



Methodological Note

In collecting and preparing the information to be used in the submission of transfers of value to Health Care Professional's (HCP's), Other Relevant Decision makers (ORDM's) and Health Care Organisations (HCO's), A. Menarini Farmaceutica Internazionale Srl (AMFI Srl) setup the following processes in order to ensure a robust, accurate and up to date system was developed.

Consent:

- For each activity, consent is requested at the inception of a HCP agreeing to provide services for the organisation. This consent form is stored electronically on a password protected network to ensure data protection is maintained whilst allowing review of records if required in future.
- Should a HCP provide consent for one meeting but decline consent for another, all interactions will be included in the aggregate value. No partial disclosures will be made.
- All transfers of value with no consent to disclose are included in the aggregate value for the organisation.

Collation of data:

- Through the process of recording and authorising the relevant meetings with HCP's, ORDM's or HCO's, consent is or is not obtained as above. Once all relevant meetings have taken place, expense claims are processed onto the in-house ERP system. At the point at which payment is made, the individual record is updated to confirm that all processes have been accurately completed and the relevant record is considered "closed off"
- This along with a specialised internal coding and allocation process ensures that all data is collated for reporting purposes in an appropriate manner and to aid the visibility of all records for audit purposes.
- Where third party membership associations have utilised the service of HCP's, a disclosure has been made based on the appropriate allocated proportion of total costs incurred split by total number of members in association.
- Where a third party arranged for HCP's to travel to educational events and a separate breakdown is unavailable for each individual, a proportion of the total expenditure has been allocated to the HCP this has been disclosed or not depending on the HCP's request for disclosure response.

Reporting Disclosure:

- Through a process of reviewing all internal code allocations, and specific in house financial codes, a detailed data download is performed for all payments made to HCP's, ORDM's and HCO's during the calendar year.
- This data set is then analysed for accuracy and completeness and amalgamated into the relevant sections for disclosure on the ABPI portal.



Points to note in relation to the values declared:

- Menarini Farmaceutica Internazionale did not provide any non monetary transfers of value to any parties during 2019.
- All values reported are the Gross values.
- Any expenses received in a foreign currency have been converted at the rate of exchange ruling on the date shown on the expense claim. Where a date is not know the average conversion rate of 2019 has been used.
- A. Menarini Farmaceutica Internazionale was not involved in any Joint working projects during 2019.