

## **Disclosures of Transfer of Values: Alexion Methodological Note**

Alexion is a member company of the Association of British Pharmaceutical Industry (ABPI). The ABPI code requires disclosures of all Transfers of value made to healthcare professionals (HCPs), other relevant decision makers (ORDMs) and healthcare organisations (HCOs) each annum. This note discloses the methodologies used by Alexion in preparing disclosures in compliance with ABPI Code of Practice.

### Data Privacy

Alexion obtains permission from individual HCPs prior to disclosing individual Transfers of Value to them. The consent obtained is not specific to an activity but applicable to that HCP or ORDM for all transfers of value made in that calendar year. Permission for disclosure is obtained each year.

Where HCPs or ORDMs do not give permission to individual disclosures, Alexion discloses the total amount of all Transfers of Value in the relevant category as an aggregate figure. Where Alexion Pharmaceuticals did not receive a written consent sent to HCPs, all transfers of value for the reporting period will go into the aggregate.

Subsequent to any written consent of disclosure if a healthcare professional states they no longer wish Alexion to disclose any further transfers of value then this will retrospectively apply for the reporting period. All transfers of value for the reporting period will go into the aggregate

For 2019, 41 HCPs/ORDMs provided consent for individual disclosure, 10 HCPs/ORDMs did not provide consent for individual disclosure, and 39 HCPs/ORDMs did not respond to provide written consent. Due to GDPR requirements, we were not able to follow up with contact for 24/39 HCPs and ORDMs who did not provide written consent.

### Transfers of Value

- Registration fee: registration of HCP or ORDM to attend an educational event
- Travel/accommodation: where travel or accommodation is required for the provision of a service, these are disclosed in the category 'Related expenses agreed in the fee for service or consulting contract'. Where there is no provision of services they are disclosed in the category 'Travel and accommodation'.
- Fees: Transfers of Value paid to HCP or ORDM to provide services to Alexion.
- R&D: Any payment related to the transfer of value for Research and Development to UK HCPs or HCOs is declared as an aggregate and not individually.

All Transfers of Value to UK HCPs and ORDMs are disclosed in GBP. Where Transfers of Values are made in another currency, the amount has been converted into GBP using the annual exchange rate before disclosure. Amounts disclosed in GBP may therefore vary slightly from the exact amount paid in the local currency.

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Where a transfer of value is made to a healthcare professional indirectly via a healthcare organisation, if possible Alexion will disclose the transfer of value to the healthcare professional as recommended by article 24.8 of the ABPI code.

Where a contract for any Transfer of Value runs for more than one year, Alexion will disclose any Transfer of Value relating to the contract in the year that Transfer of Value was made.

Alexion discloses the exact amount paid to the HCP, ORDM or HCO. This may include VAT, if included on the invoice. All Transfers of Value made to a UK HCP/ORDM/HCO by Alexion, irrespective of where the Alexion entity is located are included in this disclosure report.