

Methodological note for Teva UK Limited

1. A general summary of the methodologies used in preparing the disclosures and identifying each category of transfer of value (TOV)

- a) The lawful basis used to publish individual HCP/ORDM information is Consent.
- b) Self-incorporated health professionals are treated as individual HCPs for the purposes of disclosure and reported as such.
- c) There are no individuals for whom some payments are disclosed individually and some in aggregate. The consent wording applies to all disclosable TOVs in the reporting period, and is drafted such that the individual's most recent consent status will prevail for all transactions for the year.
- d) It is noted that disclosure of subsistence provided to individuals is not required, however some meal provision may be included in the data (particularly where TOVs have been provided by other affiliates) in preference to understating the relevant amounts. Many accommodation-related TOVs are inclusive of breakfasts and no attempt has been made to deduct the value of breakfast provision from the sums disclosed.
- e) Over-the-counter and medical device TOVs to recipients outside the scope of the ABPI Code would not be included. There are no disclosable TOVs to recipients otherwise in scope of the Code, however in the event that there were they would be included in disclosure without distinguishing them from other TOVs.
- f) The terminology for various types of TOV is consistent with the meaning of those transactions as defined in the ABPI Code.
- g) Any non-monetary TOVs, and any arrangements under which a TOV has been divided between parties, have been quantified on the basis of the actual monetary cost to Teva.
- h) We are not aware that any HCP disclosures relate to retired or deceased HCPs.
- i) In the case of sponsorship of individuals to attend an educational event, there is not deemed to be a TOV if the HCP is unable to attend (for example due to illness); TOVs would only be disclosed where the individual actually receives the hospitality.
- j) The aggregated figure for R&D relates to TOVs made by Teva's non-UK affiliates and entities. The figure for R&D conducted by Teva's UK entities is zero. Human factors studies conducted by Teva's UK entities do not fall within the R&D exemption defined by the Code and therefore any such TOVs are if applicable disclosed on a named basis against the relevant HCP participants and in aggregate for members of the public.
- k) Multiple internal data sources are used to check and validate disclosure data including checks on any cross-border activity and matching between approval systems and ERP.

2. Treatment of multi-year contracts

- a) Where a TOV relates to activities or expenses wholly or partly occurring in a different reporting year from the deemed date of the TOV as defined in clause 5 below, no accruals will be made for disclosure purposes.
- b) Where a Collaborative Working initiative, benefits in kind to HCOs or fee for service arrangement involves staged payments or other multiple TOVs, all transfers occurring in the same reporting period will be disclosed as a single total. Separate TOVs of value for the same activity that are deemed to occur in different reporting periods will be disclosed in respect of the applicable years. No accruals will be made for disclosure purposes.

3. Treatment of VAT and other tax aspects

- a) Individual and corporate recipients are liable for declaring the revenue and benefits provided to them directly or indirectly, including any payments made to employers on behalf of individuals, and for paying any income tax, corporation tax and the like arising in respect of TOVs.
- b) TOVs relating to Collaborative Working initiatives are where applicable disclosed exclusive of any VAT.
- c) TOVs relating to benefits in kind to HCOs are where applicable disclosed exclusive of any VAT. Expenses associated with benefits in kind to HCOs are disclosed as set out in (e) below.
- d) TOVs relating to service-related honoraria (whether for individual consultancy or corporate service providers) are where applicable disclosed exclusive of any VAT. Expenses associated with fee for service activities are disclosed as set out in (e) below.
- e) TOVs relating to hospitality and expenses (including meeting registration fees, accommodation and travel) are declared gross (e.g. ticket face value) and therefore include VAT where applicable.

4. Currency aspects

- a) All disclosed TOVs are expressed in GBP.
- b) Any payments remitted or costs incurred in another currency have been converted into GBP, either at the spot rate for the relevant date or by applying the average exchange rate for 2024 in accordance with the rate tables published online by HMRC. Where applicable £1 = US \$1.2787 and £1 = €1.1789.

5. Other issues relating to the timing and amount of transfers of value

When determining whether a TOV falls into the 2024 reporting year, the deemed date of transfer of value to the recipient has as far as possible been defined by Teva UK as follows, irrespective of the actual date of remittance:

The date on which funds were due under the contract, or the date of the relevant trip or activity, or the date on which services were provided to Teva*;

except Patient Support Programmes (PSPs) and Collaborative Working, where the TOVs are calculated based on actual remittances to vendors during the year.

*Where billable preparation time is incurred and/or a follow up report or meeting is part of the service, the service date for the purposes of TOV is defined as the start date of the principal meeting.

6. Patient Organisations

The methodology set out above applies also to transfers of value to Patient Organisations, which are published separately and available via a link on the Teva UK website.

7. Members of the Public, Patients and Journalists

The methodology set out above applies also to transfers of value to Members of the Public, Patients and Journalists, which are published separately and available via a link on the Teva UK website.