

28<sup>th</sup> January 2025

## Methodological note for Valneva UK Transfer of Value Disclosure 2024.

**As an ethical pharmaceutical company, Valneva UK Ltd takes its' responsibilities under the ABPI code of practice very seriously, and therefore has clear standard operating procedures in place for the approval and processing of all transfers of value to healthcare professionals (HCPs), healthcare organisations (HCOs), other relevant decision makers (ORDMs), Patient Organisations (POs), including charities and members of the public (MoP). All requests for support from healthcare professionals and all engagement of healthcare professionals' services undergo a rigorous approval process to ensure the ABPI Code of Practice is adhered to. All transfers of value and relevant approval documentation are recorded and saved for 5 years.**

Valneva has prepared this document to outline the Company's interpretations and assumptions made and methodologies used in complying with the requirements to disclose payments to Healthcare Professionals (HCPs), Healthcare Organisations (HCOs) and Other Relevant Decision Makers (ORDMs) under the Code of Practice 2021 administered by the Prescription Medicines Code of Practice Authority (PMCPA), further in the document referred to as the Code.

In line with the Clause 1.25 of the Code, Valneva defined "transfer of value" as all transfers of value, be it in cash or in kind, direct and indirect made to the health professionals, other relevant decision makers and healthcare organisations based in the United Kingdom. Information supplied was verified through publicly available information and information from third party vendors, in order to narrow down the list of payees to those that fell within the definitions of healthcare professionals,

Bank Barclay's Bank Swift BARCGB22  
GBP Current Account GB57 BARC 2059 5073 8525 63 Sort Code 20 59 50 Account Number 73852563  
Euro Current Account GB87 BARC 2059 5083 8107 22 Sort Code 20 59 50 Account Number 83810722  
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other relevant decision makers and healthcare organisations as set out in the Clauses 1.8, 1.9 and 1.13 of the Code.

In compliance with Clauses 4, 10, 20, 23, 24, 28 of the Code, Valneva first identified all the possible sources of information within the Company's finance system and held by third party vendors that contained all transfers of value made by Valneva to health professionals, other relevant decision makers and healthcare organisations. In order to prevent any loss of information, the list from finance was compared to the record compiled throughout the year by the Medical Affairs and Commercial team from all the contracts/agreements and payment requests related to interactions with health practitioners, other relevant decision makers and healthcare organisations based on approval and certification documentation held for compliance purposes.

Any inconsistencies between the two lists were resolved through internal consultation or by contacting the relevant payee to resolve any doubts. An assessment was made as to the hourly charge of each contract to ensure that the charge was fair market value. Activities were assessed to ensure that contractor input was necessary for the success of each project. Activities where contractor input was deemed necessary were notified in advance and the contractor could opt in or out of taking part in that activity or project.

Based on the complete dataset Valneva has endeavoured to disclose to the ABPI for publication on its' central platform all direct and indirect transfers of value (ToVs) made between 1 January 2024 and 31 December 2024 inclusive that fall within its' disclosure obligations as set out in Clauses 4, 10, 20, 23, 24, 28 of the Code, applying the relevant definitions contained therein.

Payments made after December 31, 2024 for events that took place in 2024 will be included in the 2025 report as the Transfer of Value will be recognized based on the payment date and not on the date of the event.

The Company has taken reasonable efforts to validate all data included in the submission to ensure all data elements are collected, and that the data elements are current, accurate and complete (including that they accurately reflect the interaction that took place, e.g. that the value reported is consistent with the value on a related receipt).

The ToVs data is based on any direct or indirect ToV, whether monetary, benefit in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and/or sale of prescription only medicinal products for human use. This includes, but is not limited to, payments of fees for services, consultancy and associated expenses, registration fees, sponsorships, grants, donations, travel, accommodation.

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#### **Consent**

Valneva commits to seek consent from all health professionals to disclose on an individual basis, naming the recipient and identifying the ToV. To this end, the Company has incorporated a clause to this effect in the contractual templates on the basis of which, pursuant to Valneva's relevant policies, all such engagements should proceed. In circumstances where a healthcare professional declines to give, or subsequently withdraws consent to disclose on an individual basis of ToV during the reporting calendar year, the Company has disclosed all ToVs made to that health professional in aggregate.

#### **Donations and Grants to HCOs and Benefits in Kind to HCOs Donation**

Financial support for an institution, non-profit or organisation, typically for general support rather than a specific purpose, with no influence or control exerted by the Company.

#### **Grant**

Financial support for an institution or organisation, typically for a specific purpose, with no influence control exerted by the Company.

#### **Benefit in Kind**

Transfers of value in kind or pecuniary form to an institution or organisation with no influence or control exerted by the Company.

#### **Sponsorship agreements with HCOs/third parties appointed by HCPs to manage an Event**

Support for a specific event, activity or item which is organised and or produced by, or for, a third party. This may include financial support, goods or services.

#### **Registration Fees for Events**

Support in the form of payment of registration fees for the events organised and or produced for by the Company or by third party, both inside and outside the UK.

#### **Travel and Accommodation for Events**

Support in the form of payment of travel and accommodation for the events organised and or produced by the Company or by the third party, both inside and outside the UK. Fees for service and consultancy Fees paid to HCPs and ORDMs, or to their employees on their behalf for certain services rendered, such as chairing and speaking at meetings, assistance with training and participation in advisory boards etc.

#### **Related Expenses agreed in the fees for service or consultancy contract**

Expenses paid to HCPs and ORDMs, or to their employees on their behalf in relation to the certain services rendered, such as chairing and speaking at meetings, assistance with training and participation in advisory boards etc.

#### **Dispute Resolution**

Valneva will attempt to resolve disputes with Recipients. Upon notification that a dispute has been initiated, the Company will review and attempt to resolve each dispute on an individual basis. If a resolution cannot be reached, the reported Transfer of Value will be moved into the aggregate section of the database.

#### **Currency**

Valneva has made its disclosures in sterling, using a published monthly average exchange rate with sterling for those payments made in any other currency. Tax The Company has made its disclosures relating to direct ToVs exclusive of all applicable taxes i.e VAT. It is possible, however, that some indirect ToVs made by third party vendors have been reported to us inclusive of taxes.

#### **Date methodology**

Valneva has made its' disclosures relating to cash payments by reference to the payment date. In circumstances where ToVs represent benefits in kind, the Company has made its disclosures by reference to the date of the event/activity where the ToV occurred.

Valneva UK has no multi-year contracts for individual external contractors. There were no over-the-counter transfers of value or medical device transfers of value for 2024. There were no further contracts, donations, grants or sponsorships made to HCPs or HCOs in 2024.

Grants and donations to non-HCOs such as charities and patient organisations are not disclosed on the ABPI platform. Any such payments made by Valneva will be disclosed on the Valneva website.

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