

Provepharm Ltd. Methodological note for disclosure of Transfers of Value 2024

Introduction

EFPIA and the Association of British Pharmaceutical Industry (ABPI) Code of Practice 2021 Clauses 28-31 requires that all companies must document and publicly disclose certain transfers of value made directly or indirectly to health professionals, other relevant decision makers (ORDM) and healthcare organisations, patient organisations, and members of the public located in Europe. Disclosure is required even if the payments etc. are made by overseas affiliates, head offices in the UK or overseas and UK based offices. Each company providing transfers of value must publish a note summarising the methodologies used by it in preparing the disclosures and identifying each category of transfer of value.

Due to Data Privacy law, Provepharm Ltd, based in the UK, will rely in the reporting period on the lawful basis of legitimate interest in order to process personal data in respect of individual transfers of value. Under this lawful basis, individuals are entitled to object to the processing of their personal data for this purpose. In the event of any objection which, after consideration by Provepharm, was successful, Provepharm would declare the total spend as an aggregate figure as a separate line entry within the required disclosure section.

Provepharm UK has a policy of only engaging with HCPs who allow disclosure of fees paid.

About Provepharm:

Provepharm Ltd and the French parent company Provepharm Life solutions are committed to maintaining and strengthening trust and transparency with our customers and all of our partners and this is essential to the proper conduct of our commercial relations. Both companies operate under an ethical sustainable commercial charter.

Definitions:

Transfers of value: means a direct or indirect transfer of value, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development or sale of medicines.

- A direct transfer of value is one made directly by Provepharm for the benefit of a recipient
- An indirect transfer of value is one made on behalf of Provepharm for the benefit of a recipient or through an intermediary and where Provepharm knows or can identify the recipient that will benefit from the transfer of value.

Health professional (HCP): For the purposes of disclosure, Provepharm regards all

employees of the NHS or any private Health Care Provider involved in patient care as HCPs regardless of their professional status. In addition, Provepharm regards all registered or qualified healthcare professionals as within the scope of disclosure regardless of their NHS status. Thus retired HCPs fall within scope and academic staff who provide clinical services and support. This 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. In relation to disclosure of transfers of value it also includes any employee of Provepharm whose primary occupation is that of a practicing health professional.

Other relevant decision makers (ORDM): particularly 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.

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 HCPs or ORDMs provide services.

Members of the public: refers to members of the UK public i.e. not an HCP or ORDM and includes patients and journalists.

Registration fee: refers to a fee paid to register, enrol or sign up for a formal training course or meeting or direct funding such as sponsorship fees.

Travel and accommodation: means the costs of travel and accommodation, both inside and outside the UK, this excludes subsistence payments.

Collaborative working: means a situation where, pharmaceutical companies work with other organisations to deliver initiatives which either enhance patient care or are for the benefit of patients or alternatively benefit the National Health Service (NHS) and, as a minimum, maintain patient care.

Support: for an individual, means the provision of a financial contribution, in whole or in part, whether paid directly or indirectly to individual health professionals or other relevant decision makers to attend events/ meetings.

Sponsorship: means a contribution, financial or otherwise, in whole or in part provided by or on behalf of a company towards an activity (including an event/meeting or material) performed, organised, created, etc., by a healthcare organisation, patient organisation or other independent organisation, which there may be some benefit to Provepharm such as a promotional stand.

Grant/Donation: means a grant/donation of funds, benefits-in-kind or services freely given for the purpose of supporting healthcare, scientific research or education, where Provepharm received no reciprocal benefit.

Descriptors:

1. Time period

- This Methodological Note represents disclosures for the date the activity took place, not on the date the payment was made. All transfers of value are paid only after the engagement has taken place.
- Multi-year projects: Where projects run for several years Provepharm will declare the amount paid relevant to the year in which each activity or agreed milestone took place. Thus a project which spans 2 calendar years and includes several individual transfers of value during that time will have two associated disclosures; one for each calendar year showing the value of the transfer incurred in each calendar year.

2. UK Data Privacy

- Individual HCP/ORDM payments have been disclosed against those individuals using the lawful basis of legitimate interest.
- Due to Data Privacy law, Provepharm Ltd, based in the UK, began to rely in the reporting period on the lawful basis of legitimate interest in order to process personal data in respect of individual transfers of value. Under this lawful basis, individuals were entitled to object to the processing of their personal data for this purpose. In the event of any objection which, after consideration by Provepharm, was successful, Provepharm would declare the total spend as an aggregate figure as a separate line entry within the required disclosure section.

3. Tax considerations

- All payments reported do not have any provision for Personal or Corporation Tax paid by HCPs/ORDMs and healthcare organisations.

4. VAT

- Payments made to HCPs/ORDMs for the fee for service are all exclusive of VAT.
- Payments made to HCPs/ORDMs for expenses (e.g travel and accommodation paid directly by the HCP) in relation to service are inclusive of VAT.
- Payments made to healthcare organisations are reported exclusive of VAT.

5. Private companies and associated charities

Where an HCP runs a private company or partnership, etc, for the purposes of their private income any payments to that organisation will be regarded for disclosure purposes as a payment to the HCP directly.

6. Payments to non-UK HCPs or HCOs

All disclosures are made in the country in which the HCP practices or in which the HCO is located. This is controlled by Provepharm France.

Payments made to UK-based organisations by Provepharm's overseas operations are disclosed within the UK regardless of the source of funding. The disclosure figures are provided by Provepharm's corporate headquarters.

7. Patient Organisations

Provepharm did not provide support of this kind during the disclosure period.

8. All Payments were made in GBP.

9. Research & Development

- o No research and development activities were conducted in the UK in the disclosure period. Full Provepharm global spend on Research & Development is disclosed on the Provepharm France EFPIA disclosure platform.

10. Payments to healthcare organisations

- o Paymentstohealthcareorganisationsare disclosed on a 'per activity' basis
- o Payments to healthcare organisations in respect of stand space may be inclusive of food and beverages.
- o On occasion, a healthcare organisation will insist that any services provided by its HCP employees cannot be contracted with the individual HCP but must be a service contracted through the healthcare organisation. Since Provepharm is contracting for the services of a named HCP, if the fee is ultimately received by the HCP will be disclosed under that HCP's entry. If the HCP does not receive any additional payment for the service (e.g. because the activity is during normal working hours and they are being paid by the HCO) then the full amount paid will be disclosed against the healthcare organisation as a fee for service.

11. Payments to HCPs/ORDMs

- o Payments include transfers of value made directly or indirectly to HCPs/ORDMs and include the total amount paid in a calendar year to each individual who has provided services.
- o The names of the HCPs/ORDMs are disclosed unless disclosure on a named basis has been objected to and Provepharm has accepted the objection. In such cases, Provepharm has declared the total spend as an aggregate figure as a separate line entry within the required disclosure section. As a policy Provepharm will not contract those who object before the contract is agreed.
- o Where a HCP has indicated they are independent of any organization, their principle practice has been disclosed as "N/A"
- o Where transfers of value are not individually identifiable, such as group cost, then the total amount will be apportioned equally between all those HCPs/ORDMs who were the beneficiary of the support.
- o Where support has been provided to a HCP e.g. travel and accommodation for an event, this is disclosed in the year of the event. This may differ from the year in which the booking was made.

12. Name matching (from multiple sources)

- o In those circumstances where no first name has been provided, i.e. only an initial, yet another entry may appear to be the same individual, Provepharm has disclosed this as two separate entries.
- o In those circumstances where the first name, surname, place of work and address are the same, this has been assumed to be the same person.

13. Collaborative Working

- o Provepharm has not undertaken any Collaborative Working including Joint Working activity during 2024.

14. Aggregate figures

- o No aggregate amount have been declared for 2024.