

# Methodology document for CSL Seqirus UK

28th March 2024

**Introduction**

This core methodology note provides guidance on the CSL Seqirus-specific decisions that relate to how we collect, aggregate, and report disclosure data relating to:

- Individual healthcare professionals (HCPs)
- Healthcare organisations (HCOs)
- Other relevant decision makers (ORDMs)

This note outlines the global position from CSL Seqirus in relation to the EFPIA Disclosure Code. Practice in each country affiliate will depend on local laws and requirements of the local industry code.

Transfers of Value made to Patient Organisations and the e Public, Including Patients and Journalists will continue to be disclosed separately on the CSL Seqirus website

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Section 1: Data collection and reporting	<ul style="list-style-type: none"> <li>• Company-specific decisions on how we gather, analyse, and report data</li> </ul>
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Item	CSL Seqirus decision
Tax and VAT	We will publish the total Transfer of Value paid by CSL Seqirus, or its 3 <sup>rd</sup> Party Contractor, including VAT where applicable
Transfer of Value dates	<p>We will disclose payments and TOV based on the data on the reporting period within which the TOV was made.</p> <p>For example, this is:</p> <ul style="list-style-type: none"> <li>• The date payment was made to the recipient by check or wire transfer, such as fees paid, grants, donations, and sponsorship</li> </ul> <p>Or, where a payment is not directly made, such as:</p> <ul style="list-style-type: none"> <li>• The date the TOV took place, e.g. for an event an HCP participated in, their travel and accommodation</li> </ul> <p>We will disclose payments and TOV made by a 3<sup>rd</sup> Party Contractor in the reporting period within which the event occurred, provided the 3<sup>rd</sup> party has made payment to the HCP.</p>
Transfer of Value when a contract extends over several years	Where a contract with an HCP or HCO runs for a number of years, we would publish the actual payment made during the relevant reporting period.
Transfer of Value if the HCP does not attend or an event is cancelled	<p>We will only attribute any TOVs that are incurred and can be reasonably associated to the HCP.</p> <p>In the circumstances when a flight or accommodation is booked but the event is cancelled, or the HCP does not attend, no TOV will be attributed to that HCP.</p>
Cross-border Transfers of Value	<p>We collate all cross-border TOV to HCPs and HCOs.</p> <p>We report the transactions in the disclosure report for the country where the recipient has its principal practice in Europe.</p>
Currency	<p>All payments and TOV will be disclosed in the local currency of the CSL Seqirus reporting entity.</p> <p>If the original payment is made in another currency, it will be converted using the CSL Seqirus-approved exchange rate applicable at the time the payment or TOV was made.</p> <p>e.g. If CSL Seqirus USA makes a payment in USD to an HCP located in the UK, the payment amount will be converted to GBP for UK reporting.</p>

<b>Section 2: Managing Consent</b>	<ul style="list-style-type: none"> <li>How we manage the disclosure consent process for Healthcare Professionals (HCPs), and Other Relevant Decision Makers (ORDM)</li> </ul>
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<b>Consent action</b>	<b>CSL Seqirus decision</b>
Consent status	<p>CSL Seqirus made the decision in May 2023, that the company will adopt the principle of Legitimate Interests, asserting that full disclosure of interactions between the company and HCPs, and ORDMs is beneficial to the public, the healthcare sector, and the company. Therefore, post 15<sup>th</sup> May 2023 all financial arrangements between CSL Seqirus and HCPs or ORDMs will be published using the names of the individuals HCPs and ORDMs. Those transactions from 1<sup>st</sup> January 2023 until 14<sup>th</sup> May 2023 will be disclosed individually where consent has been obtained, any transactions without consent will be disclosed within the aggregate.</p>
Requests for data to be published in aggregate	<p>Post 15<sup>th</sup> May 2023, If an HCP or ORDM exercises their right to object, such objection would override CSL Seqirus’ legitimate interests and the published data would be amended to reflect that HCP’s or ORDM’s disclosure data in aggregate.</p>

Section 3: Managing report submission	<ul style="list-style-type: none"> <li>• How and where we report disclosure</li> </ul>
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Reporting action	CSL Seqirus decision
Disclosure method	CSL Seqirus will publish the disclosure report for any HCP, ORDM, or HCO located in the UK on the ABPI Disclosure portal – <a href="https://portal.disclosureuk.org.uk">https://portal.disclosureuk.org.uk</a>
Disclosure period	Each reporting period will cover a full calendar year, unless the local association sets a different period.
Retention period – public	The disclosure report will remain in the public domain for at least three (3) years.
Retention period – record-keeping	We will ensure that all the TOV required to be disclosed must be documented and retained for a minimum of five (5) years after the end of the relevant reporting period, unless a shorter period is required under applicable national data privacy or other laws or regulations.

Section 4: Categories for disclosure	<ul style="list-style-type: none"> <li>• Which types of payment of Transfer of Value are included in our disclosure report</li> </ul>
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Donations, grants, R&D, fees for service and consultancy

Description	Types of Transfer of Value involved
Donations and grants to HCOs	Donations and Grants to HCOs that support healthcare, including donations, grants, and benefits in kind, to institutions, organizations, or associations that: <ul style="list-style-type: none"> <li>• are comprised of HCPs</li> </ul> And/or <ul style="list-style-type: none"> <li>• provide healthcare service, professional guidelines, consensus statements, scientific meetings and patient support</li> </ul>
Fees for service and consultancy - Fees	TOV Resulting from or related to contracts between member companies and institutions, organizations, associations, or HCPs under which such institutions, organizations, associations or HCPs provide any type of services to CSL Seqirus, or any other type of funding not covered in the previous categories.  For example: <ul style="list-style-type: none"> <li>• Speaker fees</li> <li>• Speaker training</li> <li>• Data analysis</li> <li>• Development of educational materials</li> <li>• General consulting/advising</li> </ul>
Fees for service and consultancy <ul style="list-style-type: none"> <li>• Related expenses agreed in the fee for service of consultancy contract</li> </ul>	Related expense agreed in the fee for service or consultancy contract.  For example: <ul style="list-style-type: none"> <li>• Fees for airfare, train, boat, or ferry (including booking fees)</li> <li>• Car rental, care service, taxi transfers</li> <li>• Parking fees</li> <li>• Petrol</li> <li>• Tolls</li> </ul>
Research and development (Disclosed at an aggregate level)	Research and development TOV to HCPs/HCOs associated with: <ul style="list-style-type: none"> <li>• Non-clinical (good laboratory practice [GLP])</li> <li>• Clinical trials in Phase I to Phase IV</li> <li>• Investigator-sponsored studies</li> <li>• Non-interventional studies</li> </ul>

Donations, grants, R&D, fees for service and consultancy

Description	Types of Transfer of Value involved
Contribution to costs of events (as per HCP code): 1. Sponsorship agreements	Events include: <ul style="list-style-type: none"> <li>• All scientific professional meetings, congresses, conferences, symposia and other similar events</li> <li>• Sponsorships with HCOs/third party appointed by and HCO to manage and event</li> </ul> For example: <ul style="list-style-type: none"> <li>• Rental of booths at an event</li> <li>• Advertisement space (in paper, electronic, or other format)</li> <li>• Satellite symposia at a congress</li> <li>• Sponsoring of speakers/faculty</li> <li>• Drinks of meals provided by the organizers (where included in the Sponsorship Agreement)</li> <li>• Courses provided by and HCO (Where CSL Seqirus does not select the individual HCPs participating)</li> </ul>
Contribution to cost of events: 1. Registration fees	Registration fees related to attending a congress or symposia
Contribution to cost of events: 2. Travel and accommodation	Travel in relation to attending a congress or symposia Accommodation in relation to attending a congress or symposia For Example: <ul style="list-style-type: none"> <li>• Fees for airfare, train, boat, or ferry (including book fees)</li> <li>• Car rental, car service, taxi transfers</li> <li>• Parking fees</li> <li>• Petrol</li> <li>• Tolls</li> </ul>

Section 5:  
Definitions

- List of key terms

Term	Definition
Healthcare Professional (HCP)	<p>Any person that:</p> <ul style="list-style-type: none"> <li>Is a member of the medical, dental, pharmacy, or nursing professions</li> <li>While carrying out his or her professional activities, may prescribe, purchase, supply, recommend, or administer a medicinal product</li> <li>Works with their primary practice, principal professional address, or place of incorporation in Europe</li> </ul>
Healthcare Organization (HCO)	<p>(i) A healthcare, medical, or scientific association or organization (irrespective of the legal or organizational form) such as a hospital, clinic, foundation, university, or other teaching institution or learned society (except for patient organizations within the scope of the PO Code)</p> <p>(ii) With a business address, place of incorporation, or primary place of operation in Europe</p> <p>OR</p> <p>(iii) Through which one or more HCPs provide service</p>
Transfer of Value	<p>Direct and indirect TOV, whether in cash, in kind, or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of generic or branded prescription-only medicinal products exclusively for human use.</p> <p>Direct TOV are those made directly by CSL Seqirus for the benefit of a recipient</p> <p>Indirect TOV are those made by a third party on behalf of CSL Seqirus for the benefit of a recipient, for example travel or accommodation to an event organized by and external agency.</p>

Full definitions can be found in the ABPI Code of Practice for the Pharmaceutical Industry 2021, Clause 1.

<p>Section 6: Sources of further information</p>	<ul style="list-style-type: none"> <li>• Resources from EFPIA [Insert your local code if required]</li> <li>• Your local CSL Seqirus contact</li> </ul>
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**Resources from ABPI**

Support relating to the Disclosure Code is regularly updated on the website of The Association of the British Pharmaceutical Industry (ABPI):

- [www.abpi.org.uk](http://www.abpi.org.uk)

**How we can help at CSL Seqirus**

<p>For specific questions relating to this year’s report and process</p>	<ul style="list-style-type: none"> <li>• Contact your country’s transparency department Andrea Jenner (<a href="mailto:andrea.jenner@seqirus.com">andrea.jenner@seqirus.com</a>) or <a href="mailto:transparency.reporting@seqirus.com">transparency.reporting@seqirus.com</a></li> </ul>
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