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Methodological Notes to Disclosures of Transfers of Value for 2019

ALK-Abelló Ltd

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Summary

As an ethical pharmaceutical company, ALK-Abelló Ltd takes very seriously its responsibilities under the ABPI code of practice and therefore has clear standard operating procedures in place for the approval and processing of all transfers of value to healthcare professionals and healthcare organisations.

All requests for support from healthcare professionals and all engagement of healthcare professionals' services undergo a rigorous approval process to ensure the Code of Practice is adhered to.

All transfers of value are recorded in the company's CRM system and ultimately through the SAP accounting system and coded according to category.

Unless organised and paid for by ALK-Abelló Ltd, all contributions towards the costs of events (clause 24) made at the request of healthcare professionals are only paid to hospital, company or charity accounts and not directly to the individual requesting the support. However, for disclosure purposes, all payments are treated as being made directly to the HCP.

Payments for professional services, speaker fees, consultancy etc (clause 24) are made directly to the individual unless requested otherwise.

Different categories of transfer of value are aggregated per HCP to give a total payment to that individual. Itemised details of multiple payments within a category are available on request.

ALK-Abelló Ltd has fulfilled its own tax responsibilities for all transfers of value but is not responsible for the tax obligations of the individuals benefitting from the payments

VAT

As most of our payments are to individual HCP's and the majority are not registered for VAT, we have taken the decision to disclose all figures including VAT where applicable.

Cross Border Payments

ALK-Abelló Ltd is also markets its products in the Republic of Ireland and as such has included declaration of transfers of value to healthcare professionals in Ireland.

Payments to HCP's in Ireland, payments to UK HCPs utilised as speakers outside the UK and all R&D payments were made in Euro and have been converted to GBP at the rate pertaining at the time of payment. Actual amounts paid in Euro are available on file.

Globally, ALK-Abelló uses an internal SharePoint portal for individual country affiliates to record their cross border interactions with healthcare professionals. This ensures that ALK-Abelló UK can declare transfers of value to UK HCP's from ALK affiliates in other countries. In 2019 this applied to the total R&D payments only. These transfers have been declared in the UK submission. In some case payments were made in Euro. These have been converted GBP at the rate pertaining at the time of payment. Actual amounts made in Euro are available on file.

Multi-Year Contracts and Joint Working

ALK-Abelló Ltd has no multi-year contracts in place.

ALK-Abelló Ltd has no joint working agreements in place.

Sponsorships

All payments under 'Contribution to Costs of Events' ALK-Abelló Ltd would define as sponsorships and include costs associated with HCP's attending meetings, training and congresses only

Grants

Throughout 2019 ALK-Abelló Ltd made seven unrestricted grants to 3 separate healthcare organisations as itemised on the submission form. These organisations are listed below:

Allergy Academy: The Allergy Academy is a programme of training courses organised and run by King's College London for healthcare professionals. Our support is declared on all materials, along with that of other companies. All supporting companies exhibit at a stand meeting held in parallel to each course.

British Society of Allergy and Clinical Immunology

The BSACI is the national, professional and academic society which represents the specialty of allergy at all levels. Its aim is to improve the management of allergies and related diseases of the immune system in the United Kingdom, through education, training and research.

Newcastle University Allergy e-Module: Funding for 3 bursaries for HCP's to complete the University's Allergy e-module Course. ALK-Abelló Ltd has no input or knowledge of the HCP's who are granted the bursaries nor any input into the course content.

ALK also sponsored a Newcastle University webinar for GPS on venom anaphylaxis. ALK had no input into the content of the webinar or insight into who attended.

Fees for Service and Consultancy

All transfers of value relating to Service and Consultancy fall into the sub-categories of advisory boards or speaker fees. Details available on file.

Non-Monetary Transfers

There were no non-monetary transfers in 2019

Disclosure Consent

Whenever a contract/agreement that results in a Transfer of Value to an HCP or HCO is made a copy of ALK-Abelló Ltd's disclosure agreement is included as part of that contract. This agreement outlines ALK-Abelló Ltd's commitment to total transparency and full disclosure at a named individual HCP and HCO level. However, each HCP/HCO is free to accept or decline disclosure at a named level.

HCPs/HCOs that decline disclosure are included in aggregate. In 2019, 3 individual HCPs out of a total of 55 declined disclosure. The aggregate payment to these individuals was £1,107 compared to total payments to individual HCP of £27,715.10.

Signed

A handwritten signature in black ink, appearing to read 'Sean Connor', written over a horizontal line.

Sean Connor

General Manager Benelux, UK & ROI