



**Association of the British Pharmaceutical Industry
Disclosure Methodology
2019**



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1. Data Privacy – Consent for Publication of Data

bluebird bio is requesting consent from all Healthcare Professional (HCPs) and Other Relevant Decision Makers (ORDMs) before declaring a Transfer of Value (ToV) to the individual concerned. If consent is not granted, bluebird will publish the ToV in the aggregated section of the report.

2. Data Privacy – Partial Consent for Publication of Data

If an HCP/ORDM receives a number of transfers of value from bluebird bio and decides not to agree to disclosure of one or more of those transfers of value, bluebird bio will disclose all of that individual's transfers of value in its aggregate amount.

3. Data Privacy – Declaration of Consent

HCPs/ORDMs are informed about the purpose of the ABPI Disclosure Code and the required data processing. The option is provided to HCPs/ORDMs to grant consent for at least one full reporting period or to dissent to the publication of data.

4. Duration of Publication

bluebird bio's report will be available for a period of three years. The report will be amended accordingly, if required, for specific reasons, e.g. legal, etc.

5. Cross-Border Interactions

For HCPs/ORDMs and HCOs, bluebird bio will disclose based on the principal practice address of the identified recipient regardless of where the payment is made.

6. Currency

All payments and transfers of value will be disclosed in local currency per guidance from EFPIA. If a payment is captured in another currency, it will be converted into local country currency based on the date at which the transfer of value occurred and corresponding daily exchange rate.

7. VAT

VAT is excluded for direct payments and included for in kind transfers of value.

8. Transfer of Value Date

bluebird bio used the payment date for direct Fee-for-Service and other payments for activities within the reporting period and applied the event date for all other ToVs like Travel & Lodging. For contracts or agreements with services that span multiple periods, bluebird used the date of payment as the ToV date.



9. Reconciliation of the Data

On an annual basis, bluebird bio will complete a full year reconciliation to identify any transactions that were submitted post data validation or post publication and update the reports accordingly to support the principles of full transparency.