

Almirall Ltd

United Kingdom

Methodological Note 2024

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Almirall Ltd

Disclosure 2024

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1. Introduction

Interactions between healthcare companies and Healthcare Professionals (HCPs), Healthcare Organizations (HCOs) and Patient Organizations (POs) are essential to establish and maintain the best possible supply of medicinal products. Almirall Ltd recognizes there is a growing expectation that such interactions must be conducted with integrity and must be transparent in order to create a better understanding of, and ultimately build trust in, the validity of industry interaction with the medical profession. Therefore Almirall Ltd supports the principle of transparency and complies with the ABPI Code of Practice and EFPIA (European Federation of Pharmaceutical Industries and Associations) Codes requirements for the disclosure of Transfers of Value (ToV) conducted in 2024 with Healthcare Professionals, Other Relevant Decision Makers, Healthcare Organizations and Patient Organizations.

Almirall Ltd made every effort to ensure all data required are disclosed and that it complies with all applicable laws, guidance and regulations. Almirall Ltd expects that third parties and business partners apply equivalent standards in any professional activities conducted on its behalf.

The ToVs in this report cover non-disclosable payments, to the best of our knowledge, made by Almirall in the UK in 2024.

2. Definitions

Contribution to costs related to events: is a support providing or covering the costs of meals, travel, accommodation and/or registration fees to support the attendance of an individual HCP or PO Representative to an event organized or created by any company of Almirall and/or a third party.

Donations and grants: collectively, mean providing funds, assets or services freely given for the purpose of supporting healthcare, scientific research or education, with no consequent obligation on the recipient to provide goods or services to the benefit of the donor in return.

Events: All professional, promotional, scientific, educational meetings, congresses, conferences, symposia, and other similar events (including, but not limited to, advisory board meetings, visits to research or manufacturing facilities, and planning, training or investigator meetings for clinical trials and non-interventional studies) organized or sponsored by or on behalf of any company of Almirall.

Fees for services and consultancy: ToVs resulting from or related to contracts between Almirall and any HCP, ORDM or HCO under which such HCP or HCO provide any type of services to Almirall.

Healthcare Organisation (HCO): any legal entity (i) that is a healthcare, medical or scientific association or organization 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 (ii) through which one or more HCPs provide services.

Healthcare Professional (HCP): any natural person that is a member of the medical, dental, pharmacy or nursing professions or any other person who, in the course of his/her professional activities, may prescribe, purchase, supply, recommend or administer a medicinal product and whose primary practice, principal professional address or place of incorporation is in Europe.

Other Relevant Decision Maker (ORDM): The term 'other relevant decision maker' (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.

Patient Organisation (PO): non-for-profit legal person/entity (including the umbrella organisation to which it belongs), mainly composed of patients and/or caregivers, that represents and/or supports the needs of patients and/or caregivers and which business address, place of incorporation or primary place of operation is in Europe.

Research and Development: Transfers of Value to HCPs or HCOs related to the planning or conduct of (i) Non-clinical Studies (as defined in OECD Principles on Good Laboratory Practice); (ii) Clinical Trials (as defined in Regulation 536/2014); and (iii) Non-Interventional Studies (NIS) that are prospective in nature and that involve the collection of patient data from or on behalf of individual, or groups of, HCPs specifically for the study.

Sponsorship: is a support provided on behalf of Almirall, when permitted by law, as a contribution to support an activity (including an Event) performed, organized or created by a HCO, a PO or a third party.

Collaborative Working: collaborative working is an activity defined as being between one or more pharmaceutical companies, healthcare organisations and 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. This broad type of cross-sector working was introduced into the 2021 ABPI Code of Practice, in that project outcomes can be for patient- and/or healthcare-centred projects. Amongst other things, this allows process improvement as a potential outcome and for healthcare organisations that are not part of the NHS to work with pharmaceutical companies. Almirall Ltd did not conduct any collaborative working in 2024 and therefore have no activities to disclose.

Joint Working: as defined in the ABPI Code of Practice, Joint Working is a mechanism for cross-sector working between pharmaceutical companies, healthcare organisations and others. This specific type of cross sector project focuses on direct benefit to patients and is a specific limited form of collaborative working. Almirall Ltd did not conduct any joint working in 2024 and therefore have no activities to disclose.

Medical Devices: 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 2024 we had no medical devices related disclosures to make.

3. Disclosure's scope

Products concerned

Disclosure applies to ToVs made in the context of activities which are completely or partially related to Prescription Only Medicines (POMs). Such activities comprise donations and grants, scientific and professional meetings (sponsorships, costs for registration, travelling and accommodation), services and consultancies (fees and related costs), and Research & Development.

Excluded ToVs

Disclosure does not apply to ToVs that are not mentioned in the previous section "Products concerned" such as ToVs that are: solely related to over-the-counter medicines (OTC), Items of medical utility, meals or medical samples among others.

ToVs date

All ToVs which took place in 2024 are disclosed to the best of our knowledge in this report. For clarification, this means when a ToV has been made between the calendar year of 1st January to 31st December 2024, regardless of when the activity took place.

Direct ToVs

December 2024

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The disclosure includes ToVs made by Almirall Ltd to HCPs and ORDMs whose principal address is in United Kingdom and to Healthcare Organizations and Patient Organizations whose registered address is in the United Kingdom.

Indirect ToVs

Indirect ToVs provided to HCPs, ORDMs or HCOs by third parties on behalf of Almirall (e.g., travel agencies) are assigned to the according HCP or HCO and disclosed accordingly independent of the fact that the ToV was transferred on the bank account of the HCP/HCO or on the bank account of the third party. The third party will not be disclosed.

Non-Monetary ToVs

Disclosure of non-monetary transfers of value is made at the equivalent value in monetary terms.

ToVs in case of partial attendances or cancellation and refund

There were no cases of partial attendance and therefore these have not been reported in the 2024 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 (Spain) or any other Almirall entity outside of the United Kingdom engages with a UK HCP, ORDM, HCO or PO which results in a ToV; the respective Almirall entity engaging the service is required to record the engagement in the Customer Relation Management (CRM) system to ensure that the ToV is captured for local UK disclosure purposes.

Research & Development

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 HCOs (either direct payments or through a third-party), fees of independent professionals to provide research and development services, and investigator's meeting expenses.

Fees related to retrospective study work have been disclosed on an individual basis under the category "fees for services".

4. Specific considerations

Country unique identifier

Almirall Ltd maintains an up-to-date contact database which allows HCPs to have more than one practicing address associated with them, for example when an HCP works at different centers / hospitals etc. For the purposes of disclosure, the database utilized only recognizes one address - the principal practice address.

Self-incorporated HCP

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

Multi-year agreements

Where agreements, sponsorships, studies and the like fall across more than one year, ToVs are disclosed during the calendar year when a payment has been made. Therefore ToVs related to multi-year agreements will be split over several years.

Quality Checks

Prior to reporting, Almirall internal processes ensures that ToVs made to HCPs, ORDMs, HCOs and POs are accurately collected in Almirall. Data quality checks are performed to ensure that any HCP who has objected to Legitimate Interest are reported in 'aggregate' and additional data and process monitoring takes place for quality assurance prior to reporting.

5. Legitimate Interest

Legitimate Interest: 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. All objections are reviewed by the Head of Compliance and the outcome notified to the data subject within 5 days of registering their objection.

Partial Disclosure: with regards to Almirall Ltd's position on Legitimate Interest, in 2024 no individuals have objected to partial disclosure. This is where an individual HCP/ORDM requests that some payments are disclosed on an individual basis and some in aggregate. Where a HCP/ORDM has objected to Legitimate Interest, all related ToVs provided to this individual in 2024 have been disclosed in aggregate.

6. Form of disclosure

Date of publication

ToVs are reported for one calendar year and disclosed in June of the following year.

Disclosure platform

The transparency report is available on the Almirall website and also on the ABPI's Disclosure UK platform. The annual report will remain on the website for three years and all the related documentation is to maintained for a minimum of 5 years.

Disclosure language

December 2024

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The transparency report is available in English.

7. Disclosure financial data

Currency

All disclosed ToV data is reported in GBP. ToVs provided in currencies other than GBP are converted to GBP using the exchange rate of the spend date. This is an automatic conversion that takes place in the internal Almirall disclosure database.

VAT

VAT (Valued added Tax) is included in the disclosure data. Where applies, it may be different due to other country or event requirements.

8. Additional information

Retired Healthcare Professionals/ORDMs: Where there has been a ToV provided to a HCP/ORDM and they have subsequently retired following the engagement, the ToV to this individual has still been included in the disclosure report.

Deceased Healthcare Professionals/ORDMs: Where there has been a ToV provided to a HCP/ORDM and they have subsequently passed away following the engagement, the ToV to this deceased individual has still been included in the disclosure report.

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