

Disclosure of Transfers of Value Made in 2018

Methodological Statement

1. Gaining agreement from Healthcare Professionals (HCPs) , Other Relevant Decision Makers (ORDM) disclosure of Transfer of Value (ToV) payments

- All HCPs and ORDMS are sent a Disclosure Consent form to sign on the company's first interaction with them involving a ToV. Agreement for to individual disclosure is assumed for any further interactions unless the HCP/ORDM withdraws that agreement in writing. If the HCP or ORDM does not agree to individual disclosure amounts will be disclosed in an aggregated category.
- Health Care Organisations (HCOs) are informed in their contract that the company will disclose all ToVs to them.

2. Capture of ToV payments:

- All spends which include potential ToV payments to HCPs, ORDMS or HCOs are pre-approved in terms of the reason for, category and value of those payments. This is part of the internal approval process when a meeting or project is being organised.
- Payments are paid per event or activity
- All invoices related to such ToV spends are coded by the project administrator before being submitted to the Finance Department for payment.

3. Collation of ToV payments:

- All TOV spends are collated manually using a centralised spreadsheet
- All payments made in a year to one HCP for multiple events or activities within the same category are collated as one figure under that ToV category. E.g. If an HCP has attended 2 meetings and has 2 registration fees paid this will appear as one figure under the registration fee category
- At the appropriate time a report is produced summarising the ToV spends by category associated with each individual HCP. This is in the format of the ABPI disclosure template.
- A data quality check will be made at the end of this process. To aid this process, all HCPs who have committed to disclose will be sent a courtesy letter informing them of their individual ToV payments which will be submitted. They will be able to contact the company before submission if they have any queries or concerns.

4. Submission of Data

- The data is submitted electronically to the ABPI for uploading onto the central database

- The listed individuals and healthcare organisations will be given the opportunity to check the entries against their name via an email sent to them by the ABPI database partner following submission of the draft data in the ABPI template by the company. Alimera Sciences Ltd will respond to queries raised and submit updates as needed on resolution of the query.

5. Disclosure:

- ToV disclosure is made on the ABPI disclosure template in line with the requirements of the ABPI Code 2016
- Individual disclosure is listed under ToV category and by HCP/ORDM name
- Note that ToVs paid to HCPs/ORDMs for consultancy services are categorised separately from delegate attendance at meetings
- When an HCP/ORDM has declined individual disclosure amounts are listed in the aggregated column
- HCO disclosure is listed by HCO address and ToV category
- Research and Development TOVs (e.g. clinical trials) and subsidiary activities to these (e.g. investigator meetings) are disclosed in an aggregated category

6. Other considerations:

- Payments are presented in GBP
 - Transfer of value is accounted for in the year it is paid, rather than the year the event/activity happened if they are different
 - Consultancy: HCPs/HCOs are paid per event when they have provided services to the company. The disclosure amount listed against an HCP's name is for all consultancy services provided during 2018 and may relate to more than one event.
 - ToV paid by the company is presented exclusive of VAT or other taxes
 - Multi-year contracts have not been employed during 2018
 - In the situation where an HCP is an employee of Alimera Sciences Ltd and still practises their profession part-time in an NHS setting only transfers of value made related to their NHS role will be declared.
 - Cross- border payments have not been made to UK HCPs or HCOs during the calendar year 2018 i.e. UK HCPs are paid only from the UK office
 - When payments are made for invoices arising from outside the UK the currency conversion rate to GBP used is the currency current at time of payment (e.g. payment for hotel accommodation at conferences outside the UK)
 - Alimera Sciences Ltd made no non-monetary transfers of value during 2018.
 - No medical device transfers of value are included as they are not applicable to the Alimera Sciences Ltd
 - No over-the counter transfers of value are included as they are not applicable to the Alimera Sciences Ltd
- No transfers of value have taken place which involve joint working or collaboration with other pharmaceutical companies.

Definitions:

Consultancy: An HCP, other relevant decision maker is engaged to provide a service, either directly by the company, or indirectly by company agents or contractors. This includes speakers at Alimera Sciences Ltd organised meetings and participants in advisory boards. They are paid “fair market value” which is an amount that reflects the complexity of the task and time taken as well as the expertise and status or position of the HCP.

HCP; healthcare professional

HCO; healthcare organisation

MEGS (Medical and Educational Goods and Services): Goods or services provided by the Company to the NHS for which the NHS would normally pay, and which:

a) benefit patient care or

b) benefit the NHS whilst maintaining patient care, or support research

MEGS may take the form of (1) provision of goods or services either in the form of a benefit in kind or by provision of a grant

Examples may include:

- Funding for an HCP who is independent from the company to run a therapy review to identify where potential improvements can be made to patients treatment by their own doctor
- Payment for of an item of equipment for use in a clinic

Sponsorship: Financial or non-financial support for a specific event, activity or item which is organised and / or produced by, or for, an independent third party. In this situation the company has an arm’s length arrangement with the recipient Examples may include:

- Enabling the production of some patient leaflets by a hospital department,
- Enabling a hospital department to run their own educational meeting
- Enabling an HCP to attend a scientific congress