

Methodological Notes to Disclosures of Transfers of Value for 2016

ALK-Abelló Ltd

Summary

As an ethical pharmaceutical company, ALK-Abelló Ltd takes very seriously its responsibilities under the ABPI code of practice and therefore has clear standard operating procedures in place for the approval and processing of all transfers of value to healthcare professionals and healthcare organisations.

All requests for support from healthcare professionals and all engagement of healthcare professionals' services undergo a rigorous approval process to ensure the Code of Practice is adhered to.

All transfers of value are recorded in the company's CRM system and ultimately through the SAP accounting system and coded according to category.

Unless organised and paid for by ALK-Abelló Ltd, all contributions towards the costs of events (clause 24) made at the request of healthcare professionals are only paid to hospital, company or charity accounts and not directly to the individual requesting the support. However, for disclosure purposes, all payments are treated as being made directly to the HCP.

Payments for professional services, speaker fees, consultancy etc (clause 24) are made directly to the individual.

Different categories of transfer of value are aggregated per HCP. Itemised details of multiple payments within a category are available on request.

ALK-Abelló Ltd has fulfilled its own tax responsibilities for all transfers of value but is not responsible for the tax obligations of the individuals benefitting from the payments

All figures include VAT where applicable.

Cross Border Payments

ALK-Abelló Ltd is also markets its products in the Republic of Ireland and as such has included declaration of transfers of value to healthcare professionals in this country.

Payments to HCP's in Ireland, payments to UK HCPs utilised as speakers outside the UK and all R&D payments were made in Euro and have been converted to GBP at the rate of 0.86 GBP/Euro. Actual payments made in Euro are available on file.

Apart from the ROI, ALK-Abelló Ltd did not make any other cross border payments to HCP's from other countries.

Globally, ALK-Abelló has an internal SharePoint portal for individual country affiliates to record their cross border interactions with healthcare professionals. This ensures that ALK-Abelló UK can declare transfers of value to UK HCP's from affiliates in other countries. In 2016 this applied to the total R&D payments and 5 UK HCPs utilised as speakers outside the UK. These transfers have been declared in the UK submission. In some case payments were made in Euro. These have been converted GBP at the rate of 0.86 GBP/Euro. Actual payments made in Euro are available on file.

Multi-Year Contracts and Joint Working

ALK-Abelló Ltd has no multi-year contracts in place.

ALK-Abelló Ltd has no joint working agreements in place.

Sponsorships

All payments under 'Contribution to Costs of Events' ALK-Abelló Ltd would define as sponsorships and include costs associated with HCP's attending meetings, training and congresses only

Grants

Throughout 2016 ALK-Abelló Ltd made four unrestricted grants as itemised on the submission form.

Allergy Academy: The Allergy Academy is a programme of training courses organised and run by King's College London for healthcare professionals. Our support is declared on all materials, along with that of other companies and supporting companies attend a stand meeting held in parallel to each course.

Scottish Allergy and Respiratory Academy: Exactly as above but organised by Edinburgh University.

Newcastle University Allergy e-Module: Our support is sufficient for the University to offer 3 bursaries to HCP's to complete the University's Allergy e-module Course. ALK-Abelló Ltd has no input or knowledge of the HCP's who are granted the bursaries. Our only requirement was assurance that the course would continue if our support was withdrawn and that any supported healthcare professionals were not involved in the promotion of specific products.

University of Worcester: Provision of Anaphylaxis Training workshop for Primary Care delegates.

Fees for Service and Consultancy

All transfers of value relating to Service and Consultancy fall into the sub-categories of advisory boards or speaker fees. Details available on file.

Non-Monetary Transfers

There were no non-monetary transfers in 2016

Disclosure Consent

Upon receiving a sponsorship request, ALK-Abelló Ltd writes to the HCP outlining all requirements that need to be fulfilled in order for support to be considered. That letter also contains a statement informing the HCP that, as required by the ABPI, ALK-Abelló Ltd will document and publicly disclose details of transfers of value. In addition, if sponsorship support is agreed, a separate signed disclosure consent form is obtained from the HCP.

Attendance sponsorship is only considered if the HCP professional is prepared to sign a disclosure consent.

Disclosure consent is also obtained through agreements for professional services, consultancy and R&D

The amounts shown in aggregate, where full disclosure has been declined, are all for professional services, consultancy and/or associated travel.

Signed

A handwritten signature in blue ink, appearing to be 'SC' followed by a long horizontal stroke.

Sean Connor

General Manager Benelux, UK & ROI