

## 2024 Methodological Note – Transparency Declarations under ABPI

### Introduction

This methodological note is intended to help readers understand how Stallergenes UK collected ToV data and prepared reports for disclosure per the guidelines set forth in the ABPI Code.

Stallergenes UK will publish applicable ToV provided directly or indirectly to HCPs, HCOs, or ORDMs between 1 January 2024 and 31 December 2024, in compliance with the ABPI Code of Practice for the Pharmaceutical Industry 2024 (the “ABPI Code”).

The disclosures of payments in kind that are made by Stallergenes UK for its cooperation with medical professionals and healthcare and patient organisations, if the cooperation relates to prescription drugs for human medicine.

Payments in kind are defined as cash payments, non-cash benefits, donations, subsidies or some other form that directly or indirectly relates to consulting or other services, R&D, marketing, sales or other purposes.

Direct payments in kind are those that Stallergenes UK makes directly to a certain recipient.

Indirect payments in kind are those that third parties (such as suppliers, agents, partners, branches or foundations) provide to a recipient in the name or on behalf of Stallergenes UK.

The disclosure includes, but is not limited to, the name and address of the professional, the healthcare organisation or the patient organisation, type and reason for the payment in kind (sponsorships, fees for presentations or consultation services, contribution to professionals' expenses for participating in an event, such as payment of the registration fees, contributions to the travel and hotel expenses etc.) and the relevant amount.

### Data Collection

Stallergenes UK does not have any “over the counter” medicines or medical devices; therefore, all ToV relate to prescription-only medicines.

This disclosure data is not to be used for any other purposes beyond providing transparency surrounding engagements with HCPs, HCOs, and ORDMs. Stallergenes UK, when disclosing these ToV declarations, does not grant any form of license or authorisation, either special or general, allowing anyone to access these ToV declarations and their content.

### Definitions

When preparing our disclosures, we applied the definitions found in the ABPI Code for all applicable terms including, but not limited to, “Healthcare Organisation (HCO),” “Healthcare Professional (HCP),” “Transfers of Value (ToV),” “Research and Development,” “Donation,” “Grant,” and “Sponsorship.”

### Categories of Disclosure

When preparing our disclosures, we applied the standards found in the ABPI Code for all applicable Categories of Disclosure including, but not limited to, “Collaborative Working,” “Donations and Grants to HCOs,” “Contribution to costs of Events,” and “Contracted Services.”

### Indirect Transfers of Value

When preparing our disclosures, we included indirect ToV made to HCPs/HCOs/ORDMs as defined in the ABPI Code. These indirect payments may include work commissioned by Stallergenes UK that is then contracted out to an

individual HCP. In such cases, Stallergenes UK coordinates with the contracted service agency to obtain all necessary information for preparing our transparency disclosures.

### **Data Protection and Aggregate Disclosure**

In connection with the collection and processing of HCPs' personal data, Stallergenes UK complies with all applicable data protection laws. For data collected from August 2022, Stallergenes UK publishes HCPs' personal data, including details of any ToV provided by Aimmune, under the lawful basis of Legitimate Interests in order to meet our strong commitment to ethical and transparent collaboration as a member of ABPI. For ToV in which Stallergenes UK is unable to disclose on an individual basis for legal reasons, including compliance with data protection requirements, Stallergenes UK will disclose on an aggregate basis.

### **Currency**

Where payments were made in a currency other than the currency of the country in which the disclosure report is made, the payment amount will be converted to the disclosure currency based upon the exchange rate that was in effect on the date the payment was made.

### **VAT and Other Tax**

Stallergenes UK reports ToV as net (i.e. without value added tax or withholding tax).

### **Transfer of Value Reporting Date**

Stallergenes discloses all ToV based on the date the transfer occurred (the "Reporting Date") (e.g. date meal was provided) or the check date (e.g. if a contract is signed on 01 November 2024 but the check date for consulting services is 05 August 2024, this payment reporting date will be 05 August 2024 and will be published in the 2024 data disclosure report).

### **Multi-year Projects**

Where projects run for several years, such as clinical trials, Stallergenes UK will declare the payment amount relevant to the year in which each part of the payment was made. For example, if a project spans 2 calendar years and includes several individual ToV during each year, Stallergenes UK will make two associated disclosures, one for each calendar year showing the value of the transfers made in each specific calendar year.

### **Market Research**

Market Research payments made to a contracted service agency will not be disclosed if the research is conducted within industry standard principles of market research and the research is either (1) double-blinded or (2) single-blinded where the HCP recipient may know the identity of Stallergenes UK, but Stallergenes UK does not know the identity of the HCP recipient. Any non-blinded Market-Research-related payments (i.e. the identity of the HCP recipient is known to Stallergenes UK) will be disclosed.

### **Sponsorships for HCPs to Attend Meetings**

Stallergenes UK may support the attendance of HCPs at educational, scientific meetings. Stallergenes UK will disclose the associated Transfers of Value against the individual attendee. Where costs are not individually itemised (e.g. the cost of a bus transferring a group of HCPs from an airport to a conference venue), the total cost will be split equally

between all those receiving the benefit. Costs declared include transport, registration fees, accommodation, and other forms of hospitality.

### **HCP Cancellations and No-Shows**

If an HCP is invited to an event but does not come to such event, any payments made on the date of the event will not be included as a ToV to the HCP who did not attend. However, if there is ToV that is not cancellable or reimbursable (e.g. ToV related to accommodation or transport), this ToV will be included in the relevant transparency declarations. If an event must be cancelled, cancellation fees are not included in transparency declarations.

### **Grants to HCOs for Support to Attend Medical Meetings**

HCOs may make requests inviting Stallergenes UK to provide financial support to assist its employees to attend medical meetings. If Stallergenes UK has agreed to such a request, where the payment is associated with named HCPs, this payment is disclosed as ToV to the named individual HCPs. Where Stallergenes UK is not aware of the identities of the individual HCPs receiving the support, the financial support is declared as a ToV to the named HCO.

### **Contributions to Meetings**

Stallergenes UK will disclose all payments made to HCOs in relation to meetings. This includes direct funding, such as sponsorship fees or the right to host an exhibition stand, and indirect support such as providing a logistics agency or subsidising the cost of registration fees.

### **Transfers of Value to Patient Organisations**

Disclosure data for patient organisations is published on our company website per ABPI Code clause 29.1. If a ToV is associated with an individual HCP working with a PO, then some or all of the funding may be disclosed in two separate disclosure reports – any ToV provided to the HCP will be disclosed against the individual HCP and in the manner required by the ABPI Code; and the total value of the project will be disclosed as a ToV to the PO on Stallergenes UK website. Stallergenes UK will disclose all payments made to POs in relation to meetings. This includes any direct funding that Stallergenes UK may provide to a PO, such as sponsorship fees, and any indirect support, such as providing a logistics agency or subsidising the cost of registration fees.