

**BioMarin Europe Limited 2016 Methodological Note****Disclosure of Payments Made by BioMarin Europe Limited to UK Institutions and Individuals in 2016**

BioMarin Europe Limited and its affiliates<sup>1</sup> worldwide (“BioMarin”) are committed to ensuring that the highest ethical standards are met at all times when interacting with healthcare professionals (“HCP”), healthcare organisations (“HCO”), other relevant decisions makers (“ORDM”), charities, patient organisations, governmental bodies and other third parties it may interact with in order to assist with the appropriate use of medicines, the protection and safety of patients and the general improvement of public health and knowledge and awareness of rare and orphan disorders.

As a member of the Association of the British Pharmaceutical Industry’s (“ABPI”) BioMarin is also fully committed to adhering to the ABPI Code of Practice. As part of the ABPI’s code and the pharmaceutical industry’s desire to be clear and transparent with payments, BioMarin submits its 2016 ABPI disclosure report (“Report”) made pursuant to Clause 24, which discloses payments made to HCPs, HCOs and ORDMs relating to grants, donations, sponsorships, joint working arrangements and consultancies. In addition, BioMarin also discloses its research and development spend for 2016.

This methodological note, which accompanies the report, summarises BioMarin’s approach in calculating and reporting the figures stated in the ABPI central platform submission.

**2016 Calendar Year**

All required transfers of value made in the UK to HCPs, HCOs and ORDMs from January 1, 2016 to December 31, 2016 are disclosed in the Report submitted on the ABPI central platform.

**Research and Development**

BioMarin works in a limited capacity in the United Kingdom with respect to its research and development activities and discloses transfers of value in an aggregate fashion as required by Clause 23.2.

**Definitions**

BioMarin defined relevant terms according to Clause 1, including, but not limited to the definition of health professional (1.4), other relevant decision maker (1.5), healthcare organisation (1.9) and transfer of value (1.10). BioMarin defined and applied said definitions of grants, sponsorship, joint working and consultancy as provided in the Code.

**Data Privacy**

Data privacy law requires that BioMarin obtain consents from individual HCPs prior to disclosing personal

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<sup>1</sup> Payments made to UK-based HCPs and HCOs by BioMarin’s global affiliates are disclosed within the Report regardless of the source of funding.

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data, including transfers of value. BioMarin has obtained consents on a per activity basis. BioMarin has made good faith efforts to secure and retain records of the necessary consents. BioMarin is aware of one HCP who has opted out from the individual disclosure. BioMarin has provided the total spend as an aggregate figure in a separate line entry on the Report. All other HCPs and ORDMs have been disclosed on the basis that permission from individuals was obtained prior to disclosing personal data, such as transfers of value through contractual terms.

#### Meals

Meal transfers of value that were not related to consultancy services are not disclosed in the Report pursuant to Clause 24, but said meals complied with the limitations set forth in Clause 22.

#### Multi-year Projects and Commitments

For multi-year projects and commitments BioMarin declared the amount paid in the 2016 calendar year only. Accordingly, a project or commitment spanning two calendar years and includes several payments during that time will be reported in two years of annual disclosures based on when actual payment was made.

#### Payments to Healthcare Organisations

In some instances an HCO insists that services provided by its employed HCP cannot be contracted and paid to the individual HCP and must be contracted and paid to the HCO. In these instances, BioMarin disclosed the transfer of value under the HCO. In addition, on rare occasions an HCP who provided a service to BioMarin insisted that payment be paid to his or her employing HCO as a charity. While, BioMarin discourages this practice, in the rare instance it occurred BioMarin attributed the payment as a service provided by the HCO.

Payments to third party organisations for services provided by individual HCPs are disclosed in the Report. For example, BioMarin contacts with market research and advertising agencies and vendors for meeting planning services. BioMarin's policy and its Report reflects that all contracted services to an HCP are attributable to BioMarin and are disclosed in the report as if the payment was made by BioMarin.

#### Medical Education Grants to Independent Companies

BioMarin has not disclosed payments made to private companies providing funding for medical education projects where it has had no influence or control over the project/event. In this circumstance, BioMarin would not know the HCP or HCOs involved or to what extent.

#### Currency

Where payments were made in currency other than GBP the exchange rate used was the date of invoice, or alternatively date of record.

#### VAT/Tax

VAT was not included in the disclosure, but taxes (e.g., local tax) relating to accommodation and travel are included.

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