

AbbVie Ltd Transparency Disclosure Methodological Notes for Reporting Year 2024

As a member company of EFPIA and ABPI, AbbVie Ltd is committed to ensure that the nature and scope of transfers of value (ToV) with healthcare professionals (HCPs), other relevant decision makers (ORDMs) and healthcare organisations (HCOs) are clear and transparent to the public. Therefore, AbbVie Ltd has published applicable ToV provided directly or indirectly to HCPs, ORDMs and HCOs for the 2024 calendar year.

This Methodological Note provides guidance on how AbbVie Ltd has recorded and publicly reported this information in accordance with the current edition of **ABPI Code of Practice**.

AbbVie completed the acquisition of ImmunoGen, Inc. on February 12, 2024. With the completion of the acquisition, ImmunoGen is now part of AbbVie. All AbbVie transparency reports will include ImmunoGen's reportable transactions.

Annual Disclosure of Contracted Services Provided by the Public, Including Patients and Journalists (ABPI Code of Practice Clause 30)

AbbVie Ltd publish annually details of the fees for certain contracted services paid to members of the UK public, including patients and journalists. These services include speaking at meetings, assistance with training, writing articles and/or publications, participating in advisory boards, advising on the design etc of clinical trials and participating in market research where such participation involves remuneration and/or travel.

The names of the individuals will not be disclosed. The disclosure will be made available on [AbbVie Ltd website](#) from 27th June 2024.

Reporting period / Reportable ToV:

The AbbVie Ltd 2024 disclosure includes applicable ToV during the period between 1st January 2024 and 31st December 2024.

Transactions processed after 10th January 2025 will be considered for the next report.

Transparency Acknowledgment from HCPs or HCOs:

Agreements between AbbVie Ltd and HCPs/HCOs relating to ToV may have included a Transparency section where HCPs and HCOs were notified of AbbVie's Transparency disclosure obligations.

Consent Approach:

As of 1st January 2024, AbbVie has adopted Legitimate interest as the legal basis for the disclosure of transfers of value to HCPs and ORDMs.

HCPs or HCOs and ORDMs, received correspondence explaining AbbVie's commitment to Transparency and the options and rights, they have in accordance with the data protection legislation.

Based on legitimate interests, AbbVie will publish the total value of the ToV for those HCPs that have not made an explicit and justified objection honoured by AbbVie for individual disclosure.

HCPs for which AbbVie honoured an objection will have their amounts included in an aggregate amount published per ABPI requirements. AbbVie's Privacy Notice at <https://www.abbvie.com/privacy.html> provides additional information on how AbbVie processes personal data and provides a description of the data privacy rights.

If an HCP would like to object to an individualised disclosure, he/she can do so in writing to AbbVie UK Transparency team at UK.Transparency@abbvie.com

Contract initiated in 2023

Several professional services agreements, with delivery dates set for 2024, were signed in 2023 based on "optional consent" as the legitimate basis for the disclosure. The ToV linked to these agreements will be disclosed at the individual level only if HCP or ORDM has given consent for such disclosure. For those who did not provide consent, the ToV will be disclosed in aggregate form.

Partial Consent - Contracts signed before 2024

AbbVie Ltd supports full disclosure. If only partial consent is given by an HCP/ORDM, all the ToV of this HCP/ORDM will be disclosed in aggregate.

Multiple Licensed HCPs:

HCPs with licenses authorising them to practice in more than one country, including United Kingdom, may have ToV disclosed in multiple country reports.

Non-Duplication:

Whenever possible, ToV are disclosed to the respective HCPs. If ToV is provided to the company of an HCP and the company has more than 2 HCPs, the ToV will be attributed to the company.

HCO Disclosure:

Where it has not been possible to identify an individual HCO or department within an organisation, the HCO will be reported at the highest organisational level.

HCP/HCO Number of Recipients Reported at an Aggregate Level:

Each category of ToV reported at an aggregate level includes the number of HCPs/HCOs provided with a ToV. Each HCP/HCO that received a ToV is counted as one recipient in each category.

Cross Border Interactions:

Reportable ToV provided by AbbVie affiliates (worldwide) to UK HCPs/HCOs have been included.

Sponsorship Payments made to more than one HCO:

In the case of sponsorship agreements where different HCOs have participated, it was assumed that each HCO received an equal share and was published for each HCO.

Pre-Disclosure:

HCPs and ORDMs to be disclosed on an individual basis were contacted during February 2025. They received correspondence containing the details of ToV to be reported according to ABPI requirements. AbbVie Ltd.'s intention was to provide an opportunity for HCPs and ORDM to verify and review the information for accuracy, prior to ABPI disclosure on 27th June 2025.

ToV Definitions:

HCPs and ORDM ToV Definition:

- Contracted Services: Fees
 - Speaking and chairing meetings
 - Advisory Boards and other consultancy engagements
 - Training services
 - Educational/Scientific Events

Note: Where AbbVie Ltd knows the identity of a market research participant (single blind market research), the fee(s) will be disclosed under this category.

- Contracted services: Expenses, such as:
 - Flights
 - Hotel
 - Other transportations costs (mileage, train, taxi, bus, underground, parking)

Note: Where incidental expenses are immaterial and unable to be disaggregated from the fees, said expenses will be disclosed under the Fee for Service and Consultancy Fees category.

- Contribution to Cost of Events: Registration Fees, Travel and Accommodation e.g., sponsorship for registration fees, travel, and accommodation, such as:
 - Congress/Meeting registration
 - Flights
 - Hotel
 - Other transportations costs (mileage, train, taxi, bus, underground, parking)

HCOs ToV Definition:

- Contracted Services: Fees, subject to applicable competition law rules with respect to the disclosure of competitively sensitive information, such as:
 - Speaking and chairing meetings
 - Advisory Boards and other consultancy engagements
 - Training with Services

- Educational/Scientific Events
- Provision of patient support programs
- Contracted services: Expenses, such as:
 - Flights
 - Hotel
 - Other transportations costs (mileage, train, taxi, bus, underground, parking)
- Contribution to Cost of Events: Sponsorship Agreements e.g., sponsorship for registration fees, travel, and accommodation, such as:
 - Congress/Meeting registration
 - Flights
 - Hotel
 - Other transportation costs (mileage, train, taxi, bus, underground, parking)
- Contribution to Cost of Events: Sponsorship Agreements with HCOs/third parties appointed by HCOs to manage an event, such as part funded independent education events.
 - When sponsorship also included catering costs and any other forms of funding (e.g., logistical costs) as part of a sponsorship package, these are disclosed as a ToV (sponsorship).
 - Where indirect sponsorship of a HCP occurs through an HCO, the ToV will be disclosed in the name of the recipient HCO.
 - Where a professional conference organiser (PCO) is collaborating with a HCO in the organisation of the event, the ToV will be disclosed under the recipient HCO.
 - Where the HCO hasn't been set up as a legal entity, the TOV will be disclosed under the PCO's name with indication of the Specialty Area. Where a PCO is organising an event (via AbbVie provided sponsorship) on behalf of more than one HCO, then the ToV will be disclosed in the name of each recipient HCO.

Donations and Grants:

Provision of funds, benefits-in-kind or services freely given for the purpose of supporting healthcare, scientific research, or education with no consequent obligation on the recipient organisation, institution, and the like to provide goods or services to the benefit of AbbVie Ltd.

Collaborative Working – which includes Joint Working:

AbbVie engagement with other organisations in delivering initiatives which enhance patient care, for the benefit of patients or the National Health Service (NHS), to help with maintaining patient care.

Date Methodology:

AbbVie Ltd followed the date methodology when determining which ToV are in scope for current reporting cycle:

- **Event Date** is defined as the date the expense occurred. ToV related to the following categories will use the Event Date when determining applicability for current year reporting requirements (e.g., did the event occur within the reporting period 1st January 2024 to 31st December 2024).
 - Fee for Service and Consultancy: Expenses
 - Contribution to Cost of Events: Registration Fees
 - Contribution to Cost of Events: Travel and Accommodation

- **Paid Date** is defined as the date the payment was provided to the covered recipient. ToV related to the following categories use the Paid Date when determining applicability for current year reporting requirements (e.g., did the payment occur within the reporting period 1st January 2024 to 31st December 2024).
 - Contracted services: Fees
 - Contribution to Cost of Events: Sponsorship Agreements
 - Grants and Donations, Collaborative Working
 - Research and Development

Out of Scope:

Meals, drinks, samples, promotional aids, and items for patient support (all as defined by Clauses 1.25 and 26.3 of the 2024 ABPI Code) are out of scope.

Value Added Tax (VAT):

Where applicable, disclosure of payments does not include VAT. Cross border ToV may or may not include VAT depending on the submitting source.

Social Benefits:

Where applicable, disclosure of payments does not include Social Benefits.

Withholding Taxes:

Where applicable, for services provided in locations outside of United Kingdom, ToV amounts will be reported as in the contract agreement.

Currency:

All information is reported in Pound Sterling (GBP).

Exchange Rate:

Where ToV were captured in foreign currency, amounts were converted to local currency based on AbbVie Ltd Treasury Monthly Average Rates.

Rounding:

For each HCP/ORDM/HCO, ToV for each reporting category is rounded to the nearest Pound Sterling (GBP). The Total Amount for each HCP/HCO represents the sum of the reporting category amounts.

Multiyear Contracts:

Activities with ToV, crossing calendar years may have the contracted full amount disclosed using the date of last payment.

Research and Development:

For the purpose of disclosure, Research and Development (R&D) ToVs are ToVs to HCPs or HCOs related to the planning or conduct of:

- non-clinical studies
- clinical trials
- non-interventional studies that are prospective in nature and involve the collection of data from, or on behalf of, individual or groups of HCPs specifically for the study.

The total aggregate disclosure includes ToV made by AbbVie Ltd to HCPs/HCOs, as well as those made by its parent company, subsidiaries, and joint ventures (as required by the partner agreement).

Clinical trials with retrospective elements, including ToV direct or indirect to HCPs/HCOs, have been disclosed at an individual level as a fee for service.

Biological samples and investigational compounds will be excluded from R&D disclosures. These compounds are subject to provisions under the Clinical Trial Directive (their use is submitted in the clinical trial approval process).

Lending of laboratory equipment that is used exclusively for conducting a study and will be returned to AbbVie at the end of the study will not be disclosed in the R&D aggregate amount.

Post Publication Disputes:

AbbVie will review and investigate disputes with HCPs/HCOs relative to our Transparency reports. Any changes resulting from this review will be published in an updated report.