



ABPI Disclosure Methodological Note

March 2018

This note describes the methods used by Veriton Pharma Limited in the UK to meet its obligations and the requirements for disclosing payments and Transfers of Value (ToV) to Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs) and Healthcare Organisations (HCOs) as outlined in the ABPI Code of Practice for the Pharmaceutical Industry.

Any Transfers of Value made to patient organisations will be disclosed separately on the Veriton Pharma website (www.veritonpharma.com)

Please note that the company changed name its from Special Products Ltd to veriton Pharma Ltd on 2nd October 2017.

Definitions

Transfer of Value (ToV)

The term transfer of value means a direct or indirect ToV, whether in cash, in kind or otherwise, made for promotional purposes or otherwise, in connection with the sale or development of licensed medicines.

Healthcare Professional (HCP)

HCP's include members of the medical, dental, pharmacy and nursing professions and any other persons who in the course of their activities may administer, prescribe, purchase, recommend or supply a medicine.

Healthcare Organisation (HCO)

HCO means either a healthcare, medical or scientific association or organisation such as a hospital, clinic, foundation, university or other teaching institution or learned society whose business address, place of incorporation or primary place of operation is in Europe or an organisation through which one or more HCPs or other relevant decision makers provide services.

Other Relevant Decision Maker (ORDM)

ORDMs particularly include those with an NHS role who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply or use of any medicine but who are not HCPs.

Transfers of Value

Categories disclosed against individual HCPs or ORDMs for ToV made in 2017

- 1) Fees for service and consultancy and associated related expenses agreed in the fee for service/consultancy contract

Veriton Pharma pays fair market value fees for the provision of services provided by HCPs/ORDMs. In 2017 these services included chairing or speaking at meetings arranged by the company. This service provision is documented and agreed via a consultancy/speaker agreement and the fees/associated expenses are disclosed.

- 2) Associated expenses

These may include: travel expenses, accommodation rates (which may include dinner, bed and breakfast, or room only rates) and other associated expenses claimed by the service provider (e.g. parking, any additional appropriate subsistence).

- 3) Payments made to consultants in relation to market research where the identity of the participants is known to Veriton Pharma

Veriton did not make any such ToVs for market research in 2017

- 4) Sponsorship of HCPs/ORDMs for attendance at meetings (including registration fees and associated expenses in the form of travel and accommodation)

Veriton Pharma did not sponsor any individual HCPs/ORDMs to attend third party organised meetings in 2017.

Categories disclosed against individual HCOs for ToV made in 2017

- 1) Fees for service

Fees paid to HCOs for the provision of a service (e.g. consultancy or speaker fees) are reported as fee for service against the relevant HCO

Management of consent disclosure for HCPs/ORDMs

In line with the requirements of the Data Protection Act and the rights of data subject thereunder, Veriton Pharma will only make disclosure of an individual HCP's or ORDM's personal data to the ABPI with the prior written consent of the HCP/ORDM concerned.

Veriton Pharma records consent by asking those HCPs and ORDMs engaged or sponsored by the company to consider signing and returning an agreement which includes a section

for public disclosure. Once returned to Veriton Pharma the agreement is held electronically for at least 3 calendar years unless such HCP/ORDM notifies the company of their wish to subsequently withdraw their consent during this time.

Each HCP/ORDM is entitled to withdraw their consent to disclosure at any time. In such cases, HCPs and ORDMS are asked to send an e mail to info@veritonpharma.com, notifying the company that they wish to withdraw their consent for the current calendar reporting period. Following publication of Veriton's ToV data, HCPs and ORDMS are also able to contact the ABPI to withdraw their consent.

Financial Considerations

Institutions and Private Companies

Where an organisation is principally made up of a group of HCPs, but where ToV cannot be reasonably ascribed to an individual HCP within the organisation, this organisation has been designated an HCO and the ToV disclosed accordingly.

Where an HCP or ORDM runs a private company, Veriton will treat this as if it were an individual HCP/ORDM and will disclose against the individual.

Handling of VAT

In general, Veriton Pharma defines ToV as a cost to the company and hence VAT is excluded from the reported ToVs.

Transactions and currency conversions

All ToVs are disclosed in GBP. Any ToV made in foreign currency is converted using the daily exchange rates in the Veriton Pharma accounting system at the time ToV is applied.

Timing

Veriton Pharma discloses to the ABPI all ToV made between January 1st and December 31st of one year, by the date specified by the ABPI in the following year