



---

## ALNYLAM PHARMACEUTICALS UK 2017 DISCLOSURE METHODOLOGICAL NOTES

Alnylam Pharmaceuticals UK has voluntarily agreed to abide by the PMCPA Code of Practice and supports the efforts of the ABPI to increase transparency in the pharmaceutical industry.

This methodological note is intended to accompany Alnylam Pharmaceuticals UK's disclosure of transfers of value ("ToV") and other benefits in kind made between **4<sup>th</sup> December 2017 and 31<sup>st</sup> December 2017 (inclusive)** to UK HCPs and HCOs. It provides guidance on how Alnylam Pharmaceuticals UK has recorded and reported this data.

---

### Reporting period and date methodology

- In 2017 Alnylam Pharmaceuticals UK is disclosing ToV made between 4<sup>th</sup> December 2017 and 31<sup>st</sup> December 2017 inclusive. This is because Alnylam Pharmaceuticals UK was added to the list of non-member companies who have agreed to abide by the PMCPA Code of Practice on 4<sup>th</sup> December 2017
- ToV will be declared according to the year in which the payment or transfer takes place that is the date of the wire transfer to the recipient occurs as opposed to the date of the event or supporting agreement (i.e., if work was undertaken in December 2017 and a ToV for this work made in January 2018, the ToV will be declared as having taken place in 2018 in the disclosures that will be made in 2019)
- In the event that Alnylam Pharmaceuticals UK books and therefore incurs costs for travel and accommodation for an event that is subsequently cancelled (e.g., due to illness) with the result that the HCP does not 'use' the travel and accommodation, this will not classify as a ToV and will therefore not be disclosed
- For reporting ToV relating to agreements that span multiple years, Alnylam Pharmaceuticals UK will disclose ToV based on date of payment as outlined above

---

### Consent approach

- Alnylam Pharmaceuticals UK intends to collect consent from HCPs to disclose ToV at the first point of first engagement for a three-year period with all HCPs
- Where an HCP runs a limited company for the purposes of receiving private income, ToV to that organization have been disclosed as a ToV to that HCP wherever possible; Where a payment is made to a larger organization (e.g., a university), Alnylam Pharmaceuticals UK will disclose the ToV as a ToV to the organization

- Where an HCP has not provided consent to disclose ToV for all engagements, where Alnylam Pharmaceuticals UK have not received a response on the issue of consent (and it is therefore assumed consent was not given) or where an HCP has withdrawn consent, ToV will be aggregated and disclosed. When declaring aggregated TOV, the total number of HCPs and total aggregated sum will be disclosed
  - HCPs remain free to withdraw their consent for disclosure of data at any time by notifying Alnylam Pharmaceuticals UK in writing and an HCPs decision on consent to disclose will not impact Alnylam Pharmaceuticals UK's willingness to work with them.
    - In the event that an HCP revokes consent prior to publication of data Alnylam Pharmaceuticals UK will update the data and include the ToV for the corresponding HCP as aggregated.
    - In the event that an HCP revokes consent after publication of the data, Alnylam Pharmaceuticals UK will attempt to remove the personal data about ToV of the corresponding HCP as soon as possible
- 

#### **Cross border payments and currency**

- Alnylam Pharmaceuticals UK has included details of cross border ToV from Alnylam Pharmaceuticals UK organizations outside of the UK to UK HCPs
  - All ToV will be declared in British Pounds Sterling (GBP). Where ToV were made in other currencies, Alnylam Pharmaceuticals UK will convert these into GBP using the appropriate monthly exchange rate available on HM Revenue and Customs website
- 

#### **Market research**

- Alnylam Pharmaceuticals UK will disclose payments made in the course of 'non-blind' market research, where it is able to identify the ultimate recipient of the ToV
  - Alnylam Pharmaceuticals UK will not disclose payments made in the course of 'blind' market research, where Alnylam Pharmaceuticals UK is not able to identify the ultimate recipient of the ToV
- 

#### **Research and development**

- For the purposes of disclosure, Alnylam Pharmaceuticals UK considers R&D ToVs as ToVs to HCPs or HCOs related to the planning or conduct of clinical trials and other research and development activities. These amounts will be disclosed in aggregate and not individually
- For clarity, Alnylam Pharmaceuticals UK classifies meetings with pharmaceutical regulators as development activity and so ToVs made for this reason (e.g., fees for HCPs

who attend regulatory meetings as consultants on Alnylam Pharmaceuticals UK's behalf) will be disclosed in aggregate as R&D spend

---

#### **VAT and taxes**

- All ToV have been disclosed excluding VAT (if VAT was applicable)
  - Where payment of taxes are due, they are the responsibility of the recipient of the ToV and not Alnylam Pharmaceuticals UK
- 

#### **Other notes**

- In this reporting period, Alnylam Pharmaceuticals UK had no ToVs relating to OTC medicines and medical devices to disclose and participated in no UK joint workings in this reporting period
  - ToV to patient organizations are not included in this data; Alnylam Pharmaceuticals UK will be making details of its support to patient organizations publicly available in a separate format, as mandated by Clause 27 of the PMCPA Code of Practice
- 

Enquiries relating to Alnylam Pharmaceuticals UK's transparency reports should be addressed to [UKDisclosure@alnylam.com](mailto:UKDisclosure@alnylam.com).