Aguettant Limited

Methodology for Transparency Disclosure 2024

Aguettant Limited recognises the importance of transparency in its interactions with healthcare professionals (HCPs), healthcare organisations (HCOs), other relevant decision makers (ORDMs), patient organisations, and the public. Although not an official member of the Association of the British Pharmaceutical Industry (ABPI), Aguettant Limited has given formal agreement to adhere to the 'ABPI Code of Practice for the Pharmaceutical Industry 2024' and accepts the jurisdiction of the Prescription Medicines Code of Practice Authority (PMCPA).

Scope and Governance

The transfer of value (TOV) disclosures for the 2024 reporting period are conducted in accordance with the 'ABPI Code of Practice for the Pharmaceutical Industry 2024'.

Specifically, the following clauses of the Code are relevant to this disclosure:

- Collaborative working, including joint working, in accordance with Clause 20.
- **Donations and grants** provided to healthcare organisations, institutions and other organisations in accordance with Clause 23.
- Fees and expenses paid for contracted services between companies and institutions, organisations or associations of health professionals, in accordance with Clause 24.6.
- Support of attendance by health professionals and other relevant decision makers at events/meetings whether paid directly, indirectly or via another party in accordance with Clause 10.11.
- Fees and expenses paid for contracted services to health professionals and other relevant decision makers, or to their employers on their behalf, in relation to Clause 24.6.
- **Sponsorship**, including contributions to costs related to events/meetings paid to healthcare organisations or to organisations managing events on their behalf, which may include support of health professionals not known to the company via the healthcare organisation by way of registration fees, accommodation and travel, in accordance with Clause 10.12.
- Interactions with the public including patients, journalists and patient organisations, in accordance with Clauses 26-27.

While Aguettant Limited is not an ABPI member, we align with the Code and ensure full compliance with its principles regarding transparency.

Procedure for Disclosure

1. Recording and Reporting of Transfers of Value

Aguettant Limited, in collaboration with its parent company and other affiliates, diligently records all transfers of value made to UK-based HCPs, ORDMs, and HCOs. Each transfer is tracked contemporaneously to ensure accuracy in reporting. Transfers of value considered for the 2024 disclosure include:

- Consultancy Fees paid to HCPs (for speaker roles, advisory boards, safety talks) and associated expenses.
- Contributions toward the costs of events (e.g., sponsorship fees for conferences, exhibitions and meetings) and associated registration fees and expenses.

2. Data Management and Reconciliation

All TOV data is collected by the Senior Leadership Team, stored securely, and then added to the PMCPA mandatory template in preparation for the declaration disclosure. This system captures all relevant financial transactions, ensuring transparency and consistency.

3. Internal Review

Before disclosure to the central platform managed by the ABPI, the records are cross-checked and internally verified. Aguettant conducts an internal review to confirm that all required transfers of value have been appropriately captured, validated, and reconciled.

Data Privacy Compliance

Aguettant Limited is committed to maintaining confidentiality and adhering to data privacy laws, including the General Data Protection Regulation (GDPR). All personal data associated with the transfers of value (e.g., names, roles, and payments to individual HCPs is disclosed only with the explicit consent of the concerned individuals. This consent is obtained through contractual agreements signed by HCPs with Aguettant Limited, which grants the company permission to disclose relevant financial information as required by the ABPI Code of Practice. Contractual agreements are

either drawn up for specific events or established on a yearly basis, with regular reviews to ensure they remain up-to-date and compliant with relevant regulations.

Payments and Reporting Period

- **Reporting Period**: The disclosure only includes payments made within the calendar year 2024 (1 January to 31 December 2024).
- **Payment Dates**: Only payments made in 2024 are reported, regardless of when the agreements or contracts were signed.

Currency and Exchange Rates

For payments made in currencies other than GBP, the amounts have been converted into GBP using the monthly exchange rate for the corresponding month in which the payment was made. This ensures consistency and fairness in the reporting of financial data across different currencies.

VAT Considerations

The transfers of value are disclosed **exclusive of VAT**, except where VAT is non-reclaimable by Aguettant Limited. In such cases, VAT is included in the disclosed transfer of value.

2024 Transparency Disclosure Breakdown

In 2024, Aguettant Limited made the following transfers of value:

1. Consultancy Fees Paid to Healthcare Professionals:

- One Consultant was paid for their role as a speaker during a companysponsored event, with associated expenses such as travel, and accommodation also covered. The payment was made in euros, and the amount converted to GBP using the exchange rate for that month.
- One registration fee was paid for a Consultant to attend a masterclass as part of their professional development.

2. Contributions Towards the Costs of Events:

Aguettant Limited attended 23 events throughout 2024. These events
included medical and scientific conferences/exhibitions and meetings.
The fees paid to healthcare organisations or third-party event organisers
for exhibition packages, registration fees, and sponsorship costs are fully
disclosed.

3. Donations, Grants and Benefits in Kind to HCOs:

• No donations, grants, or benefits in kind were provided to healthcare organisations in 2024.

4. Patients, Journalists and Patient Organisations

• No transfer of value were made to patients, journalists or patient organisations.

Centralised Reporting and ABPI Platform Submission

All TOVs made by Aguettant Limited, its parent company, and other affiliates from 01 January to 31 December 2024 have been disclosed on the central platform, Disclosure UK, managed by the ABPI, in accordance with the guidelines set out in the ABPI 'Code of Practice for the Pharmaceutical Industry 2024'.

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