

Idorsia Pharmaceuticals UK Ltd
ABPI Disclosure: United Kingdom
Methodology Note Applicable to Transfers of Value

Disclosure Period: Calendar year 2022

INTRODUCTION

In order to ensure confidence in the pharmaceutical industry, transparency surrounding the industry's relationship with healthcare providers (HCPs), other relevant decision makers (ORDMs), healthcare organisations (HCOs), patient organisations and other members of the public (including patients and journalists) is fundamental. Therefore, the European Federation of Pharmaceutical Industries and Associations (EFPIA) Code of Practice 2019 places a requirement on all pharmaceutical companies to publicly disclose certain transfers of value (ToV) made directly or indirectly to HCPs, ORDMs, HCOs and Patient Organisations located in Europe on an annual basis. The Association of the British Pharmaceutical Industry (ABPI) Code of Practice 2021 has incorporated these requirements for pharmaceutical companies in the UK.

Idorsia Pharmaceuticals UK Ltd (Idorsia UK) is committed to transparency regarding our business operations and relationships with HCPs, ORDMs, HCOs, patient organisations and members of the public (including patients and journalists). Sharing information about these relationships will improve the public's confidence and understanding that these relationships are for the purpose of better patient management.

The Idorsia UK's 2022 ToV disclosure report for HCPs, ORDMs and HCOs is disclosed on the ABPI database, Disclosure UK.

The purpose of this methodological note is to serve as accompanying documentation to the Idorsia UK 2022 Disclosure Report for HCPs, ORDMs and HCOs. This document will allow external recipients to benefit from an informed reading of the report by understanding how the data has been collected and is reported. According to the instruction from the ABPI Code of Practice 2021, this note is published together with the annual report of ToVs.

The ABPI Code of Practice 2021 also requires companies to publicly disclose certain details relating to patient organisations that have been provided with donations, grants, sponsorships or that have provided contracted services. Furthermore, a public disclosure must also be made for certain contracted services and expenses paid to members of the public. The 2022 ToV disclosures for Patient Organisations and members of the public can be found on the Idorsia UK company website from the end of June 2023.

DEFINITIONS

Idorsia UK has adopted the definitions below as per the relevant Clauses of the ABPI Code of Practice 2021.

HEALTHCARE PROFESSIONAL (HCP, Clause 1.9)

Includes any member of the medical, dental, pharmacy or nursing profession and any other person who in the course of their professional activities may administer, prescribe, purchase, recommend or supply a medicine.

Transfers of Value made to Allied HCPs, including Psychologists will also be disclosed in the Idorsia UK report.

The Idorsia UK report will be based and dependant on reference data stored in Idorsia

systems.

HEALTHCARE ORGANISATION (HCO, Clause 1.8)

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 other relevant decision makers provide services.

If a healthcare organisation consists of only one health professional or other relevant decision maker, then it would be subject to the requirements in the Code regarding individual health professionals.

OTHER RELEVANT DECISION MAKER (ORDM, Clause 1.13)

An individual with an National Health Service (NHS) role who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply or use of any medicine but who is not a health professional.

PATIENT ORGANISATION (Clause 1.15)

An organisation mainly comprising of patients and/or caregivers or any user organisation such as a disability organisation, carer or relative organisation and consumer organisation that represents and/or supports the needs of patients and/or caregivers. Transfers of value made to patient organisations are outside the scope of this disclosure report.

EVENTS (Clause 1.7)

Includes all professional, promotional, scientific and educational meetings, congresses, conferences, symposia, and other similar events organised or sponsored by or on behalf of a company.

This includes, but is not limited to:

- advisory board meetings
- visits to research or manufacturing facilities
- planning, training or investigator meetings for clinical trials and non-interventional studies

COLLABORATIVE WORKING (Clause 1.3)

A pharmaceutical company working with other organisations to deliver initiatives which either enhance patient care or are for the benefit of patients or alternatively benefit the NHS and, as a minimum, maintain patient care.

DONATION AND GRANTS (Clause 1.5)

Providing 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 the pharmaceutical company in return.

Donations and grants to individuals are prohibited.

Donations are physical items, services or benefits-in-kind which may be offered or requested.

Grants are the provision of funds.

RESEARCH AND DEVELOPMENT (Clause 1.20)

For the purpose of disclosure, research and development transfers of value are transfers of value to HCPs or HCOs related to the planning or conduct of:

- non-clinical studies (as defined in the OECD Principles on Good Laboratory Practice)
- clinical trials (as defined in Regulation 536/2014)
- non-interventional studies that are prospective in nature and that involve the collection of patient data from or on behalf of individual or groups of health professionals specifically for the study

Costs that are subsidiary to these activities are included in a single aggregate amount.

TRANSFER OF VALUE (TOV, Clause 1.25)

A direct and indirect TOV, whether in cash, in-kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of medicines.

A direct TOVs is one made directly by a company for the benefit of a recipient.

An indirect TOV is those made on behalf of a company for the benefit of a recipient or through an intermediate and where the company knows or can identify the recipient that will benefit from the ToV.

REPORTING OF TRANSFERS OF VALUE

Direct transfers of value will be disclosed in the ToV period during which payments are paid irrespective of the contract date, contract duration or event date.

Indirect ToVs will be disclosed with the date provided to Idorsia UK by the intermediary. In the event that the payment date is not provided by the intermediary, then the event date is used.

TRANSFER OF VALUE CATEGORIES

The following types of ToVs have been disclosed under the following category types.

CATEGORY	DESCRIPTION
Collaborative working	This includes joint working between one or more pharmaceutical companies and the NHS and others which is patient centred and always benefits patients.
Donations and Grants	This includes: <ul style="list-style-type: none"> - Charitable contributions - Educational grants (e.g., fellowships, courses provided by an HCO where Idorsia does not select the individual HCPs participating) - Sponsoring of speakers/faculty which by nature of purpose and funding are classified under educational grants

Event Sponsorship	<p>Placement of a brand logo in a conference program or invitation communication in exchange for supporting the program</p> <ul style="list-style-type: none"> - Funding an event in return for a display booth - Funding an event in exchange for advertising space - Satellite symposia at a congress - Any other activity qualified as "Corporate Sponsorship" - Sponsoring of speaker/faculty and sponsoring courses provided by an HCO which are qualified as "Corporate Sponsorship"
Event Registration Fees	Registration fees paid for the HCP/HCO to attend events
Event Travel and Accommodation	<p>Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking, shared ground transportation).</p> <p>Accommodation</p>
Contracted Services - Fees	<p>Fees received in consideration for consultancy services and/or ToVs resulting from or related to a contract between Idorsia UK Ltd and institutions, organisations or associations of HCPs under which such institutions, organisations or associations provide any type of services to Idorsia Ltd. This includes:</p> <ul style="list-style-type: none"> - Speaker engagements - Advisory Boards - Study-related engagements - Medical writing - Data analysis - Development of education materials - General consulting / advising - Speaker training if linked to a speaker engagement
Contracted Services - Expenses	<p>Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking)</p> <p>Accommodation</p>

EXCLUDED TOVs

The following are not included as TOVs for the purposes of disclosure:

- Hospitality costs, i.e. subsistence provided to health professionals (meals and drinks), unless an integral and inseparable part of the cost of an event, e.g. sponsorship of a third-party HCO event.
- Items for HCPs/ORDMS or HCOs and patient educational materials
- Logistical costs related to Idorsia UK Ltd. organised meetings/events
- Donations to Patient Organisations are reported separately on Idorsia UK Ltd.'s website

OTHER CONSIDERATIONS

MULTI-YEAR CONTRACTS

Idorsia Ltd discloses the details of the payment on the date the ToV was made and not for the full value of the contract.

CROSS-BORDER ENGAGEMENTS

Transfers of value paid from other Idorsia legal entities in other countries to HCPs, ORDMs and HCOs from the UK, will be disclosed within the UK report. The disclosure report includes ToVs made to HCPs, ORDMs and HCOs who practice in the United Kingdom. This includes all ToVs (direct and indirect) made by any Idorsia affiliates in the European countries included in the EFPIA disclosure code. For non EFPIA countries, Idorsia UK will make its best effort to collect and disclose direct transfers of value made by Idorsia affiliates.

Transfers of value paid to other EFPIA country HCPs, ORDMs and HCOs will be disclosed on the Idorsia Pharmaceuticals Ltd company website.

TRACKING AND COLLATION OF DISCLOSURES

Idorsia UK maintains all ToV data made to HCPs, ORDMs and HCOs on a single spreadsheet. This data is based on relevant contracts, agreements, data privacy consent responses, other Idorsia affiliate ToV information, agency submitted ToV information and invoice and payment dates stored on various finance platforms.

CURRENCY

All disclosures will be displayed in pound sterling (GBP). Where payments were made in a currency other than GBP, the disclosed value will be the exact equivalent value in GBP calculated using the exchange rate on the date on which the payment was made.

The pound sterling totals will be calculated using the exchange rate on the date of payment. Readers should understand that the total amounts disclosed in pound sterling could therefore vary slightly from the exact amount paid in the local currency; variations will be greater if there have been significant movements in exchange rate during the reporting period.

TREATMENT OF VAT AND OTHER TAX ASPECTS

Idorsia UK reports transfers of value as net (i.e. without value added tax or withholding tax unless the collection of net values is not possible through Idorsia's financial systems). There are no other tax considerations.

INDIRECT PAYMENTS

Idorsia UK may contract with agencies (such as an advertising, marketing, or PR agency) that make transfers of value to HCPs/HCOs. The end recipient (HCP/HCO) may not appear within Idorsia UK's accounting tool. Idorsia UK Ltd makes the best effort to ensure that these

transfers are value made on our behalf are captured and reported as if they were made directly by requesting information from our agencies.

DATA PRIVACY

In accordance with applicable laws, rules, regulations and requirements relating to the privacy and security of Personal Data (as defined in the EU Data Protection Directive 95/46/EC or any replacement legislation), Idorsia Ltd will obtain permission from the individual prior to disclosing personal data such as individual HCP ToVs. Idorsia has made every effort to secure the necessary permissions.

Where permission has not been obtained or where the individual HCP has refused or withdrawn permission, Idorsia UK has declared the total spend as part of an aggregate figure within each relevant disclosure category, alongside the total number of recipients disclosed in aggregate, and the number of recipients disclosed in aggregate as a % of all recipients (individual & aggregate disclosures).

PUBLICATION

Idorsia UK will submit and publish transparency disclosure reports in line with country timelines as defined by the trade association or government.

This disclosure report covers all payments made to UK HCPs, ORDMs and HCOs between 1st January 2022 to 31st December 2022.

The Idorsia Pharmaceuticals Ltd ToV disclosure report will remain publicly available for a period of 3 years.

MANAGEMENT OF TOV RECIPIENT QUERIES

Queries and clarification requests made by HCPs, ORDMs and HCOs are managed through the ABPI disclosure portal.