

Spectrum Biomedical UK Ltd. Disclosure 2019- Methodological notes

The ABPI code of practice mandates the public disclosure of certain transfers of value (TOV) made to UK healthcare professionals, healthcare organisations and other relevant decision makers (ORDM). For 2019 all data has been disclosed in an aggregated format to begin with, however we are now able to disclose the full disaggregated data. The disclosure data is published on a central platform, hosted by the ABPI, and made available to anyone who requests access. The ABPI code requirements for disclosure are set out mainly in clause 24.

The methodological notes below explain the data Spectrum Biomedical have disclosed and how the data have been prepared.

TOV categories

- **Registration fees:** Registration fees paid by Spectrum Biomedical to or on behalf of an HCP for attendance at national or international meetings, congresses or courses.
- **Travel and accommodation:** Costs associated with travel, subsistence and accommodation agreed as part of sponsorship paid for by the company to or on behalf of the HCP for their attendance at national or international meetings.
- **Fees:** including speaker, honoraria, consultancy, market research and advisory activities carried out by HCPs or HCOs for or on behalf of the company
- **Related expenses:** Travel and subsistence costs incurred by an HCP while carrying out an engagement on behalf of the company and agreed as part of the sponsorship.
- **Donations, grants and benefits in kind:** following a written request, a donation is a contribution made towards the work of fund raising that an HCO carries out independently of the company. A grant is a contribution of some, or all the costs of an activity carried out by the HCO independently of the company. A benefit in kind is the provision of a service, benefit, technical or administrative given to the HCO as an alternative to a financial contribution.
- **Contribution to the cost of an event:** this may include sponsorship or support for the running of an event by an organisation independent to the company.

VAT and Taxes

- VAT is excluded from all disclosures of TOV. It is up to the individual or organisation concerned that all taxes are paid appropriately. The company is not responsible for the tax arrangement or reporting thereof.

Currency

- all disclosures are made in GBP (£), where the original payment was made in another currency the sum was converted to £ at the prevailing exchange rate at the time of the original payment.

Consent approach

- all HCPs, as part of the contract of agreement received correspondence outlining the company's obligation to transparency as part of the ABPI. It described their rights. Where consent was given, we will disclose all TOV for that individual or organisation. If no consent was given, then the TOV will be aggregated and disclosed.
- To collate disclosure data, records created by relevant departments detailing the amounts paid to HCPs, HCOs and ORDMs at the time of a specific event or request were reviewed and traced to the physical payment to ensure accuracy.

Statement for the disclosure of 2019 data during the COVID-19 pandemic in 2020

As part of the pharmaceutical industry's annual disclosure of transfers of value to HCPs, ORDMs and HCOs via the Disclosure UK platform and in order to ensure accuracy of the published data, the ABPI writes to all of the HCPs, ORDMs and HCOs named in companies' disclosure data ahead of its publication on Disclosure UK at the end of June. (Over 20,000 in June 2019.) To avoid this, and in-line with guidance provided by the ABPI, [COMPANY]'s 2019 transfer of value data has been published on Disclosure UK in aggregate in the first instance. Further to guidance from the ABPI we can now submit the full disaggregate data as laid out by the codes Commitment to transparency. The pharmaceutical industry is committed to preserving the integrity of Disclosure UK and transparency in our interactions with HCPs, ORDMs and HCOs. The ABPI continues to explore how this data will be published and at what time points, depending on COVID-19.