

Methodological Note for 2016 Disclosures

Consent

- VPUK chose to work with all HCPs, regardless of whether or not they give their consent to disclose.
- Where VPUK have not received a response on the issue of consent it will be assumed that consent is not given and so all details will be included in the aggregate amounts.
- VPUK has obtained consent once, not for each activity, and for the majority of HCPs this has been given at the same time as contracts signed for the initial activity undertaken with VPUK.
- Consent is total, it is either given and full declarations are made for all activities or it is not and all activities are entered into the aggregate section.
- Change of consent:
 - Withdrawal of consent:
 - If a HCP wishes to withdraw consent for a particular activity, then consent will be withdrawn for all activities and that total will be included in the aggregate amounts.
 - If a HCP withdraws consent at any point then all the information in the previous three years will be included in the aggregate amount, even activity which falls in the period when consent was given.
 - Consent now given
 - If a HCP decides to give consent then activity from that year on shall be declared. Any activity from previous years will be left in the aggregate amounts.

Financial considerations

- Currency conversions are taken at the point of transfer. Where this has been unavailable and conversions have been required, exchange rates have been sourced from xe.com and recorded.
- Amounts include VAT where VAT has been paid.

Criteria for inclusion/exclusion

- The disclosures include no more than is required by the ABPI Code.
- Information declared includes transfers of values that have actually been made, they exclude any planned transfers which HCPs do not complete for whatever reason.
- Transfers of value are declared according to the year in which the actual payment or transfer takes place.
 - Work undertaken in the previous year but paid in the current year will be declared in the current year

- Planned transfers may be accrued into the following year and, if made in the following year, will be declared as a transfer in that year.
- If an agreement covers payments over several years, then each payment will be declared according to the year in which it is actually made.
- Transfers of value include those made by global Vifor Pharma affiliates to UK HCPs.

Other general points

- Fully sponsored delegates come under the category of 'Sponsorship of attendance by HCPs at meetings'
- Where an HCP has benefitted from free registration to a third party meeting where VPUK has not borne any direct cost for that registration (for instance when VPUK has given a HCP a registration pass that has come as part of a sponsorship package), the value attributed to that pass has been the standard entry cost.
- In the interests of transparency, payments that have been made directly to meeting venues and meeting caterers for stand meetings organised by a HCO have been included against the HCO name.
- If any work carried out in the field of R&D this is included within these declared aggregate amounts.

Any questions on the content within this document should be referred to the Compliance Manager, Vifor Pharma UK, The Old Stables, Bagshot Park, Bagshot, Surrey, GU19 5PJ, abpicompliance@viforpharma.com.