

METHODOLOGICAL NOTE

1. Introduction

Ferring regularly works with HCP/HCOs and this Methodological note provides a summary of the methodologies used by Ferring in line with the ABPI Code of Practice 2021 to report on Transfers of Value between Ferring and HCP/HCOs.

2. Definitions

HCP: An individual who is qualified to prescribe, administer, purchase, supply or recommend a Medicinal Product whose primary practice, principal professional address or place of incorporation is in Europe¹. is in Europe.

HCO: Any legal person (i) that is a healthcare, medical or scientific association or organization (irrespective of the legal or organizational form) such as a hospital, clinic, foundation, university or other teaching institution or learned society (except for patient organizations within the scope of the EFPIA PO Code) whose business address, place of incorporation or primary place of operation is in Europe or (ii) through which one or more HCPs provide services.

TOV: Transfer of Value - Direct and indirect TOV, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of prescription only medicine exclusively for human use. Direct TOVs are those made directly by a Member Company for the benefit of a Recipient. Indirect TOVs are those made on behalf of a Member Company for the benefit of a Recipient, or those made through a Third Party and where the Member Company knows or can identify the Recipient that will benefit from the Transfer of Value

Donations, Grants, Sponsorship: Providing funds, benefits in-kind, or services freely given for the purpose of supporting healthcare, scientific research or education, with no consequent obligation on the recipient organisation, institution and the like to provide goods or services to Ferring to the benefit of Ferring in return. Donations and grants to HCPs are prohibited.

3. Completion of the ABPI Disclosure template

At the start of 2022 TOV disclosure data in respect of 2021 is inputted into the ABPI disclosure template from Financial Agreements made with the HCP/HCO and checked before uploading to the ABPI portal. Cross border transfer of values from our affiliates for UK HCPs and HCOs are also included in the submission.

4. How has consent been obtained?

Consent to provide disclosure information of transfer of values is included as a part of the financial agreement completed by the HCP/HCO with a clear GDPR disclaimer.

5. Tax considerations

It is the responsibility of the HCP/HCO to inform tax authorities of payments received as transfer of values from Ferring. Ferring is not responsible for providing information to tax authorities regarding payments made to HCPs and HCOs.

5. VAT (included or not)?

VAT is not included in the payments.

6. Currency aspects?

- Conversion rates:

All 2021 payments were made either in UKP or Euro's, Euro entries were converted to UKP by Ferring on the 21st March using the conversion rate of 0.84.

7. Multi-year contracts:

Only contracts with ToV where the payment was actually made in 2021 have been included in the 2021 disclosure. For contracts where the invoices are paid out in 2022, the disclosure will be made in 2022.

8. Over-the-counter transfers of value? Are they/some included?

According to 2021 Code of Practice, these are not required to be disclosed (clause 1.25). Ferring didn't have any over-the-counter transfers of value.

9. Medical device transfers of value?

No transfer of values were made for medical devices in 2021.