

Methodology Note for Activity

1. Purpose

The relationship between the pharmaceutical industry and healthcare professionals (HCPs) and healthcare organizations (HCOs) plays a vital role in the development and delivery of life-enhancing and life-saving medicines. It is a relationship that we at GW Pharmaceuticals are proud of. At the core of the relationship is sharing knowledge to improve outcomes for patients. We want to ensure that patients and others have confidence that this relationship is open and transparent, which is why the pharmaceutical industry is taking the lead on disclosing details of payments and other benefits in kind made by industry to HCPs and HCOs.

The ABPI (Association of the British Pharmaceutical Industry's) code also requires member companies to publish a note summarizing the method used by the company in preparing its Disclosure Report and identifying transfers of value for each category of spend relating to HCPs and HCOs ("Methodology Note"). This document represents GW Pharmaceuticals Methodology Note for the reporting period 1st January 2021 to December 2021.

This methodological Note is intended to assist the reader understand the method taken used to report transparency data.

2. Approach to Disclosure

GW is committed to making the transfers of value made to HCPs and HCOs transparent. In making them transparent all reasonable efforts will go into making sure they are accurate, valid and complete.

GW complies with all laws, rules and regulations. Laws in the EU protect the rights of citizens in relation to the way their personal data is processed. HCPs are covered by Data Privacy laws and this affects the way in which GW can publish the HCP's transfers of value. GW must seek permission (consent) from the HCP or have other legal reasons to individually publish their transfers of value. Equally, confidentiality clauses within contracts with HCOs may prohibit GW from disclosing the transfer of value.

Where GW has been unable to obtain consent from an HCP that is fully compliant with General Data Protection Regulation (GDPR), or other legal reasons prevent GW from disclosing individually for an HCP or HCO, their transfers of values have been added to an aggregate figure within the Disclosure Report. Please see the Reportable transfers of value to HCPs/ HCOs section within this Methodology Note for more information.

3. Definitions

HCP:

The term health 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.

HCO:

The term healthcare organization means either a healthcare, medical or scientific association or organization 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 UK.

Reportable Transfers of Value (ToVs)

Fees for Service and Consultancy:

GW engages HCP/HCOs for services when there is a genuine and legitimate business need and where the HCP/HCO is qualified and appropriate to provide the services. These services are paid with a Fee for Service at Fair Market Value.

These services can include:

- Speaker
- Training services
- Advisory board meetings
- Medical writing
- Data analysis
- Development of education materials
- General consulting/advising
- Congress
- Retrospective Non-interventional studies
- Participation in market research where such participation involves remuneration and/or travel. Payments for these services are only disclosed if GW is aware of the identity of those participating in the market research.

Donation and Grants:

GW provides support to medical or scientific education, advances in medical or scientific research, health or healthcare systems or disaster relief through financial or non-financial ToVs to legitimate, established organizations. Donations to HCOs can be both monetary and donations in kind.

Sponsorship Agreements:

GW gives contributions, through financial or non-financial support to legitimate, established organizations for medical or scientific education of external stakeholders, organizing or hosting educational or scientific events (including independent congresses).

Registration Fees:

As part of support to continuous medical education, GW provides support to HCOs or HCPs to cover the costs of registration fees for HCPs to attend selected independent congresses and where provided to HCOs, also for other educational/scientific events.

Travel and Accommodation:

As part of support to continuous medical education, GW provides support to HCOs or HCPs to cover the costs for Travel and Accommodation for HCPs to attend selected independent congresses and/or GW organized meetings and where provided to HCOs for other educational/scientific events.

Research and Development:

All ToVs related to the planning or conduct of non-clinical studies, clinical trials and non-interventional studies performed by GW or by Clinical Research Organizations on GW's behalf that are prospective in nature are considered Research & Development ToVs.

4. Inclusion and Criteria for Payments Disclosure

A Disclosure Report covers transfers of value from the 1st January – 31st December of the year of the report. The date that GW internal accounting system records the payment having been made will determine which annual Disclosure Report it is included in.

The natural or legal person that holds the bank account on which the money is transferred is considered the recipient of the ToV and will be disclosed. Where a project requires transfers of value to be made in several instalments, the date that the internal accounting system records the payment as having been made will determine within which Disclosure Report the transfer is contained. This may mean that a transfer of value recorded in a Disclosure Report may be a part-payment, with other payments relating to the project being reported in other annual Disclosure Reports.

Indirect Payments:

GW may contract with agencies that go on to make transfers of value to HCOs/HCPs. The end recipient (HCP/HCO) may not appear within GW accounting tool. GW makes the best effort to ensure that these transfers of value made on our behalf are captured and reported as if they were made directly by requesting information from our agencies.

Cross-Border Activates:

GW employees are required to capture and report all ToVs to HCPs and HCOs with their primary practice in a country with EFPIA Disclosure Code and/or other cross border transparency reporting requirements. The country of disclosure will be determined by the address of principal practice for HCPs and the address of registration for an HCO.

Financial Data:

Disclosure will be made in British Pounds. For ToVs made in foreign currencies the conversion was made at the time of payment using the GW Pharmaceuticals exchange rate applicable at the time.

VAT is not included in the ToVs included in this report.

6. Consent Management

HCP Consent:

All efforts have been made to achieve a high level of individual HCP payment disclosure whilst recognizing the rights afforded to individuals under the General Data Protection Regulations (GDPR).. Therefore, consent has been sought from all individual HCPs to disclose individual ToVs. Where individuals have not consented or have withdrawn consent this data is reported in aggregate.

Where an individual HCP does not consent to disclose all payments made for the full calendar year GW has disclosed all data for that individual in aggregate. This is so as to ensure figures reported for individuals are not misleading.

For data protection enquiries on our ToVs please contact:

i-care@gwpharm.com

For media enquiries please contact:

publicrelations@gwpharm.com