

## **FRESENIUS KABI LIMITED AND CALEA UK LIMITED METHODOLOGICAL NOTES FOR REPORTING 2023**

In accordance with ABPI requirements, Fresenius Kabi Limited and Calea UK Limited (**Fresenius Kabi UK**) ensure that the nature and scope of any Transfers of Value with healthcare professionals and healthcare organisations are clear and transparent.

This Methodological Note provides guidance on how Fresenius Kabi UK have collected and reported this information. We have published Transfers of Value paid directly or indirectly for the period from 1 January 2023 to 31 December 2023.

Transfers of Value made to Patient Organisations and members of the public are disclosed separately on the Fresenius Kabi GB website [Transparency Initiative - Fresenius Kabi Great Britain \(fresenius-kabi.com\)](https://www.fresenius-kabi.com/Transparency-Initiative)

When we talk about **Transfers of Value (ToV)** we mean a direct or indirect transfer of value, whether in cash, in kind or otherwise made, whether for promotional purposes or otherwise, in connection with the development or sale of medicines.

Where a ToV is non-monetary in nature, the calculation of the ToV is explained in the section below.

Please note that not all of our products and related ToV are in relation to medicinal products for human use. We will disclose ToV for all business areas to which the ABPI Code of Practice applies, whilst there will also be certain ToV that are not subject to the ABPI Code of Practice such as enteral nutritional products or medical devices but will be included in disclosure as some ToV will include interactions that are a combination of business areas, for example, educational support at a large third-party event where multiple business areas attend. This exceeds the ABPI requirements and avoids attempting to isolate certain interactions.

The term **healthcare professional** includes members of the medical, dental, pharmacy and nursing professions and any other persons who in the course of their professional activities may administer, prescribe, purchase, recommend or supply a medicine.

The term **healthcare organisation** means either a healthcare, medical or scientific association or organisation such as a hospital, clinic, foundation, university or other teaching institution or learned society whose business address, place of incorporation or primary place of operation is in the UK, or an organisation through which one or more health professionals or other relevant decision makers provide services.

The term **Other Relevant Decision Maker (ORDM)** includes those with an NHS role who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply or use of any medicine but who are not health professionals.

<b>ToV disclosed against individual healthcare professionals or ORDMs</b>	
Fees for service and consultancy and associated related expenses agreed in the fee for service or consultancy contract	We pay fair market value for the provision of services. This may include services such as chairing or speaking at meetings and participating in advisory boards. Agreements are put in place and fees and any expenses are documented. Where ToV have been made to the hospital or trust rather than the individual this has been recorded as a payment to an HCO.
Sponsorship of HCPs/ORDMs for attendance at meetings including registration fees and related expenses.	<p>We may provide contribution to costs for HCPs or ORDMs to attend third party organised meetings. This may also include related registration fees, accommodation and related travel expenses.</p> <p>We may reimburse travel and accommodation when HCPs/ORDMs attend Fresenius Kabi organised events.</p> <p>For certain Fresenius Kabi UK internally developed programmes and some events hosted virtually, we have disclosed a ToV using a value for a comparable course or event.</p>

<b>ToV disclosed against HCOs</b>	
Contributions to cost of meetings and events	Fresenius Kabi UK disclose all payments to HCOs where the ABPI Code of Practice applies. This includes direct funding and may also include contribution to cost of events including rental of booths at an event, advertisement space, satellite symposiums or congresses or sponsorship of speaker or faculty. This may also include travel and accommodation.
Fees for services and consultancy	Fees paid to HCOs for the provision of services and consultancy are reported as a fee against the relevant HCO.
Collaborative Working and Joint Working	In accordance with the ABPI Code, Fresenius Kabi UK will disclose its financial contributions to collaborative working projects when it makes the payment to the HCO.

Fresenius Kabi does not include any free of charge products provided to HCOs under a commercial arrangement as these are out of scope.

### **Other considerations**

**Data Privacy:** The agreements between Fresenius Kabi UK and HCPs/ORDMs have a section referring to Disclosure UK and transparency which sets out Fresenius Kabi UK disclosure obligations. Fresenius Kabi UK rely on legitimate interests as the legal basis to process and share data information for disclosure purposes in line with the Fresenius Kabi UK Data Protection Statement which can be found [here](#). Where HCPs communicate that they do not wish to disclose payment information, any such payments are reported on an aggregated basis.

**Disclosure of HCPs and institutions:** Where an HCP is not affiliated with an institution or healthcare organisation, any disclosure for that HCP has been disclosed without an institution name.

Where an HCP has changed institution or is affiliated with different institutions during 2023, there may be more than one ToV shown against that HCP for disclosure purposes.

**Cross border activity:** Reportable transfers of value provided by Fresenius Kabi affiliates to UK HCPs and HCOs have been included as part of the Disclosure UK exercise. Fresenius Kabi UK use best endeavours to either obtain the consents necessary to disclose transfers of value at the individual level or rely on legitimate interests as the legal basis for disclosure purposes.

**Reporting:** We will look at whether the event or ToV took place within the reporting period 1 January 2023 to 31 December 2023.

**VAT:** Where applicable, disclosure of payments does not include VAT. Cross border transfers of value may include VAT depending on the source.

**Exchange Rate:** For services provided outside of United Kingdom, ToV are reported in £GBP. Where transfers of value are reported in foreign currency, amounts are converted to £GBP using a single annual exchange rate for each currency.

**Multi-year Contracts:** Where activities straddle calendar years, the amounts paid in the relevant year will be disclosed.

Where any issues are raised with reporting, we will review and any changes resulting from this review will be published in an updated report.

In case of any questions relating to this methodology please contact:

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