. Will Alimera be reporting the amounts of meals provided to HCPs?**

A. Yes. Alimera will be reporting meal amounts consistent with the Sunshine Act and state law requirements. At the federal level, Alimera will report the amounts of meals provided to physicians. At the state level, Alimera will report the amounts of meals provided to other HCPs as required by state law. Alimera will track all of the individuals who attend a meal provided by the company to allow for the accurate calculation of the per-person cost of the meal, but will only report meal amounts provided to those HCPs for whom the various laws require reporting.

**Q. What if the value of the meal is under \$10?**

A. The Sunshine Act excludes from reporting those payments and transfers of value under \$10, so meals under \$10 will not be reported, except if the aggregate amount of all payments and transfers provided to an HCP over the course of a year exceeds \$100, then Alimera must report all payments and transfers regardless of value. Once the \$100 threshold is crossed, even a \$5 meal would need to be reported so Alimera will track all payments and transfers regardless of value.

**Q. Can an HCP opt not to receive payments or transfers of value from Alimera and avoid being included on an Alimera report?**

A. Yes, an HCP can opt to not receive payments or transfers of value from Alimera. For example, an HCP can choose not to participate in a meal provided by Alimera, including a lunch brought into an office or a dinner provided at an Alimera-sponsored event or program. If an HCP chooses not to eat a meal provided by Alimera (or chooses to pay for the cost of the meal) then they won't be included on an Alimera report.

**Q. Can an HCP have a fee for a service provided to Alimera (e.g., as a speaker, advisor, or consultant) paid to a third party?**

A. The fee can be paid to a third party but Alimera will report the payment as having been made to the HCP that earned the payment. The third party also will be included in the report.

**Q. Where can I get more information about the Sunshine Act?**

A. You can get additional information at the CMS Open Payments web site – <http://www.cms.gov/OpenPayments/index.html>.

**Q. Who can I contact at Alimera to get more information?**

A. For more information, please contact Alimera at [Sunshine@alimerasciences.com](mailto:Sunshine@alimerasciences.com).

**Q. What if I don't agree with what Alimera is reporting about me?**

A. If you do not agree with a reported payment or transfer of value and opt to dispute, you may do so formally through the CMS Open Payments website during the review and dispute period (which typically starts immediately after federal reports are filed and goes for 45 days). If you register with the CMS Open Payments website you will be able to review all of your transactions for that reporting year and can dispute formally via the CMS site. A dispute notification will be sent to Alimera Sciences for review. Alimera Sciences will then review the disputed record and the reason for the dispute and determine if the dispute is valid. If it is valid, then the transaction will be removed.