

METHODOLOGICAL NOTES – FERRING PHARMACEUTICALS

General Summary for Disclosure process

1. Transfer of Values to UK HCPs or HCOs by Ferring UK

For all payments that are made to a HCP or HCO, a financial agreement is required to be completed. This agreement contains information required to complete the ABPI financial disclosure template, ie name, address, email address, amount of funding and purpose of the funding.

When the Key Account Specialist requests for a payment, it must be accompanied with a completed and signed financial agreement. The payment request and financial agreement is submitted to the Account Department with authorisation by email from the Line Manager, and with a copy to the relevant Divisional Administrator. Ferring has 4 Divisional Administrators: Medical, Reproductive Health and Growth, Urology & Gastroenterology.

At this stage, if the financial agreement is not complete with all the required information, the Divisional Administrator refers this back to the KAS who requested the payment and asks for full details in order to be able to complete the ABPI financial disclosure form.

Each Divisional Administrator then logs this information onto the ABPI financial disclosure template, ensuring to put the correct amounts in GBP in the relevant columns. Note: any amounts paid in any other currency need to be converted to GBP to input into the disclosure template.

The completed template is sent to the medical division administrator at the end of every quarter.

2. Transfer of Values to UK HCPs or HCOs by Ferring Affiliates outside UK

The Foreign Affiliate has to send details of proposed honoraria, meeting agenda, accommodation, registration fees and contract to the UK Senior Medical Advisor for approval in line with the UK guidelines before agreeing to work with a UK based HCP/HCO. The UK Senior Medical Advisor copies the medical division administrator in the approval email, so all information is available to the medical administrator, for entry into the ABPI disclosure template. The foreign affiliate sends details of the final payment amount and date to the UK Senior Medical Advisor and Medical Administrator. The Medical administrator also sends an email out every quarter to all Foreign Affiliates to ask for details of all relevant payments made to UK HCPs and HCOs.

3. Completion of the ABPI Disclosure template

At the end of the year the disclosure statements for all three divisions are amalgamated into the master ABPI disclosure template by the Medical Division administrator. The information provided by foreign affiliates is also collated and amalgamated with the information from the other three UK divisions by the Medical division administrator. Finally all the amalgamated information input into the ABPI disclosure template is uploaded on to the PMCPA website.

How has consent been obtained?

Consent to provide disclosure information of transfer of values is included as a part of the financial agreement completed by the HCP/HCO.

Tax considerations?

It is the responsibility of the HCP/HCO to inform tax authorities of payments received as transfer of values from Ferring. Ferring is not responsible for providing information to tax authorities regarding payments made to HCPs and HCOs.

VAT (included or not)?

VAT is not included in the payments.

Currency aspects?

- Conversion rates:

All affiliates must provide disclosure payment amounts in pound sterling as per their conversion rate at the time of submitting the disclosure information to UK and also provide their conversion rate on the disclosure template. For Foreign affiliates, their local conversion rate to Pound Sterling has been used in February/March 2016 when the data was input into the ABPI template.

- Cross border payments:

- All payments made to UK HCPs, HCOs, are in Pound Sterling.
- Payments made by affiliates to UK HCPs, HCOs, are made in Pound Sterling, Euros or US Dollars.
- For payments made in GBP, the local affiliates convert the currency using local conversion rates –

For payments made in Euros or US Dollars, the currency is converted to Pound Sterling by Ferring at the time the data is collated, using current conversion rates.

Multi-year contracts:

Only contracts where the payment was actually made in 2016 have been included in the 2016 disclosure. For contracts where the invoices are paid out in 2017, the disclosure will be made in 2018.

Over-the-counter transfers of value? Are they/some included?

According to 2016 Code of Practice, these are not required to be disclosed (clause 1.10). Ferring didn't have any over-the-counter transfers of value.

Medical device transfers of value?

No transfer of values made for medical devices in 2016.

When working with other pharmaceutical companies, how are disclosures handled? How are transfers of value divided amongst the parties (eg ABPI therapy groups, joint working projects etc)?

- (i) Transfer of values to patient organisations will not be disclosed on the ABPI portal (as per 2016 ABPI Code Clause 24.3, 27.7 and 27.8), but the transfer of values will be listed on the Ferring website (as per 2015 ABPI Code Clause 24.7).