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1. Introduction

Clovis Oncology is committed to comply with laws and regulations that promote transparency around relationships between Healthcare Professionals (HCPs), Healthcare Organizations (HCOs) associated with Transfers of Value (ToVs).

Clovis Oncology perceives collaborative working relationships between HCPs/HCOs and life sciences companies as a positive driver for advancement in patient care and the development of innovative medicines. Indeed, as the primary point of contact with patients, the medical profession has valuable expert knowledge on management of diseases. Therefore, Clovis Oncology perceives having active and compliant working relationships with HCPs and HCOs as being in the best interest of patients. Clovis is committed to disclose its payments for such collaborations in full transparency and in line with all laws and industry regulations that are applicable.

This methodological note intends to define Clovis Oncology methodology regarding ToV reporting for countries with requirements emanating from an industry code.

Countries in Scope: with current market authorization as of November 28th, 2018, Clovis Oncology has reporting requirements in the following countries: Austria, Belgium, Denmark, France, Spain, Portugal and the UK. However, note that Belgium, Denmark, France and Portugal are legal requirements and therefore this methodological note does not apply to them. Therefore, this note focuses on the associated requirements in Austria, Spain and UK.


2. Clovis Oncology methodology and related business decisions

While local associations provide guidance regarding reporting of ToV, some elements need to be decided by the company. Accordingly, in this chapter, Clovis Oncology will define more precisely the elements that are disclosed, and the decisions taken while creating the appropriate reports.

A. Clovis Oncology activities per ToV category

Under the disclosure templates for ToV disclosure, different categories have to be reported. Clovis Oncology identified the following activities in each ToV category defined by the codes:

Category of spend	Details
Donations and grants to HCOs	<ul style="list-style-type: none"> Donations and grants that support healthcare (including in-kind benefits)
Contributions to costs related to events to HCPs and HCOs	<p>Events include all scientific professional meetings, congresses, conferences, symposia and similar events.</p> <p>Costs include:</p> <ul style="list-style-type: none"> Sponsorships agreements Registration fees Travel and accommodation such as: <ul style="list-style-type: none"> Fees for airfare, train, boat or ferry (incl. booking fees) Parking fees, tolls, car rental, taxi transfers

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	<ul style="list-style-type: none"> ○ Drinks and meals ● Rent of booths ● Advertisement space
Fees for services and consultancy to HCPs and HCOs	<ul style="list-style-type: none"> ● Fees for services and consultancy such as speaker fees, training fees, medical writing, data analysis, development of educational materials etc. ● Expenses related to fees for service and consultancy such as: <ul style="list-style-type: none"> ○ Fees for airfare, train, boat or ferry (incl. booking fees) ○ Parking fees, tolls, car rental, taxi transfers ○ Drinks and meals
Research and Development	<ul style="list-style-type: none"> ● Non-clinical (Good Laboratory Practice, GLP) ● Clinical trials from Phase 1 to 4 ● Investigator Sponsored Studies ● Non-interventional studies

B. Reporting period

Clovis Oncology reports data based on the local requirements as follow:

Country	Date of disclosure	Data disclosed
Austria	June 30	Previous calendar year
Spain	June 30	Previous calendar year
UK	March 29	Previous calendar year


C. Direct and indirect spend

Direct transfers of value are defined as payments or in-kind elements made directly by Clovis Oncology to HCPs and HCOs. Indirect transfers of value are made through a third-party vendor on behalf of Clovis Oncology to HCPs and HCOs. In case of indirect payments, Clovis Oncology may not be able to identify the final recipient. If the final recipient is aware that Clovis Oncology is the sponsor, Clovis Oncology requires its vendors to share the HCPs and HCOs transfers of value made and the applicable consent captured in order to report these transfers of value.

D. Consent

Clovis Oncology is committed to complying with both with privacy and transparency requirements and accordingly will aim to collect consent for individual disclosure with all HCPs and HCOs based on local requirements:

- if consent is given for all engagements, Clovis Oncology will disclose all elements in the individual section;
- if consent is not given for all engagements, Clovis Oncology will disclose all elements at an aggregated level, which is in line with EFPIA recommendations to avoid cherry picking;

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- if consent is not captured by Clovis Oncology, Clovis Oncology will default all such transfers of value to the aggregated section of the report.

Revoking individual consent: Clovis Oncology gives HCPs and HCO the option to revoke their consent prior and after the disclosure of its transfers of value data. In this event, Clovis Oncology will include these spend in the aggregated section of the reports.

In case revocation of consent is made after the publication of the data, Clovis Oncology will remove personal data about transfers of value related to that HCP or HCO from the report disclosed, at least by the end of the month following the month of which the request has been received.

E. Events cancelled or HCPs not participating

Clovis Oncology will attribute only transfers of value that can be reasonably associated to an HCP. If a flight or accommodation is booked but the HCP is either unable to attend or the event is cancelled, no transfer of value will be attributed to that HCP.

F. In-kind donations

The transactional value of donations in kind is perceived by Clovis Oncology as applicable transfer of value, which means that this is what will be disclosed (i.e. not the purchasing cost).

G. Cross border interactions

Transfers of value will be disclosed in the country of the principal HCP or HCO practice, professional address or place of incorporation.

H. Multi-year contract

In case of multiple year contracts or activities crossing calendar years, Clovis Oncology will disclose transfers of value based on their date of payment.

I. Rounding

Clovis Oncology rounds every transfers of values to the nearest digit in its transparency reports.

J. Currency


Clovis Oncology discloses transfers of value in the local currency of the country with disclosure requirements. In case of payments made in other currencies than the one required for disclosure requirements, Clovis Oncology will use the actual currency exchange rates based on the date of payment.

K. VAT

Expenses related to events and meetings will be disclosed including VAT. Fees and honoraria consultancy are excluding VAT and recoverable local taxes.

L. Reporting Platforms

Clovis Oncology reports its ToV on central platforms when available and on its website when no central platform exists. If Clovis Oncology does not have a local website, disclosure will be made on its European website.

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M. Out of scope Transfers of Values

Payments to Charity and Third Parties: occasionally, HCPs providing a service to Clovis Oncology may ask for their fee to be paid to a charity of a third party instead. Clovis Oncology typically does not allow this practice, the disclosure of transfers of values is directly attributed to the HCP. It is up to the HCP to transfer the payment upon receipt to a charity of third party. This kind of transaction post-payment is outside of the control of Clovis Oncology.

3. Definitions

Healthcare Professionals (HCPs)	Any natural person that is a member of the medical, dental, pharmacy or nursing professions or any other person who, in the course of his or her professional activities, may prescribe, purchase, supply, recommend or administer a medicinal product and whose primary practice, principal professional address or place of incorporation is in Europe. For the avoidance of doubt, the definition of HCP includes: (i) any official or employee of a government agency or other organization (whether in the public or private sector) that may prescribe, purchase, supply or administer medicinal products and (ii) any employee of a Member Company whose primary occupation is that of a practicing HCP, but excludes (x) all other employees of a Member Company and (y) a wholesaler or distributor of medicinal products.
Healthcare Organizations (HCOs)	Any legal person (i) that is a healthcare, medical or scientific association or organization (irrespective of the legal or organizational form) such as a hospital, clinic, foundation, university or other teaching institution or learned society (except for patient organizations within the scope of the EFPIA PO Code) whose business address, place of incorporation or primary place of operation is in Europe or (ii) through which one or more HCP provide services.
Transfer of Values (ToV)	Direct and indirect transfers of value, whether payments, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of prescription-only Medicinal Products, OTC medicines and food supplements exclusively for human use. Direct transfers of value are those made directly by a Member Company for the benefit of a Recipient. Indirect transfers of value are those made on behalf of a Member Company for the benefit of a Recipient, or transfers of value made through an intermediate and where the Member Company knows or can identify the HCP/HCO that benefit from the Transfer of Value.
Consent to individual disclosure	In some countries, due to privacy reasons, consent of HCPs and HCOs must be captured prior to individually disclose the ToV spend. In case, consent is not given by an HCP or HCO, the spend will still be disclosed be at an aggregated level.
In-kind donations	Transactional value of the materials given to the medical community by Clovis Oncology (these donations are in line with applicable laws and codes)