

**Reporting of Transfers of Value to HCPs and HCOs
Methodological Note for Reporting of 2023 Data in 2024**

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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 2023 for activities related to 2022 are included.

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 to 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 2023, 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 2023 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>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 3rd-4th November 2022. The organisers were solely responsible for setting the agenda of the event. The benefit the company received in return is attendance of two Alexion employees at the event and declaration of Alexion sponsorship on the agenda. 2. This payment of £10,000 was for the sponsorship of NRCTC Patient Roadshow arranged by the Newcastle upon Tyne NHS Foundation Trust, which was held on 13th May 2022. The organisers were solely responsible for the setting of the agenda. The
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	benefit the Company received in return is attendance of two Alexion employees at the event and declaration of Alexion sponsorship on the agenda.
Nottingham University Hospital	<ol style="list-style-type: none"> 1. This payment of £1200 was for the sponsorship of CYPICS Clinical Network/Governance Education Day arranged by the Nottingham University Hospital NHS Trust held on the 14th March 2023. The organisers were solely responsible for setting the agenda of the event. The benefit the company received in return is banner stand space, two event registration. 15minute speaker session, Alexion logo placement, and the opportunity to interact with delegates. 2. This payment of £3696 was for the participation of an employee of the hospital at an Alexion advisory board and act in the capacity of an advisor.
Glasgow Children's Hospital	This payment of £2500 was for the sponsorship of an externally organised (by the Office for Rare Conditions) Neurofibromatosis Webinar held on 25 th October 2023 virtually. The organisers were solely responsible for setting the agenda. The benefit the company received at the event were four delegate passes for Alexion employees to attend the event and the Alexion logo on slides presented at the event.
Chelsea and Westminster Hospital	<ol style="list-style-type: none"> 1. This payment of £580 was for the participation of an employee of the hospital to speak at an internal Alexion meeting on AI. 2. The payment fee for contracted services of £6000 was for the phase 1 disease search creation for PNH project.
University Hospital Southampton NHS	This payment of £1500 was for the sponsorship of the PIER conference held on 10 th -11 th October 2023 arranged by the University Hospital Southampton NHS Foundation Trust. The organisers were solely responsible for setting the agenda of the event. The benefit the company received in return is attendance of two Alexion employees at the event, banner stand space, logo placement on in person event materials, 2 workshop sessions and opportunity to interact.
University College London	This payment of £2100 was for the sponsorship of the Royal Free Sheila Shelrock Virtual Hepatology Postgraduate Course held on 8 th -10 th March 2023 arranged by the University Hospital Southampton NHS Foundation Trust. The organisers were solely responsible for setting the agenda of the event. The benefit the company received in return is attendance of six Alexion

	employees at the event, company video displayed, and recognition of Alexion on digital platform.
Medics 4 Rare Diseases	<p>1.This payment of £30000 was for the sponsorship and partner organisation of Medics4RareDiseases, 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 Medics4RareDiseases 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.</p> <p>2. The payment fee for contracted services of £940 were for Medics4RareDiseases to present, and participate in an Alexion roundtable session pertaining to diagnosis in rare diseases.</p>
Cardiff and Vale University Health Board	<p>1.This payment of £1000 was for the sponsorship of the annual meeting of the Welsh Association of Renal Physicians & Surgeons (WARPs) held on 23rd June 2023. The benefit the company received included attendance for Alexion employees at the meeting, opportunities to engage and acknowledgement of Alexion as a sponsor.</p>
CFS Events Ltd	<p>This payment of £7800 was for the sponsorship of the British Association of Perinatal Medicine 2023 held on 11-12 September. The organisers were solely responsible for setting the agenda. The benefit the company received included a symposium at the programme, option of sending a pre-conference marketing email, exhibition space, attendance of Alexion employees to the event, inclusion of a company logo, delegate list, premium listing on BAPM website, company profile feature and declaration of sponsorship.</p>
Childrens Cancer & Leukaemia Group	<p>1.This payment of £1000 was for the sponsorship of the CCLG meeting held on 5th July 2023. The organisers were solely responsible for setting the agenda. The benefit the company received included attendance to the CCLG meeting by Alexion delegates, banner space stand, symposium slot, logo placement, and the opportunity to interact with delegates to raise awareness of a disease area.</p> <p>2.This payment of £3300 was for the sponsorship of the</p>

	<p>CCLG meeting held on 20th-21st March 2023. The organisers were solely responsible for setting the agenda. The benefit the company received included attendance to the CCLG meeting by Alexion delegates, exhibition space, presentation slot, logo placement, and the opportunity to interact with delegates to raise awareness of a disease area.</p>
Clinical Genetics Society	<p>This payment of £1500 was for the sponsorship of the CGS meeting held on 21st March 2023. The organisers were solely responsible for setting the agenda. The benefit the company received, included 2 exhibitor passes, exhibition space, company logo, opportunity to interact with delegates to raise awareness of a disease area and product.</p>
Liverpool University Hospital	<p>This payment of £500 was for the sponsorship of the TTP health psychology day on 3rd October 2023. The organisers were solely responsible for setting the agenda. The benefit the company received included 1 Alexion employee in attendance and the opportunity to discuss disease area related patient pathway.</p>
Neurology Academy	<p>1.The payment of £26239.86 was for the sponsorship of the Myasthenia Masterclass held on 20/21st March 2024. The Organisers were solely responsible for setting the agenda of the event. The benefit the company received included attendance of Alexion employees at the event in person/or virtually and access to meeting content post-event, delegate lists, display of company logos and physical/virtual delegate bag with company branding.</p> <p>2.The payment of £13104 was for the sponsorship of the Myasthenia Gravis Nurse Network Meeting held on 12th October 2023. The Organisers were solely responsible for setting the agenda of the event. The benefit the company received included attendance of 1 Alexion employee as an observer at the roundtable, delegate lists, written report, display of company logos on materials.</p> <p>3.The payment of £25239.86 was for the sponsorship of the Neuropharmacy Masterclass held on 17th November 2023. The Organisers were solely responsible for setting the agenda of the event. The benefit the company received included attendance of Alexion employees and</p>

	access to meeting content post-event, and delegate lists.
British Paediatric Neurology Association	This payment of £6000 was for the sponsorship of the BPNA conference held on 24 th -26 th January 2024. The organisers were solely responsible for setting the agenda. The benefit the company received included 2 exhibitor passes and session registrations, banner stand space, company logo and profile on materials materials as appropriate.
British Society for Paediatric	This payment of £10500 was for the sponsorship of the BSPED conference held 8 th -10 th November 2023. The organisers were solely responsible for setting the agenda. The benefit the company received included 5 delegate registrations, exhibition space, sponsor recognition, holding slides, delegate bag inserts and profile and advert in program book.
Royal College of Obstetricians and Gynaecologists	The payment fee of £8400 was for upload of an educational video provided by Alexion to the RCOG eLearning platform for 12 months and feedback link on the resource, and 2 RCOG O&G newsletter placements to promote Alexion resource.
Kings College London	This payment of £5000 was the complement UK training course and symposium.
NHS Greater Glasgow & Clyde	This payment of £9450 related to a LAL-Deficiency diagnostics project. This payment of £1140 was for a 2-day training event,
European Society of Endocrinology	This payment of £33000 was for the sponsorship of the 25 th European Congress of Endocrinology 2023.
<p>HEMECARE PROVIDERS:</p> <p>Sciensus Pharma Services Ltd</p> <p>Lloyds Pharmacy Clinical Homecare</p> <p>Alcura Health</p>	These are the three homecare providers in the UK who Alexion contract with to provide a comprehensive managed homecare service to patients.
GRANTS:	These relates to the grant which were paid in the year 2023 to UK based 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, using the exchange rate on the date the transfer was made. Amounts disclosed in GBP may

<p>Touch Independent Medical Education (2 separate activities)</p> <p>Medscape Education Global Limited (three separate activities)</p>	<p>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 a grant to Touch Independent Medical Education Limited an amount of 302321 GBP and 136343 GBP for a touch Satellite symposium and touch panel discussion relating to the neurology therapy area. <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 155407 GBP, 278813 GBP, and 255086 GBP for activities relating to Wilson’s disease. NF-1 and liver transplant.
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