

Methodological Note
Orion Pharma (UK) Ltd
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The following information summarises the methodologies used in preparing the disclosures and identifying each category of transfer of value by Orion Pharma (UK) Ltd (Orion UK).

Disclosures made by Orion UK are made in line with the requirements of the ABPI Code of Practice for the Pharmaceutical Industry in the UK. The disclosure contains information on the transfers of value made directly or indirectly to health professionals and healthcare organisations and is set out on the ABPI Disclosure template.

Research and Development (R&D)

The R&D transfer of value has been calculated as payments to healthcare organisations, universities and scientific research organisations and healthcare professions for clinical studies.

The aggregate values for research and development costs was calculated by the Orion UK parent company, Orion Corporation, Orionintie 1A, FI-02200 Espoo, P.O.Box 65, FI-02101 Espoo, Finland. Where R&D payments have been made in GBP, then this figure has been used for disclosure calculations; where payments have been made in Euro, this has been converted to GB Pounds (GBP) based on monthly data provided by the HMRC exchange rate website for 2016:

<https://www.gov.uk/government/publications/hmrc-exchange-rates-for-2016-monthly>

Joint Working

Orion UK has not conducted any joint working initiatives with any other pharmaceutical companies or any healthcare organisations in the UK, so disclosure values for 2016 are purely those of Orion UK.

Consent to Disclosure

Originally in 2016, Consent for disclosure was sought on an ongoing 'per activity' basis. Local written records of consent or non-consent to disclosure payments are maintained by Orion UK. Information on the requirement and intent to disclose payments was provided to all individuals and organisations in advance of any monies being paid. Where individual HCP consent was asked for, but not given; the payments are disclosed on an aggregate basis.

Following the introduction of the General Data Protection Regulation (GDPR) on 25th May 2018, Orion Pharma (UK) Ltd has removed details of those individuals who consented to disclosure, in the manner described above, because the consent was not obtained in line with current GDPR requirements; in this instance payments have been moved to the aggregate section of the disclosure template.

Information Used to Perform Calculations

Values declared include:

- Grants for medical and educational goods and services which enhance patient care, or benefit the NHS and maintain patient care; these payments have been made to healthcare organisations.
- Contracts between Orion UK and institutions, organisations or associations of health professionals under which they have provided a services on behalf of Orion UK.

- Sponsorships of individual UK health professionals and other relevant decision makers in relation to attendance at meetings. Sponsorship in this context includes registration fees and the costs of accommodation and travel.
- Payments to healthcare professionals acting as consultants to Orion UK for services such as speaking at and chairing meetings.

Tax Considerations

All payments to consultants are paid against signed agreements that set out and clarify the relationship between the two parties i.e. Orion UK and the consultant; the agreement states that the consultant is not an employee of Orion and that they are responsible for their own local tax affairs and national insurance contributions that may arise as a result of any payments.

Treatment of VAT

VAT has not been included if it can be recovered by Orion UK in accordance with the VAT regulations.

Currency

Orion UK makes all payments to individuals and organisations using a UK bank account. All payments are made in GBP and the value going through the Orion UK bank account is shown in GBP even if the end recipient chooses to receive payment in a different currency.

We have shown and declared all values in GBP on our return.

Cross Border Payments

Payments to individuals who are not resident tax payers in the UK have been added on to the disclosure of transfer value declarations in their country of residence.

Multi-Year Contracts

All invoices/payments processed through Orion UK accounts in the financial (and calendar) year January to December 2016 are those shown on the disclosure.