

METHODOLOGICAL NOTES – FERRING PHARMACEUTICALS LTD

General Summary for Disclosure process

1. Transfer of Values to UK HCPs or HCOs by Ferring UK

For all payments that are made to an HCP or HCO, a financial agreement is required to be completed. This agreement contains information required to complete the ABPI financial disclosure template, i.e. name, address, email address, amount of funding and purpose of the funding.

When the Key Account Specialist requests for a payment, it must be accompanied with a completed and signed financial agreement. The payment request and financial agreement is submitted to the Account Department with authorization by email from the Line Manager, and with a copy to the relevant Divisional Administrator. Ferring has 4 Divisional Administrators: Reproductive Health, Urology, Gastroenterology and Commercial.

At this stage, if the financial agreement is not complete with all the required information, the Divisional Administrator refers this back to the KAS who requested the payment and asks for full details in order to be able to complete the ABPI financial disclosure form.

Each Divisional Administrator then logs this information onto the ABPI financial disclosure template, ensuring to put the correct amounts in GBP in the relevant columns. Note: any amounts paid in any other currency need to be converted to GBP to input into the disclosure template.

The completed template is sent to the designated divisional administrator at the end of every quarter.

The Corporate Services Administrator who reports directly to the GM is the lead for the submission of this disclosure.

2. Transfer of Values to UK HCPs or HCOs by Ferring Affiliates outside UK

The Foreign_Affiliate has to send details of proposed honoraria, meeting agenda, accommodation, registration fees and contract to the UK Senior Medical Advisor for approval in line with the UK guidelines before agreeing to work with a UK based HCP/HCO. The UK Senior Medical Advisor copies the lead divisional administrator in the approval email, so all information is available to the administrator, for entry into the ABPI disclosure template. The foreign affiliate sends details of the final payment amount and date to the UK Senior Medical Advisor and Administrator.

The designated administrator also sends an email out every quarter to all Foreign Affiliates to ask for details of all relevant payments made to UK HCPs and HCOs.

3. Completion of the ABPI Disclosure template

At the end of the year the disclosure statements for all four divisions are amalgamated into the master ABPI disclosure template by the lead administrator. The information provided by foreign affiliates is also collated and amalgamated with the information from the other four UK divisions by

the lead administrator. Finally, all the amalgamated information input into the ABPI disclosure template is uploaded on to the ABPI portal.

4. How has consent been obtained?

Consent to provide disclosure information of transfer of values is included as a part of the financial agreement completed by the HCP/HCO with clear GDPR disclaimer.

5. Tax considerations

It is the responsibility of the HCP/HCO to inform tax authorities of payments received as transfer of values from Ferring. Ferring is not responsible for providing information to tax authorities regarding payments made to HCPs and HCOs.

6. VAT (included or not)?

VAT is not included in the payments.

7. Currency aspects?

- Conversion rates:

For payments made in Euros or US Dollars, the currency is converted to Pound Sterling by Ferring at the time the data is collated, using current conversion rates. For the 2018 submission conversion rates of the 22nd March 2019 were used.

- Cross border payments:

- All payments made to UK HCPs, HCOs, are in Pound Sterling.
- Payments made by affiliates to UK HCPs, HCOs, are made in Pound Sterling, Euros or US Dollars.
- For payments made in GBP, the local affiliates convert the currency using local conversion rates

8. Multi-year contracts:

Only contracts where the payment was actually made in 2018 have been included in the 2018 disclosure. For contracts where the invoices are paid out in 2019, the disclosure will be made in 2019.

9. Over-the-counter transfers of value? Are they/some included?

According to 2019 Code of Practice, these are not required to be disclosed (clause 1.10). Ferring didn't have any over-the-counter transfers of value.

10. Medical device transfers of value?

No transfer of values was made for medical devices in 2018.

11. When working with other pharmaceutical companies, how are disclosures handled? How are transfers of value divided amongst the parties (egg ABPI therapy groups, joint working projects etc.)?

Transfer of values to patient organisations will not be disclosed on the ABPI portal (as per 2019 ABPI Code Clause 24.3, 27.7 and 27.8), but the transfer