ABPI DISCLOSURE 2024 – GENERAL POINTS

- Information disclosed in the disclosure template includes all ToV transactions exluding VAT paid to HCPs, ORDMS and HCOs during the period.
- Most transactions are extracted from the company's accounting package. Only a fraction are transactions paid by another member of the Gedeon Richter group.
- Transactions in foreign currency were converted to local UK currency at time of entry in the accounting package.
- The terms "sponsorship", "grant" and "donation" and principles of application are clearly defined in the relevant company policies and SOPs. Rules and principles of sponsorship are also detailed in the HCP document templates.
- The company does not operate multi-year contracts. Nor does it report over the counter or medical device transfers of value.

METHODOLOGY

TOV agreement with third party → Data input → Reporting
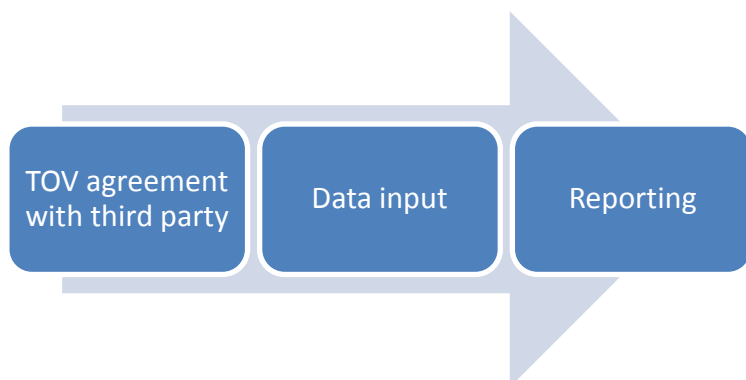
THIRD PARTY AGREEMENT TO DISCLOSE/NOT DISCLOSE

Gedeon Richter has included an appropriate section to this effect in all its agreements with Health care professionals before there is transfer of value involved. The section includes two boxes where the healthcare professional indicates his/her approval to disclose or not disclose the transfer of Value.

Sponsorships and donations to Health Care Organisations are disclosed automatically unless the transaction can't be traced back to the HCO. Then, it is aggregated.

DATA MANAGEMENT

- Finance has created a flag "disclose/do not disclose" that is stored against the Supplier record in its accounting system.
- Also in the Supplier record is stored the "HCO" and "HCP" category that enable Finance to pick only suppliers that belong to one or the other category.

- When a transaction is posted in the Accounting package, Finance determines whether the transaction falls into any of the categories defined within the ABPI template (Registration fees, consultancy fees, travel expenses, etc). Appropriate identifiers have been created in the accounting software to that effect.

REPORTING

Cells are populated automatically by formula using XRL (add-on to Excel) which opens a link to our accounting package and takes the information based on relevant criteria.

Transactions reported paid by another member of the group are aggregated manually.