



**Bausch & Lomb U.K. Limited**

**Methodological Note 2023**

**ABPI Disclosure Report**

## 1. Introduction

- 1.1 Bausch & Lomb U.K. Limited (**Bausch + Lomb**), a subsidiary of Bausch + Lomb Corporation, is a member of the national Association of the European Federation of Pharmaceutical Industries and Associations (EFPIA) in the United Kingdom, the Association of the British Pharmaceutical Industry (**ABPI**). As a member, Bausch + Lomb is obliged to comply with the ABPI Codes of Conduct, including, but not limited to, the ABPI Code on Disclosure of Transfers of Value from Pharmaceutical Companies to Healthcare Professionals and Healthcare Organisations (**Disclosure Code**).
- 1.2 Bausch + Lomb will disclose the transfer of value related to prescription-only medicines to Healthcare Professionals (HCPs), Other Relevant Decision Markers (ORDMs) and Healthcare Organisations (HCOs) in line with the ABPI Disclosure template. This ABPI Disclosure Report to be published in June 2023 on [www.disclosureuk.org.uk](http://www.disclosureuk.org.uk).
- 1.3 This Methodological Note has been created by Bausch + Lomb to provide supporting information about Bausch + Lomb's ABPI Disclosure Report.
- 1.4 Bausch + Lomb markets prescription only medicine, medical devices and over-the-counter medicine.

## 2. Terminology and Definitions

- 2.1 **Healthcare Professionals (HCPs)** are defined as 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.
- 2.2 **Other Relevant Decision Markers (ORDMs)** 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 healthcare professionals.
- 2.3 **Healthcare Organisation (HCO)** is either a healthcare, medical or scientific association or organisation such as a hospital, clinic, foundation, university or other address, place of incorporation or primary place of operation is in Europe or an organisation through which one or more healthcare professionals or other relevant decision makers provide services.
- 2.4 **Transfer of Value (ToV)** means a direct or indirect transfer of value, whether in cash, in kind or otherwise, in connection with the development or sale of medicines. A direct transfer of value is one made directly by a company for the benefit of a recipient. An indirect transfer of value is one made by a third party on behalf of a company for the benefit of a recipient where the identity of the company is known to, or can be identified by, the recipient.
- 2.5 Unless otherwise defined herein, capitalised words in this Note shall have the meaning attributed to them in the Disclosure Code.

## 3. Scope of the Transfers of Value Disclosure

- 3.1 As a member of ABPI, Bausch + Lomb complies with the obligation to collect, disclose and report ToVs related to prescription-only medicines to HCPs, ORDMs and HCOs.

- 3.2 The Transfers of Value disclosed in this ABPI Disclosure Report covers all ToVs related to prescription-only medicines in the calendar year 2023, to the best of our knowledge, made by Bausch + Lomb and its affiliates to HCPs, ORDMs and HCOs resident in the United Kingdom.
- 3.3 **Over-the-counter medicines (OTC):** OTC medicines are out of scope for this ABPI Disclosure Report.
- 3.4 **Medical Devices:** Medical Devices are out of scope for this ABPI Disclosure Report. As a member of the Association of the British Healthcare Industry (“**ABHI**”), the United Kingdom’s MedTech National Association, Bausch + Lomb complies with the obligation to collect, disclose and report transfers of value in accordance with the ABHI Code of Ethical Business Practice.
- 3.5 **Mixed Activities:** Where any interaction or activity is supported by our Pharma business in conjunction with our Medical Devices or OTC business, the total ToV is reported as part of this ABPI Disclosure Report.
- 3.6 **Timing of Transfers of Value:** In this ABPI Disclosure Report, Bausch + Lomb discloses the amounts of value transferred by type of ToVs during the full calendar year 2023 (i.e., 1 January 2023 to 31 December 2023). ToVs are disclosed based on the date the payment has been recorded in our internal accounting system.
- 3.7 **Means of identification of payments and Transfers of Value:**
- 3.7.1 **Direct Transfers of Value:** Payments from Bausch + Lomb made directly to HCPs, ORDMs and HCOs can only be made via Purchase Order or Payment Request. All such payments have been examined and considered for disclosure.
- 3.7.2 **Indirect Transfers of Value:** Indirect Transfers of Value to HCPs, ORDMs or HCOs which have been paid by Bausch + Lomb to third parties such as hotels or travel companies have been identified and included in our disclosure.
- 3.7.3 **Cross border Transfers of Value:** This ABPI Disclosure Report includes ToVs to HCPs, ORDMs and HCOs that are resident in the United Kingdom. This includes all ToVs (direct and indirect) made by any Bausch + Lomb affiliate. Bausch + Lomb works with its affiliates to gather the data to identify and disclose ToVs made by Bausch + Lomb affiliates, if any. There have been no such ToVs identified for this reporting period.
- 4. Finance Related Matters**
- 4.1 **VAT:** All sums exclude any VAT. In most cases there is no VAT applicable when paying a HCP/HCO or the VAT is recoverable by Bausch + Lomb.
- 4.2 **Currency:** All Sums are reported in British Pounds (GBP). All sums paid to or on behalf HCPs/ORDMs//HCOs for this reporting period were in GBP.
- 4.3 **Numbers:** Sums paid to HCPs, ORDMs and HCOs may include more than one event or engagement.
- 4.4 **FMV:** All payments are made in line with fair market value and pursuant to ABPI guidelines for travel and subsistence.

4.5 **Multi-year contracts:** It is Bausch + Lomb’s policy to only enter into contracts, subject to ToV, for a maximum of one-year term. Where contracts are valid for more than one year or the term crosses over two calendar years, each individual ToV is captured and disclosed in the corresponding reporting period.

## 5. Activities

Category	Subcategory	Activities
Collaborative Working	N/A	<ul style="list-style-type: none"> <li>• Where Bausch + Lomb has been working with more than one organisation for a collaborative working project</li> </ul>
Donations and Grants (HCOs only)	N/A	<ul style="list-style-type: none"> <li>• Charitable contributions</li> <li>• Educational grants to HCO to support courses and meetings (where a member company does not select the individual HCPs who participate)</li> <li>• Medical and Educational Goods and Services (MEGS) grants</li> <li>• Studentships</li> </ul>
Contribution to Cost of Events	Sponsorship Agreements (HCOs only)	<ul style="list-style-type: none"> <li>• Placement of a brand logo in a conference program or invitation communication in exchange for supporting the program</li> <li>• Funding an event in return for a display booth/promotional stand</li> <li>• Funding an event in exchange for advertising space</li> <li>• Other advertisement space (in paper, electronic or other format)</li> <li>• Satellite symposia at a</li> </ul>

		<p>congress</p> <ul style="list-style-type: none"> <li>• If part of a package: Name badges, drinks, meals etc. provided by the organisers (included in the sponsorship agreement)</li> <li>• Sponsoring of speaker/faculty and sponsoring courses provided by a HCO</li> </ul>
	Registration fees	<ul style="list-style-type: none"> <li>• Fees paid for HCP/HCO to attend educational events not organised by Bausch + Lomb</li> </ul>
	Travel & Accommodation	<ul style="list-style-type: none"> <li>• Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking)</li> <li>• Accommodation</li> </ul>
Contracted Services	Fees	<ul style="list-style-type: none"> <li>• Speakers' fees</li> <li>• Medical writing (unless the medical writing forms an integral part of an Investigator Initiated trial, then it will be disclosed as Research)</li> <li>• Data analysis</li> <li>• Development of education materials</li> <li>• General consulting / advising</li> <li>• Unblinded market research</li> <li>• Retrospective non-interventional studies</li> </ul>
	Related expenses	<ul style="list-style-type: none"> <li>• Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking)</li> <li>• Accommodation</li> </ul>
R&D	N/A	<ul style="list-style-type: none"> <li>• Clinical Trials</li> <li>• Data Monitoring Committees related to studies</li> <li>• Non-Interventional Studies</li> <li>• Investigator-Initiated Research (IIR)</li> <li>• Clinical &amp; Research Collaboration</li> <li>• Research Grants</li> </ul>

## 6. Collaborative working

There were no collaborative working activities for this reporting period.

## 7. Grants and Donations

Grants and donations are only paid to an institution never an individual. All grants are reviewed by a grants committee consisting of non-sales functions such as Legal, Compliance & Ethics, and Medical.

## 8. R&D

There was no reportable R&D activity for this reporting period.

## 9. Events

9.1 Events are defined as promotional, scientific or professional 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 conducting of investigator meetings for clinical trials and non-interventional studies) organised or sponsored by or on behalf of Bausch + Lomb.

9.2 ToVs to participating HCPs/HCOs related to such events falling under the definition above are disclosed in the "Costs of Events" sub-categories "Sponsorship Agreements", "Registration Fees" or "Travel and Accommodation".

9.3 Where a HCO engages a professional conference organiser or events management company to organise or manage the event and we make a payment to such entity, for example, for the hire of booths or promotional stand space, any such ToVs have been reported as being received by HCO in the "Sponsorship Agreements" section.

9.4 There are a few third-party meetings that we support in return for placing a promotional stand at their meeting that are organised by "informal groups" in the healthcare field, which are not legal entities, have no formal address nor a place of establishment. Given the nature of these "informal groups" Bausch + Lomb does not report these.

9.5 Where Bausch + Lomb has made a ToV to a HCO for catering, in return for putting up a promotional stand, this ToV has been reported in "Sponsorship Agreements" section.

9.6 Payments to HCOs are in the main sponsorship towards the costs of an event, Bausch + Lomb stipulate that no parts of the funding can be used for entertainment or inappropriate hospitality. The majority are small payments; larger sums are in the main due to multi event sponsorship.

- 9.7 Fees, plus related expenses are disclosed as two separate amounts in relation to ToVs resulting from or related to contract between Bausch + Lomb and HCP under which such HCP provides any type of services as listed above.

## **10. Data Privacy**

- 10.1 Bausch + Lomb is committed to comply with regional and local data privacy regulations. All contracts with HCPs and HCOs contain a clause advising of the disclosure requirements under the Disclosure Code.
- 10.2 Bausch + Lomb discloses ToV in this ABPI Disclosure Report based on legitimate interest.
- 10.3 Each HCP is advised in advance of publication of Bausch + Lomb's ABPI Disclosure Report of (a) the details of the ToV disclosure ( amount to be disclosed, the event(s) it concerned, and the breakdown of honorarium, travel and accommodation) under their name; and (b) are provided with a copy of our current HCP Privacy Notice, which includes details of their right to object to such processing.
- 10.4 HCPs are entitled to object to this processing at any time by writing to Bausch + Lomb and requesting that their personal information is not publicly disclosed. In such cases, Bausch + Lomb shall take the required actions to move all such ToVs disclosed by Bausch + Lomb from the 'individual named disclosure' section of the ABPI Disclosure Report to the 'aggregate' section of the report.

## **11. Health Professionals employed by Bausch + Lomb**

Bausch + Lomb do not disclose remuneration paid to HCPs employed by Bausch + Lomb. Bausch + Lomb would not disclose any support provided by Bausch + Lomb to a Bausch + Lomb employee, who is also a HCP, to attend a third-party meeting as such an employee's attendance at the meeting would be for professional reasons related to their Bausch + Lomb employment.

## **12. Disclosure reporting: individual vs. aggregate reporting**

HCP/HCO disclosure will take place on an individual basis unless the HCP/HCO has objected to the processing of their personal data. In such situations Bausch + Lomb will disclose such ToVs in the aggregate.