

**Reporting of Transfers of Value to HCPs and HCOs
Methodological Note for Reporting of 2022 Data in 2023**

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1. Introduction

Alexion is a member company of the Association of British Pharmaceutical Industry (ABPI). The ABPI code requires disclosures of all Transfers of value made to healthcare professionals (HCPs), other relevant decision makers (ORDMs) and healthcare organisations (HCOs) each annum. This note discloses the methodologies used by Alexion in preparing disclosures in compliance with ABPI Code of Practice.

Commitment to transparency: The pharmaceutical industry is committed to preserving the integrity of Disclosure UK and transparency in our interactions with HCPs, ORDMs and HCOs.

2. Definitions

2.1. Recipients

2.1.1 Definition of an 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.

Disclosure will also apply to 'other relevant decision makers' (ORDMs), this 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.

2.1.2 Definition of an HCO

The definition of an HCO in United Kingdom of Great Britain & Northern Ireland is:

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 Europe or an organisation through which one or more health professionals or ORDMs provide services.

Patient Organisations are not considered to be HCOs and are separately included in the Patient Organisation report.

3. Transfer of Values (ToVs)

- Registration fee: registration of HCP or ORDM to attend an educational event. Where

registration is required for the provision of a service, these are disclosed in the category 'Related expenses agreed in the fee for service or consulting contract'. Where there is no provision of services they are disclosed in the category 'Registration'.

- Travel/accommodation: where travel or accommodation is required for the provision of a service, these are disclosed in the category 'Related expenses agreed in the fee for service or consulting contract'. Where there is no provision of services they are disclosed in the category 'Travel and accommodation'.
- Fees: Transfers of Value paid to HCP or ORDM to provide services to Alexion.
- R&D: Any payment related to the transfer of value for Research and Development to UK HCPs or HCOs is declared as an aggregate and not individually

4. Date of ToVs

Where the ToV is a payment, values are reported on the date of the payment. Payments made in 2022 for activities related to 2021 are included. If consent to disclose these has been obtained, they are reported against the individual. If not, they are reported in aggregate.

Where a transfer of value is made to a healthcare professional indirectly via a healthcare organisation, Alexion will disclose the value the transfer in the name of the healthcare professional as recommended by Clause 10.10 of the ABPI code.

Where a contract for any Transfer of Value runs for more than one year, Alexion will disclose any Transfer of Value relating to the contract in the year that Transfer of Value was made.

5. Disclosure financial data

5.1 Currency

All Transfers of Value to UK HCPs and ORDMs are disclosed in British Pounds (GBP). Where Transfers of Values are made in another currency, the value of the transfer will be converted into GBP using the exchange rate on the date the transfer was made. Amounts disclosed in GBP may therefore vary slightly from the exact amount paid in the local currency.

5.2 Value Added Tax (VAT) and other taxes

Alexion discloses the exact amount paid to the HCP, ORDM or HCO. This may include VAT, if included on the invoice. All Transfers of Value made to a UK HCP/ORDM/HCO by

Alexion, irrespective of where the Alexion entity is located are included in this disclosure report.

6. Specific considerations

6.1 Self-Incorporated HCP

Where an HCP has set up their own company and they are the sole owner and Alexion has made payments to that company for Services provided by the HCP, the ToVs have been disclosed against that individual HCP.

7. Consent management

7.1 Consent collection

7.1.1 HCO consent

In United Kingdom of Great Britain & Northern Ireland HCOs are reported without the need for consent as they are legal entities.

7.1.2 HCP consent

All efforts have been made at achieve a high level of individual HCP payment disclosure whilst recognising the UK Data Act and the General Data Protection Regulation (GDPR).

For the purpose of complying with transparency obligations relating to Transfers of Value in the United Kingdom, including disclosures against the Consultant's name and principal practice address on the ABPI's Disclosure Portal, Alexion relies on *legitimate interests* as its grounds for processing Personal Data. Since February 2020 this has been laid out in Appendix 1 of all HCP Service Agreements as part of our Fair Processing Notice.

7.2 Management of recipient consent withdrawal

The process is detailed below. Where HCPs exercise their right under the Data Protection Act or under the General Data Protection Regulation (GDPR) to object to individual disclosure, those ToVs are reported in aggregate.

As part of Alexion's pre-disclosure process, HCPs have an opportunity to verify and/or object to individual disclosure via the Alexion Pre-Disclosure Portal. Therefore, if an HCP objects the payment details will subsequently be included in the aggregate spend.

For 2022, we have two records of HCPs/ORDMs who have not provided consent for individual disclosure. The transfer of value relating to these HCPs/ORDMs has been reported as an aggregate value.

7.3 Management of recipient's requests

As the UK disclosure data will be hosted on the ABPI central platform, HCPs/HCOs or ORDMs should in the first case raise queries or requests with the ABPI data Partner. If data queried by an HCP/ORDM has already been published on the public search, it will be immediately suppressed in the system and will disappear from publication until the query is resolved. HCP/ORDMs will continue to see the queried data within their private Disclosure Portal even if it is under query. Any data queried by HCOs will remain published.

7.4 Partial consent

Alexion UK will not report partial transactions. All spend will be reported at the individual level or in the aggregate.

8 Disclosure form

8.1 Disclosure platform

8.1.1 Date of publication

The date of publication for United Kingdom of Great Britain & Northern Ireland is 30 June 2022 in line with the ABPI Code of Practice for the Pharmaceutical Industry.

8.1.2 Retention of data

Alexion UK maintains relevant records of the disclosures for a minimum of 5 years.

8.2 Disclosure language

Disclosure is made in English

9 HCO Executive Summary 2022

This has been captured here in this document on the page which follows.

<p>University College Hospital, Institute for Live & Digestive Health, UCL Division of Medicine</p>	<p>This payment of £2100 was for a sponsorship of the Royal Free Sheila Shelrock Virtual Hepatology Postgraduate Course held on 16-18 March 2022 from the Royal Free Campus, London. The organisers were solely responsible for setting the agenda of the event. In return Alexion received attendance for six employees at the event, a company short video displayed during course, company slides displayed during course, Alexion logo on digital platform and recognition of sponsorship level in the programme.</p>
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<p>Newcastle Upon Tyne Hospitals NHS Trust-Royal Victoria Infirmary</p>	<ol style="list-style-type: none"> 1. This payment of £10,000 was for the sponsorship of National Renal Complement Therapeutics Centre (NRCTC) Patient Roadshow arranged by the Newcastle upon Tyne NHS Foundation Trust held on the 12th November 2022. The organiser's were solely responsible for setting the agenda of the event. The benefit the company received in return is attendance of one alexion employee at the event and declaration of Alexion sponsorship on the agenda. 2. This payment of £4,500 was for the sponsorship of NRCTC Patient Roadshow arranged by the Newcastle upon Tyne NHS Foundation Trust, which was held on 21st May 2022. The organisers were solely responsible for the setting of the agenda. The benefit the Company received in return is attendance of two Alexion employees at the event.
<p>University of Sheffield</p>	<p>This payment of £480 was for the sponsorship of the 11th Annual Mellanby Centre Research Meeting held on 25th March 2022. The organisers were solely responsible for setting the agenda of the event. The benefit the company received in return is attendance of four Alexion employees to the meeting and the opportunity to disseminate Alexion materials.</p>
<p>Oxford University Hospital</p>	<p>This payment of £500 was for the Sponsorship of NSSG Update on Aspects of Non-Malignant Haematology Meeting held on the 23rd May 2022. The organisers were solely responsible for setting the agenda of the event. The benefit the company received was an opportunity for exhibition space and an opportunity to disseminate Alexion materials.</p>
<p>Royal Berkshire NHS Foundation</p>	<p>This payment of £1500 was for the Sponsorship of the Royal Berkshire Hospital Renal Unit & Oxford Kidney Unit meeting held on 7th July 2022. The organisers were solely responsible for setting the agenda of the event. The benefit the company received was an opportunity for exhibition space and an opportunity to disseminate Alexion materials.</p>
<p>University Hospital, Southampton</p>	<p>This payment of £500 was for the Sponsorship for the 14th annual Nephro-Urology Study day held on the 2nd February 2022. The organisers were solely responsible for setting the agenda of the event. The benefit the company received was an opportunity to disseminate virtually Alexion materials via a presentation.</p>

Oliver Plunkett Postgraduate	This payment of £200 was for the Sponsorship for Haematology Grand Round Meeting held on the 24 th March 2022. The organisers were solely responsible for setting the agenda of the event. The benefit the company received was an opportunity to present on Alexion product data.
The Royal Wolverhampton NHS	This payment of £875 was for the Sponsorship for the 19 th annual Post ASH update Educational Seminar held on the 20 th May 2022. The organisers were solely responsible for setting the agenda of the event. The benefit the company received at the event were the provision of a stand and the sponsorship details on the agenda and during the introductory presentation.
University of Edinburgh	This payment of £750 was for the Sponsorship of the Scientific Symposium of Bone and Joint Disease held on the 18 th February 2022. The benefit the company receive was the opportunity to deliver a presentation relating to an Alexion disease area, diagnosis and treatment virtually.
Glasgow Children's Hospital	This payment of £500 was for the sponsorship of an externally organised (by the Office for Rare Conditions) Rare Bone Webinar, taking place on Rare Disease Day, Monday Feb 28 th 2022. The organisers were solely responsible for setting the agenda. The benefit the company received at the event were two delegate passes for Alexion employees to attend the event, content of a talk by one of the speakers on a disease area relevant to Alexion, diagnosis and treatment, alexion employee contact details to be shown on a holding slide, and introduction by the chair as a contact for an disease area of relevance to Alexion.
Medics4Rare Diseases	This payment of £20000 was for the sponsorship and partner organisation of Medics4RareDisease in 2022, supporting their efforts to provide education and practical tools targeted at medical professionals, and enabling them to reduce the diagnostic odyssey and improve patient experience. The benefit the company received was a spot for company logo on the Medics4RareDisease website, consultation about medical education, lunch & learn sessions, providing speakers for Alexion events, access to online educations resource and educational guest blog post on their website.
	For the calendar year 2022 Alexion paid Nova Healthcare a sum of £4270 and £4880.

<p>Nova Healthcare</p>	<p>Nova Healthcare was requested to work collaboratively with the PNH team at Leeds Teaching Hospitals NHS Trust to facilitate the implementation of a new treatment regimen for NHS patients currently receiving treatment within the Oncology CSU in Bexley Wing, St James Hospital, Leeds, United Kingdom</p> <p>To support a successful introduction of an Alexion treatment, the Leeds PNH team have requested the following services from Nova Healthcare:</p> <ul style="list-style-type: none"> - Reception service to greet patients - Provision of consulting rooms for use by Leeds PNH consultant (s) to complete the consenting process with patients - Administrative support - Treatment area/chair for each patient - Pre and post-treatment nursing care for each patient in collaboration with Leeds PNH team - Nursing support for each patient for duration of treatment (infusion service) - Provision of pumps and additional equipment/consumables required for delivery of prescribed treatment
<p>King College London</p>	<p>This payment of £1200 was for the sponsorship of the Guys Hospital Kidney Transplantation Course held on 1st and 2nd December 2022. The organiser's were solely responsible for setting the agenda. The benefit the company received were logos on materials as a sponsor and attendance of a maximum of four Alexion employees at the event.</p>
<p>Children's Cancer and Leukaemia Group</p>	<p>This payment of £500 was for the sponsorship of the CCLG meeting held on 10th October 2022. The organiser's were solely responsible for setting the agenda. The benefit the company received were attendance to the CCLG meeting by Alexion delegates and the opportunity to interact with delegates to raise awareness of a disease area.</p>

<p>HEMOCARE PROVIDERS:</p> <p>Sciensus Pharma Services Ltd</p> <p>Lloyds Pharmacy Clinical Homecare</p> <p>Alcura Health</p>	<p>These are the three homecare providers in the UK who Alexion contract with to provide a comprehensive managed homecare service to patients.</p>
<p>GRANTS:</p> <p>Touch Independent Medical Education</p> <p>Medshr Limited</p> <p>Medscape Education Global Limited (three separate activities)</p> <p>EPG Communications Limited</p> <p>Society for Mucopolysaccharide</p>	<p>These relates to the grant which were paid in the year 2022 to UK base Organisations. All Transfers of Value to UK HCOs are disclosed in GBP. Where Transfers of Values are made in another currency, the amount will be converted into GBP using the Oanda currency converter online tool and conversion will be using the exchange rate on the date the transfer was made. reflecting the currency conversation at the time of the payment date. Amounts disclosed in GBP may therefore vary slightly from the exact amount paid in the local currency.</p> <p>Touch Independent Medical Education</p> <ul style="list-style-type: none"> - Alexion funded, via grant to Touch Independent Medical Education Limited an amount of 97060.3 GBP in one lump sum in co-support to develop and distribute an online, enduring, accredited touchEXPERT OPINIONS activity, covering diagnosis and management of cold agglutinin disease. <p>Medshr Limited</p> <ul style="list-style-type: none"> - Alexion funded, via grant to Medshr Limited an amount of 146,567 GBP for Ahus educational programme delivered via MedShr’s app and platform through peer-to peer- case discussion platform. <p>Medscape Education Global Limited</p> <ul style="list-style-type: none"> - Alexion funded, via a grant, to Medscape Education Global Limited an amount of 351237 GBP, 336511

	<p>GBP, and 418099 GBP as three lump sums. These grants all relate to an all-encompassing educational curriculum for Wilson Disease.</p> <p>EPG Communications Limited</p> <ul style="list-style-type: none">- Alexion funded, via a grant, to EPG Communications Limited an amount of 23345.00 GBP. The grant was to support congress highlight articles based on the international symposium of Amyloidosis (ISA) held 4-8th Sept 2022, with supporting video clips. <p>Society for Mucopolysaccharide</p> <ul style="list-style-type: none">- Alexion funded, via grant to Society for Mucopolysaccharide Diseases an amount of 35,800.00 GBP in one lump sum whereby the MPS Society in collaboration with the Royal Manchester Children's Hospital will undertake evidence collection, analysis, and reporting to support too NICE for the HST evaluation for an Alexion Product. The MPS Society outsourced certain activities to Rare Disease Research Partners to complete.
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