Gilead Transparency Reporting Methodological Note

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1 Introduction

This methodological note is intended to help readers understand how the **Transfers of Value (ToVs)** from Gilead Sciences Inc. and its **Affiliates** (**Gilead**) to **Healthcare Professionals (HCPs)**, **Healthcare Organisations (HCOs)** and **Other Relevant Decision Makers** (collectively referred to as **Reportable Recipients**) within **the United Kingdom** countries have been collated and reported. A glossary has been included at the end of this methodological note containing an alphabetical list of the main terms used within this note and their definitions. The terms in the glossary are always capitalised and appear in bold on first use within this note to aid lookup. The glossary also contains hyperlinks to other terms defined within the glossary to aid understanding.

Gilead began its EFPIA transparency reporting project in 2013 to supplement existing country transparency reporting mechanisms in Denmark, France, Netherlands, Portugal, and UK. This was to ensure that Gilead would be ready to capture all relevant ToVs to **Reportable Recipients** prospectively throughout 2015 prior to the first EFPIA disclosure in 2016.

To enable Gilead to have assurance that all ToVs to all Reportable Recipients will be reported in the correct format and language(s) for each country, it was decided to automate and standardise data extraction as far as possible and to use a **Reporting Engine** supplied by a **Reporting Engine Provider** to produce the reports.

In 2021, Gilead changed the Reporting Engine and its Provider as part of an overhaul and streamlining of its transparency systems globally within Global Transparency Project. The principles and methodology described in this document continue to apply in the new system and where there is a change as a result of this transition this is explicitly stated herewith. A **Compliance Manager** is responsible for ensuring completeness and accuracy of data.

2 Definition of Transfers of Value

ToVs may arise from the following broad types of activity (there are others):

a. **Advisory Boards** - HCPs give Gilead independent advice and contribute with their expertise on particular aspects of Gilead's strategy or the use of Gilead's medicines, where the knowledge cannot be obtained within Gilead. Gilead may pay an honorarium to each participant and / or pay their travelling expenses to the place where the meeting is being held.
b. **Meetings** - Gilead arranges meetings for HCPs on different topics such as education on a specific therapy area or other scientific events. The knowledge and expertise of HCPs are often needed to help conduct these events. Gilead may pay an honorarium and/or travelling expenses to the consultants participating in these events.
c. **Individual support** – Gilead may support one or more HCPs to attend a scientific conference , meeting or congress which might include paying the HCPs' conference fees and / or their travelling expenses.
d. **HCO Sponsorship** - Gilead may Sponsor one or more HCOs who will choose which HCPs to send to a conference. In this case, Gilead does not know which HCPs received the ToVs and will therefore report the ToVs against the relevant HCOs.
e. **Clinical trials** - Gilead pays HCOs to participate in clinical trials which are an essential part of ensuring that medicines are effective and have an appropriate safety profile. Gilead may also

pay travelling expenses for HCPs involved in clinical trials to travel to meetings with other HCPs involved in the same clinical trials. Clinical trials ToVs are reported within the aggregated figure for research and development activities within each country provided the clinical trials are not Non-Interventional Retrospective. Following the relevant EFPIA guidance, any ToVs for Non-Interventional Retrospective clinical trials are reported at individual level as fees for services and associated travelling expenses.

f. **Market research** - small ToVs might be made to HCPs in return for answering questions about Gilead products and / or a therapeutic area. Gilead generally participates in "double blinded" market research where it does not know the identities of the participants. Gilead has therefore not reported any ToVs for these market research activities.

g. **Investigator Sponsored Research** – research may be undertaken by individual HCPs and / or HCOs where they would like to investigate a particular aspect of a Gilead medicine. This type of research, where supported by paying a **Grant** to the relevant HCO, is reported as a ToV under the appropriate heading.

h. **Grants and Donations –** Gilead may make grants or donations to HCOs to enhance patient care, or benefit the NHS and maintain patient care, or for the purpose of supporting research.

i. **Benefits in kind -** Gilead may provide the NHS with services in kind (for example: secondments, volunteering staff, education) for the purpose of enhancing or maintaining patient care, or for the purpose of supporting research. A financial value will be assigned to the benefit.

j. Collaborative Working – Gilead may work in collaboration with the NHS on activities which benefit patients and/or the NHS where there is a shared commitment to successful delivery.

k. Note that food and drink provided to individuals are not reportable under the EFPIA Code.

3 Definition and management of Cross-Border Spend

Some ToVs to Reportable Recipients are made by a Gilead Affiliate, or on behalf of a Gilead Affiliate, that is not the "home country" (country of principal practice) of the Reportable Recipient receiving the ToVs. For example, Gilead UK might make ToVs to a German HCP, or an events agency working for Gilead's European Head Office might make ToVs to several HCPs from different countries. This is called **Cross-Border Spend**.

Any ToVs made by, or on behalf of, any Gilead Affiliates to Reportable Recipients within EFPIA countries, including Cross-Border Spend, are captured as described under "How Transfers of Value are captured and recorded by Gilead".

4 Which Recipients of Transfers of Value are reported by Gilead

Gilead identifies all Reportable Recipients as defined under the EFPIA Code within its internal systems to facilitate the extraction of relevant Transfers of Value (ToVs). The definition of Reportable Recipients can be found in the Glossary.

For healthcare professionals (HCPs) who have established separate legal entities to provide their services, Gilead discloses the transfer of value under the names of the HCPs themselves when clearly

identifiable. If not, the transfer of value is disclosed under the name of the legal entity, which is treated as a healthcare organization (HCO).

When Gilead makes a transfer of value to a department within an HCO, the transfer of value is disclosed under the name of the HCO, not the department.

In all EFPIA reporting countries, the local reporting template used is in the local language(s) and includes any additional fields required by specific countries, such as unique identifiers for HCPs and/or HCOs.

Professional Congress Organisers (PCOs) are not considered reportable recipients. Transfers of Value made to PCOs are disclosed under the end recipients (HCOs or HCPs) if they are clearly identifiable and the exact values transferred to them are provided by the PCOs.

If HCPs cease practicing and provide services through consultancy, Gilead will not treat them as HCPs for disclosure purposes if it is established that they are no longer practicing or are not relevant decision-makers. Consequently, relevant Transfers of Value will not be included in this disclosure.

Gilead does not disclose Transfers of Value made to healthcare professionals who are employed by the company.

5 How Transfers of Value are captured and recorded by Gilead

5.1. Direct Spend

Gilead makes some ToVs directly to Reportable Recipients; these transfers are referred to as **Direct Spend.** Direct Spend typically covers items such as fees for services and associated travelling expenses, plus any non-monetary ToVs made to HCPs via Gilead employee out-of-pocket expenses.

5.2. Indirect Spend

Gilead has modified its Enterprise Resource Planning (ERP) system and employee expense reimbursement system to extract all Direct Spend to any Reportable Recipient into a standardised format. These data are uploaded into an internal database where they are checked and stored temporarily before being transferred to the Reporting Engine.

ToVs made to Reportable Recipients by **Third Party Vendors** on behalf of Gilead are called **Indirect Spend**. Indirect Spend typically covers travel and accommodation at meetings and conferences and may also include honoraria payments.

Gilead uses a template Excel spreadsheet to enable Third Party Vendors to capture ToVs to Reportable Recipients. The template Excel spreadsheet provides data in the same standardised format, which are then treated in the same way as for Direct Spend as described above.

5.3. ToV Dates

The date recorded against each ToV determines the ToV reporting period. The ToV date recorded by Gilead is the payment date except for the following instances:

a. Air / Rail Travel: The ToV date is the departure date of the respective trip.

b. Travel Transfers: The ToV date is the date the transfer was provided; and
c. Accommodation: The ToV date is the latest date on which the accommodation was provided (i.e. the last day of the hotel stay).

Some payments were made in 2024 for activities that occurred in 2023, and these are reported as ToVs in the 2024 report. Equally, some payments were made, and will be reported, in 2024 that relate to activities that occur in 2025.

5.4. Treatment of Tax

The ABPI implementation of the EFPIA Code permits companies to choose whether to report ToVs inclusive or exclusive of taxes, Gilead has chosen to report inclusive of taxes.

5.5. Currency Management

Each ToV is transferred to the Reporting Engine in its original currency. The Reporting Engine has the capability to convert the ToV into any currency enabled within the system. This permits Gilead to publish the required local report in local currency, albeit some ToVs may have been made in a currency other than the local currency.

The Reporting Engine Provider maintains exchange rates within the Reporting Engine using rates obtained from a well-known, reputable provider.

6 Legal Basis for Disclosure

In the past, Gilead has relied on an annual consent collection process in order to make the Disclosures required under the ABPI Code. HCPs were contacted multiple times during each year to provide consent to disclose the transfer of values made to them

Gilead believes that Disclosure improves transparency of relationships between the public, Healthcare stakeholders and Gilead. At the end of 2019, Gilead undertook a review of the legal basis upon which it relied in order to make public the Disclosures. That review resulted in a change in that legal basis by which Gilead makes a Disclosure.

Starting with the Disclosure of all 2020 data, Gilead will be relying on legitimate interest as the legal basis for Disclosure purposes. Transfers of value were publicly disclosed individually on a named basis unless the explicit request from the HCP to opt out.

In line with recent recommendations from the ABPI, Gilead will be requesting from HCPs to provide the reason(s) for objecting to disclosure on a named basis, in order to assess the impact that such disclosure would have on the HCP. The objection will be assessed via a balancing test (as set out in the attached ABPI Legitimate Interest toolkit) and an outcome will be provided to the HCP.

HCPs have the option to contact Gilead to object to disclosure.

When possible, before any publications are made, Gilead will provide HCPs with the opportunity to check the information that is held to ensure that it is accurate and complete. If Gilead was unable to inform an HCP with the annual TOVs provided to them by Gilead, HCPs have an opportunity to object to disclosure when contacted by the ABPI prior to the disclosure publication.

Gilead does not permit "cherry-picking": either all ToVs made to a Reportable Recipient in a reporting period are disclosed individually, or they are disclosed in aggregate.

Consent is not required for organisations.

7 How Gilead avoids reporting duplicate transactions

Gilead has put in place several steps to ensure that ToVs are reported only once. The key step is that the Gilead Affiliate that makes the ToV is responsible for capturing the ToV.

Where Gilead works with other pharmaceutical companies, each company reports the ToVs relating to the activities that they organised. For jointly organised events, the companies agree in advance which ToVs will be reported by each company. This mechanism avoids duplicate reporting for joint activities.

Compliance Managers are responsible for reviewing Reportable Recipient ToVs in the Reporting Engine and taking reasonable steps to identify and resolve any potential duplicates flagged by the reporting engine built in MDM tool

As a minimum, Reportable Recipients are notified of the availability of ToVs Gilead intends to disclose in their name, and therefore have the opportunity to identify any duplications or other errors. If Gilead was unable to inform an HCP with the annual TOVs provided to them by Gilead, HCPs have an opportunity to raise a query when contacted by the ABPI prior to the disclosure publication

8 How Gilead checks the accuracy of reports

In addition to the steps above to prevent duplicate ToVs, Transparency & Monitoring Specialists also review Reportable Recipient ToVs in the Reporting Engine for accuracy, consistency and completeness. Some of the activities they undertake as part of this review may include:

a. Identifying inconsistencies in the EFPIA Report output, such as travelling expenses associated with services with no fees for services, or travelling expenses related to Sponsorship of cost of events without any associated registration costs;
b. Sample checking ToVs back to source documentation, such as signed contracts or supplier invoices; and
c. Tracing expected ToVs from planning documents through to the Reporting Engine;
d. Before the disclosure publication, reportable recipients are given the opportunity to review the ToVs associated with them, and request amendment if required.

Such activities as those described above give Gilead reasonable assurance that the ToVs it reports are as accurate and complete as possible.

9 Publication of reports

Transparency & Monitoring Specialists are responsible for producing the local report required under their local EFPIA Disclosure Code implementation and publishing it appropriately. The ABPI report is published on the ABPI central platform.

Reportable Recipients may notify Gilead of any errors in reporting or withdraw their Consent at any time.

Gilead's document retention period is 10 years in lieu of any statutory retention period.

Any queries regarding Gilead's ABPI reporting should be addressed to UKITransparency@gilead.com.

March 2025

10 Glossary

This glossary includes the technical definitions of all terms used within this methodological note, including relevant abbreviations.

Term	Meaning
ABPI	The Association of the British Pharmaceutical Industry (ABPI) is the trade association for over 120 companies in the UK producing prescription medicines for humans.
Consent	Consent refers to the Reportable Recipient agreeing to Gilead's use and disclosure of that Reportable Recipient's personal data for Data Privacy purposes. To be valid, Consent must be given freely and must be informed. For Consent to be 'informed', Gilead must tell the Reportable Recipient in advance of Consent being given: (i) what personal data of that Reportable Recipient Gilead wants to collect; and (ii) how Gilead intends to use that personal data. Consent can be withdrawn by the relevant Reportable Recipient at any time by giving notice to Gilead.
Cross-Border Spend	Any payment made by one Gilead group company to a payee (Reportable Recipient) who is reportable by another Gilead Affiliate (e.g. a payment made by the UK Affiliate to a German HCP is reportable by Gilead Germany).
Data Privacy / Data Protection	The laws relating to processing of personal data (information relating to an identifiable person), including General Data Protection Regulation (GDPR) and national legislation implementing the same.
Transparency & Monitoring Specialist	The Transparency & Monitoring Specialist is the individual in each Gilead Affiliate who is responsible for: • generating, maintaining and publishing disclosure reports • co-ordinating communications with Reportable Recipients and taking appropriate action to resolve any identified issues
Direct Spend	Direct spend means all Transfers of Value to a Reportable Recipient made directly by Gilead. In other words, all sums paid by Gilead directly to a Reportable Recipient. This spend is recorded in Gilead's **ERP** (finance) system. See also Indirect Spend.
Disclosure Code	See EFPIA Code.
Donation	Philanthropic payment to a registered charity.
EFPIA	EFPIA or the 'European Federation of Pharmaceutical Industries and Associations' is the body that represents the pharmaceutical industry in Europe. Further information can be found here.
EFPIA Code	The EFPIA Code constitutes the collection of ethical rules agreed by EFPIA members for the Promotion of Medicinal Products to HCPs and the interactions with HCPs, HCOs and POs, with the intent of guaranteeing that these activities are conducted while respecting the most stringent ethical principles of professionalism and responsibility. This Code applies to all types of communication and interaction (traditional and digital). The requirements for Disclosure of ToVs made to HCPs, HCOs and POs is part of the EFPIA Code. More details can be found here

EFPIA Report	The local report of ToVs to Reportable Recipients as required by the EFPIA Code.
Enterprise Resource Planning (ERP)	The system that enables Gilead to generate and manage purchase orders, invoices and other key business documents.
Gilead	Gilead Sciences Inc. and its Affiliates.
Gilead Affiliate	Any Gilead group company in any country, including those outside the EFPIA remit.
Grant	Funding given to independent organisations, such as HCOs, for particular projects.
Healthcare Organisation (HCO)	The definition given in the EFPIA Code is: *"any legal person/entity* *(i) that is a healthcare, medical or scientific association or organisation (irrespective of the legal or organisational form) such as a hospital, clinic, foundation, university or other teaching institution or learned society (except for POs within the scope of article 21) 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)	The definition given in the EFPIA Code is: *"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..* For the purpose of this Code, the definition of HCPs includes *:* *(i) any official or employee of a government, agency or other organisation (whether in the public or private sector) that may prescribe, purchase, supply, recommend or administer Medicinal Products and;* *(ii) any employee of a Member Company whose primary occupation is that of a practising HCP,* *but excludes:* *(x) all other employees of a Member Company; and* (y) *a wholesaler or distributor of medicinal products."*
Indirect Spend	Indirect spend means all Transfers of Value to a Reportable Recipient which are made by a Third Party Vendor on Gilead's behalf.
Investigator Sponsored Research	Research may be undertaken by individual HCPs and / or HCOs where they would like to investigate a particular aspect of a Gilead medicine. Gilead may choose to support this research by paying a Grant to the relevant HCO.
Legitimate Interest	Legitimate interest refers to a legal basis for processing personal data under the GDPR. It allows an organization to process personal data if it is necessary for the purposes of the legitimate interests pursued by the organization or a third party, provided that these interests are not overridden by the interests or fundamental rights and freedoms of the data subject. Legitimate interest must be balanced against the individual's rights and expectations, and the organization must ensure transparency and accountability in its data processing activities.
Objection to Consent	Objection to consent refers to the right of a Reportable Recipient to object to the processing of their personal data based on consent. If a Reportable Recipient objects to the use and disclosure of their personal data, Gilead must cease processing the data for the purposes to which the objection relates. This right allows individuals to withdraw their consent at any time, ensuring that their personal data is not used in ways they do not agree with.

ORDM (Other Relevant Decision Maker)	Under the ABPI Code, an ORDM refers to any individual who, although not a healthcare professional (HCP), has the authority or influence to make decisions regarding the prescription, purchase, supply, or administration of medicinal products. This can include individuals in managerial, administrative, or other roles within healthcare organizations (HCOs) who have a significant impact on the decision-making process related to medicinal products.
Patient Organisation (PO)	Patient organisations are not-for-profit organisations (including the umbrella organisations to which they belong), mainly composed of patients and/or caregivers, that represent and/or support the needs of patients and/or caregivers. Some Non-for-Profit Organisations (NGOs) that do not identify as 'Patient Organisations' may receive funding from Gilead to support specific projects which directly support the needs of patients within the scope of Gilead's therapeutic areas. Gilead considers that this funding qualifies as a reportable ToV and has therefore reported against the NGO under these circumstances. Different countries may be required to follow varying legal definitions as to what qualifies an organisation to be identified as a 'Patient Organisation', or whether it is considered an HCO. Please refer to the individual country methodological note for further clarification.
Reportable Recipient	Means any HCPs/HCOs/ORDMs in relation to whom Gilead is required to disclose the Transfers of Value that it makes.
Reportable Spend	All Transfers of Value made by any Gilead Affiliate, or by any third party on behalf of any Gilead Affiliate, to any Reportable Recipient.
Reporting Engine	The database and reporting system that holds ToV data and enables Gilead to produce the EFPIA Reports in the appropriate format and language for each EFPIA reporting country.
Reporting Engine Provider	The software company that owns the Reporting Engine and maintains it for Gilead.
Sponsorship	**Individual Sponsorship** – financial support for Reportable Recipients to attend educational events including travel, accommodation and/or registration fees. **Event Sponsorship –** financial support for Third Party educational events.
Third Party Vendors	Any agency (e.g. medical education agency, events agency, Contract Research Organisation) which makes payments to Reportable Recipients on Gilead's behalf.
Transfer of Value (ToV)	A Transfer of Value means a direct or indirect benefit (whether money or money's worth) given to a Reportable Recipient by Gilead. The EFPIA Code defines such transfers as follows: *"Direct and indirect transfers of value, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of prescription-only Medicinal Products exclusively for human use. Direct transfers of value are those made directly by a Member Company for the benefit of a Recipient. Indirect transfers of value are those made on behalf of a Member Company for the benefit of a Recipient, or transfers of value made through an intermediate and where the Member Company knows or can identify the HCP/HCO that will benefit from the Transfer of Value."*