

ABPI Disclosure Methodology

This methodological note is intended to help readers understand the disclosure of data regarding Transfers of Value (TOV) to Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs) in the UK during the calendar year 2016 made by Santen UK Limited (Santen). We have summarised below the methodologies used by Santen in preparing our disclosures and identifying each category of TOV.

Santen is a global pharmaceutical company focussed on ophthalmology, but until the end of 2014 there was no UK subsidiary company. Being relatively new to the UK market we had an important need to contract the services of a variety of HCPs to provide us with advice. We also engaged with the ophthalmology community through supporting educational meetings and congresses, which involved TOVs for speakers and for sponsorship of meetings organised by a number of HCOs. A small number of TOVs were made by other parts of Santen during 2016: these were mainly for research and expert advice at the regional level and have been reported as part of the UK disclosure.

Santen did not make any TOVs to patient organisations in the UK during 2016.

We marketed prescription-only medicines and so did not make any TOVs with regard to over-the-counter medicines or devices. We are a member of the ABPI and have closely adhered to the letter and the spirit of the ABPI Code of Practice in all of our activities including transfers of value during 2016. We do not believe that we have gone beyond the Code with regard to TOVs.

Santen UK uses a management tool (CRM) through which all contacts and meetings with HCPs are reported. Using our CRM we have captured and categorised all TOV agreements made in the UK during 2016, including the following details:

- The HCP or HCO who received the TOV
- Period covered by the TOV
- Type of TOV, for example, consultancy, speaker fees, sponsorship and expenses incurred
- Value of the TOV, for example for fees and expenses incurred
- Currency in which the TOV was made
- Date TOV was made
- Whether consent to disclose individual data was gained, or withdrawn
- How the disclosure consent was obtained

The data collected in the CRM have been electronically transferred into a transparency and disclosure tool called NAYA. This tool produces disclosure reports by country of HCP/HCO residence in the required ABPI format.

Please find below some more information to support the understanding of our disclosure:

Contracts with HCPs / HCOs	Contracts in 2016 were signed for each specific service provided, for example attendance at an advisory group meeting or a speaker engagement. There are no multi-year contracts between Santen and HCPs. There is one multi-year contract with a HCO to administer a small educational grant .
'Donations', 'Grants', and 'Sponsorship'	Santen UK made a small number of 'Grants' in 2016 and did not make any 'Donations'. Santen defines these as "one-way" TOVs: for Donations there is no specific purpose defined for the TOV but for Grants there is a specified purpose; in both cases the company would not expect to receive a service in return. Santen provided support to HCPs and HCOs during 2016, and defines 'Service contracts' and 'Sponsorship' as a "two-way" TOV: in return for the TOV Santen received defined service, such as a space at a congress for an exhibition stand, consultancy or lecturing. In line with the ABPI definition of "Sponsorship of Attendance" (Clause 22.5), there is an exception of the "two-way rule" for sponsorship to attend scientific congresses, for which there is no expected service in return.
Obtaining disclosure consent	Santen has encouraged all HCPs who received TOVs to give us their consent to disclose their individual details at the time of the specific TOV, using separate disclosure agreements. This was recorded in our contracts database and our Actis CRM system.
Tax considerations	We do not deduct any taxes from our TOVs, but we make it clear in our HCP contracts that taxes where applicable must be paid by the HCP.
Payments	Disclosure has been made based on the payment date of the TOV. This means that TOV for certain events may be disclosed across two different disclosure periods. For example, any deposits paid in 2016 for events in the next calendar year will appear in the 2016 disclosure, with the balance payable being disclosed in 2017.
VAT	VAT is not paid on fees to HCPs, but is included in the payment of expenses.
Currency	The great majority of our TOVs were paid in sterling, but where TOVs were made in different currencies, these were converted to sterling at the prevailing exchange rate.
Cross-border payments	Other Santen affiliates engaged UK HCPs and HCOs and these TOVs are included in the report. Santen UK engaged HCPs from countries other than the UK and these payments will be reported by Santen affiliates in these countries, in accordance with the Code in the country of residence. The payments were made in the currency of the country of residence.
Non-monetary transfers of value	Santen did not make any non-monetary transfers of value in the UK during 2016.