

**Reporting of Transfers of Value to HCPs and HCOs  
Methodological Note for Reporting of 2024 Data in 2025**

## Contents

1. Introduction .....	3
2. Definitions .....	3
2.1. Recipients .....	3
2.1.1 Definition of an HCP .....	3
2.1.2 Definition of an HCO .....	3
3. Transfer of Values (ToVs) .....	3
4. Date of ToVs .....	4
5. Disclosure financial data .....	4
5.1 Currency .....	4
5.2 Value Added Tax (VAT) and other taxes .....	4
6. Specific considerations .....	5
6.1 Self-Incorporated HCP .....	5
7. Consent management .....	5
7.1 Consent collection .....	5
7.1.1 HCO consent .....	5
7.1.2 HCP consent .....	5
7.2 Management of recipient consent withdrawal .....	5
7.3 Management of recipient's requests .....	6
7.4 Partial consent .....	6
8. Disclosure form .....	6
8.1 Disclosure platform .....	6
8.1.1 Date of publication .....	6
8.1.2 Retention of data .....	6
8.2 Disclosure language .....	6

## 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 2024 for activities related to 2023 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 10.11 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 2024, we have one record of HCP/ORDM who has not provided consent for individual disclosure. The transfer of value relating to this HCP/ORDM 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 27 June 2025 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.