

**Almirall Ltd**

**Disclosure 2023**

**Methodological Note – March 2024**

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## 1. Introduction

At Amirall we are committed to transparency in our dealings with Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs), to instill trust and transparency, and comply with the ABPI Code of Practice requirements for the disclosure of relevant transfers of value (ToVs).

We believe that transparency is key to building and maintaining confidence and trust in us, and in our medicines. We fully endorse and support the efforts of the ABPI in improving transparency across the pharmaceutical industry.

The ToVs in this report covers all the disclosable payments, to the best of our knowledge, made by Amirall in the UK for the 2023 calendar year.

## 2. Disclosure Methodology

As of January 2023, Almirall Ltd adopted legitimate interest as the lawful basis for processing (previously we worked to the consent model). All HCP disclosures for the full year of 2023 has been made per the legitimate interest basis for processing, which has resulted in a higher rate of individual disclosure to previous years.

ToVs made to UK HCPs, ORDMs or HCOs by Almirall Head Office (Spain) and/or other affiliates have been reported to Almirall Ltd and have been disclosed as required.

ToVs to HCPs conducting business through a limited company have been disclosed against the HCP.

Data was checked for accuracy to the best of our knowledge before publication.

### Disclosure of Research and Development Transfers of Value:

Costs that are subsidiary to these activities are included in the aggregate R&D category.

Almirall discloses payments agreed with universities and research centers for pre-clinical research as well as clinical trial agreements in hospitals (either direct payments or through a third-party), fees of independent professionals to provide research and development services, and investigator's meeting expenses.

We do not disclose the payments made to companies providing services for research and development (CROs).

Fees related to retrospective study work have been disclosed under service contracts with HCPs in accordance with their consent type.

## 3. Categories of Transfers of Value

Disclosures for HCPs includes fees for service (including retrospective studies), travel, accommodation, and registration for third party meetings.

Disclosure for HCOs includes fees for service, sponsorships, and any grants/donation payments.

Almirall Ltd provides grants & donations to certain Patient Organisations in accordance with what is permitted under the Code. Such ToVs made to Patient Organisations will be disclosed by June 2024 and will be available on the Almirall UK website. Members of the public disclosure will be made on the Almirall UK website by June 2024.

Almirall Ltd has not provided any benefits in kind to HCPs, ORDMs and HCOs during 2023.

## 4. Disclosure Scope

Almirall Ltd promotes Prescription Only Medicines (POM) as well as products that are registered as Over the Counter (OTC) Products and / or Medical Devices. Almirall Ltd does not believe these products fall into the excluded disclosure category and as such we have made disclosures against all ToVs for all products irrespective of their registered category.

Free stock of General Sale List (GSL) products are not included within scope for disclosure.

Note: Whilst Medical Devices do not generally fall into the scope of ABPI Code of Practice, Almirall Ltd has made the decision to disclose ToVs made for such products in line with the ABPI Code of Practice if / where

these products can be both promoted and prescribed. For 2023 we had no medical devices related disclosures to make.

HCPs working for Almirall Ltd as employees (full or part time), contracting consultant staff, are not included in the disclosure data, as all such individual's primary occupation is not that of a practicing health professional.

## 5. Specific Considerations

**ToVs in case of partial attendances or cancellation:** There were no cases of partial attendance and therefore these have not been reported in the 2023 disclosure. ToVs that did not ultimately take place or were cancelled are not disclosed as no benefit was received by the HCP, ORDM or HCO.

**Cross-border Activities:** Where Almirall Global or any other Almirall affiliate engages with a UK HCP, ORDM or HCO which results in a ToV; the respective Almirall entity is required to record the engagement in the Customer Relation Management system to ensure that the transaction is captured for local disclosure purposes.

**Country Unique Identifier:** Almirall Ltd aims to maintain an up-to-date contact database which allows HCPs & ORDMs to have more than one practicing address associated with them, for example when an HCP works at different centres / hospitals etc. For the purposes of disclosure, the database utilised only recognises one address - the principal practice address.

**ToVs to forums, networks etc.:** Those that have no associated principal practice address have been disclosed using the address of the lead HCP or ORDM etc. for the purposes of disclosure.

**Multi-year Contracts:** Where agreements, sponsorships, and the like fall into more than one year, these are disclosed when any activity is performed, hence payment will be split over several years.

**Compassionate Use:** Almirall Ltd does not disclose a ToV for any medicines provided on request to HCPs for individual patients which come under 'Compassionate Use Supply'.

**Home address:** In cases where the HCP has a home address as their place of work, such ToVs have been disclosed in aggregate in an effort to protect the individual's privacy.

**Homecare providers:** Payments made to homecare providers, which Almirall uses for the delivery of homecare services nationally, have not been included herein for disclosure. Such payments are treated as fee for service to vendors who do not fall into the category of HCPs or HCOs and for this reason, we have taken the view that such payments fall outside the scope for disclosure.

## 6. Legitimate Interest as the Lawful basis for Processing

**Legitimate Interest:** In previous years Almirall Ltd operated on the Consent model as the lawful basis for disclosure. In the spirit of achieving greater transparency, as of January 2023, Almirall Ltd has adopted legitimate Interest as the lawful basis for processing data for disclosure purposes. As a result of this change, we have seen a significant improvement in the rate of individual disclosure to previous years.

**Management of objections to legitimate interest:** In accordance with GDPR principles, all data subjects are notified of the right to object to having their data processed on the basis of legitimate interest. Data subjects may register their objections via email at [DisclosureUKIE@almirall.com](mailto:DisclosureUKIE@almirall.com). All objections are reviewed by the Head of Compliance and the outcome notified to the data subject within 5 days of registering their objection.

## 7. Financial Information

**Currency:** All disclosed ToV data is reported in GBP. Where a ToV has been provided by Almirall Ltd or a third-party from outside the UK such ToVs are provided in the local currency and converted to GBP using the spot rate during the month of engagement.

**VAT:** VAT is included in the disclosure data, where it applies due to country or event requirements.

**Invoice payment date:** All ToVs taking place in 2023 are disclosed to the best of our knowledge (any data relating to 2023 which was available up to 26<sup>th</sup> March 2024 was included in this report). For pending invoices related to events that took place during 2023, all invoices paid up to 26<sup>th</sup> March 2024 have been included in the 2023 disclosure.

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