

Methodological Note 2016

To be read in conjunction with the PMCPA Disclosure of Transfers of Value Register submitted by Fresenius Medical Care (UK) Ltd.

In preparing Fresenius Medical Care (UK) Ltd. (FMC) disclosures and identifying each category of transfers of value the following considerations have been applied:

- The disclosure of payments made to Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs) and Healthcare Organizations (HCOs) are prior approved via regulatory approval process, provided they meet the criteria's of sponsorship, company organised meeting or use of consultants, which has been developed based on the guidance from the ABPI Code of Practice.
- The recipient of any transfers of value is solely responsible for any tax liability applicable.
- The transfer of values provided on the disclosure template is in all instances the gross amount, which may or may not include Value Added Tax (VAT).
- The value of any transfers has been made in GBP Stirling (£).
- Prior to processing the payments to individual HCPs, ORDMs and HCOs, all recipients have been set up with a vendor account, in order that all payments are made via electronic bank transfer for traceability purposes.
- FMCs disclosures adhere to, but do not transcend, the ABPI Code of Practice.
- Consent to disclosure of transfers of value has been obtained from all relevant HCPs or ORDMs, initially through the signing/returning of individual agreements and subsequently through specific written consent. Where consent has not been obtained from HCPs or ORDMs, the disclosure of transfers of value will be included within the aggregate amount made to such recipients.
- Consent to disclosure of transfers of value made to HCPs has been obtained through the signing/returning of individual agreements.
- Where the payments to HCPs are not made within the same financial year in which the services are contracted and delivered, these will automatically appear on the following years' disclosure template.
- Where payments to HCPs have been stated, the total value as given may include attendance at multiple meetings, together with accommodation/subsistence/travel costs.