

1. PURPOSE

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 the full disaggregated 2019 data can be submitted to Disclosure UK in line with data from previous years.

There has been growing public interest in the nature of the Pharmaceutical industry's relationships with Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs). Critically, the public want to know that such relationships do not unduly influence clinical decisions; that they can trust their HCP to recommend, administer or purchase appropriate care and treatments based solely on clinical evidence, education and experience.

Allergan legitimately engages HCPs and HCOs to provide valuable, independent and expert knowledge derived from their clinical and management experience. This expertise makes an important contribution to our efforts to improve the quality of patient care. It is right that Allergan compensates them for their services and this is one of the legitimate reasons why Allergan transfers value to HCPs and HCOs.

As well as services, Allergan also provides grants and donations to HCOs in response to unsolicited requests to support programmes that cover unmet needs and improve patient care.

Allergan UK Ltd also supports the continuing medical education of HCPs by covering the costs of their fees, travel and accommodation to attend educational events. This responsible sponsorship helps ensure that HCPs are able to provide patients with the best quality of care.

The 'European Federation for Pharmaceutical Industries and Associations' (EFPIA) represents the research-based pharmaceutical industry operating in Europe and it released a 'HCP Disclosure Code' in July 2013. EFPIA's HCP Disclosure Code requires relevant member associations to adopt and translate transparency requirements into national codes for the research based Pharmaceutical industry. The UK's code compels member companies to disclose a report detailing the transfers of value provided to HCPs and HCOs ("Disclosure Reports").

The UK's code also requires member companies to publish a note summarising the method used by the company in preparing its Disclosure Report and identifying transfers of value for each category of spend relating to HCPs and HCOs ("Methodology Note"). This document represents Allergan UK Ltd's Methodology Note for the reporting period 1st January 2019 – 31st December 2019.

2. PRINCIPLES

Allergan is committed to making the transfers of value made to HCPs and HCOs transparent. In making them transparent all reasonable efforts will go into making sure they are accurate, valid and complete.

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Allergan complies with all laws, rules and regulations. Laws in the EU protect the rights of citizens in relation to the way their personal data is processed. HCPs are covered by Data Privacy laws and this affects the way in which Allergan UK Ltd can publish the HCP's transfers of value. Allergan UK Ltd must seek permission (consent) from the HCP or have other legal reasons to individually publish their transfers of value. Equally, confidentiality clauses within contracts with HCOs may prohibit Allergan from disclosing the transfer of value.

Where Allergan UK Ltd has been unable to obtain consent from an HCP or other legal reasons prevent Allergan from disclosing individually for an HCP or HCO, their transfers of values have been added to an aggregate figure within the Disclosure Report. Please see the 'Reportable transfers of value to HCPs/ HCOs' section within this Methodology Note for more information.

3. SCOPE

This Methodology Note applies to the Disclosure Report for Allergan UK Ltd's transfers of value to UK HCPs, other relevant decision makers and HCOs as required by the ABPI for the reporting period 1st January 2019 – 31st December 2019.

The Disclosure Report will be published annually on the central platform for disclosure.

Allergan and AbbVie will maintain separate reporting mechanisms for the reporting of 2019 data.

4. DEFINITIONS

Definitions used within the Disclosure Report and Methodology Note are consistent with the ABPI Code of Practice.

Event

All promotional, scientific or professional meetings, congresses, conferences, symposia, and other similar events, including:

- Advisory board meetings
- Visits to research or manufacturing facilities
- Planning, training or investigator meetings for clinical trials and non-interventional studies (each, an "Event")

organised or sponsored by or on behalf of a company.

Healthcare Professional (HCP)

Anyone that is a member of the medical, dental, pharmacy or nursing professions or in the course of their professional activities, may prescribe, purchase, supply, recommend or administer a medicinal product and whose primary practice, principal professional address or place of incorporation is in the UK. The term also includes persons considered to be other relevant decision makers (ORDM) as per the ABPI Code of Practice.

Healthcare Organisation (HCO)

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A healthcare, medical or scientific association or organisation such as a hospital, clinic, foundation, university or other teaching institution or learned society, or an entity through which an HCP (as defined above) provides its services. As per the ABPI Code of Practice, where a transfer of value is made to a health professional indirectly via a HCO, the transfer will be disclosed once against the individual HCP rather than the HCO.

5. REPORTABLE HCPs AND HCOs

When allowed to do so, the full name, principle place of practice and other details required by the ABPI Code of Practice will be published alongside details of the transfer of value to an HCP. All transfers of value made to the HCP within the reporting period will be added together and within each reportable category and the total value published.

Allergan UK Ltd are only able to declare transfer of value against a named individual if we have received consent to do so from the individual. Where consent has been refused or no response received, then these transfer of value have been included in the aggregate amount (see also Section 6.4.3 Travel and Accommodation). Allergan requested consent to disclose on an individual named basis by way of a separate mailing in 2016, in hard copy format at meetings and electronic means via the sales force in 2017-2019.

The full name, city where registered and principle address will be published alongside details of the transfer of value to an HCO. All transfers of value made to the HCO within the reporting period and within each reportable category will be reported on a transaction by transaction basis.

6. REPORTABLE TRANSFERS OF VALUE

6.1 Research and Development (R&D) transfers of value

These are activities related to the planning or conduct of studies that fall under one of the following categories:

- Conducting non-clinical studies (as defined in the OECD Principles on Good Laboratory Practice)
- Phase I to IV clinical trials (as defined in applicable EU legislation)
- Non-interventional studies

R&D transfers of value will be disclosed in an aggregate form in line with ABPI Code of Practice's requirements.

6.3 Donations and Grants to HCOs

Donations and Grants to HCOs that support healthcare, including donations and grants to institutions, organisations or associations that are comprised of HCPs and/or that provide healthcare.

6.4 Contribution to costs of Events

6.4.1 Sponsorship agreements with HCOs/ third parties appointed by HCO to manage an Event.

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These are the payments that Allergan have made to HCOs/ third parties appointed by HCO to organise Events (see definition). This category includes direct funding such as a sponsorship fee or the right to exhibit a stand. The transfers of value may have been to sponsor these activities:

- Rental of trade fair stands at an event;
- Advertising space (in hard copy, electronic or other format);
- Satellite symposia at a congress;
- Support for a speaker/a faculty;
- Drinks and meals provided by the event organiser, if they are part of the overall package (included in the sponsorship agreement);
- Courses provided by an organisation (but at which Allergan UK Ltd does not select the specific HCP presenting the course).

6.4.2 Registration Fees

Allergan supports the continuing medical education of HCPs by occasionally paying their registration fees and travel/ accommodation to attend medical/ scientific educational Events organised by third parties. Where possible these transfers of value will be disclosed individually in this sub-category (while considering Data Privacy).

Where Allergan has organised an Event directly, only the fees and related expenses paid to HCPs will be included in the Disclosure Report in the category 'Fee for service and consultancy'.

6.4.3 Travel and Accommodation

This sub-category will display the transfers of value for travel and accommodation attributable in relation to supporting HCPs to attend scientific or medical Events. This can include airfares, train tickets, taxis, tolls, parking fees and hotel accommodation.

Transfers of value for travel and accommodation that relate to consultancy services of an HCP at an Event will be disclosed under either the 'Related expenses agreed in the fee for service or consultancy contract...' sub-category or the 'Research and Development' category depending on the nature of the event.

Where HCPs have attended Allergan organised Events and have received transfers of value for travel and/or accommodation (typically this is to attend events regarding the safe and effective use of our products), Allergan have not collected consent to disclose these transfers on an individual named basis. These transfers will be included in the aggregate amounts.

6.4.4 Internal costs for internal events

Costs for internal Events such as rent for space, technical expenses or equipment hire will not be disclosed within the Disclosure Report.

6.5 Fee for service and consultancy

This category will include the fees and any related expenses covered by a consultancy agreement with an HCP. The fee will be reported under the 'Fees' sub-category and any related expenses, such as travel, accommodation or registration fees, will be reported under the 'Related expenses agreed in the fee for service or consultancy contract...'. When it is not possible to separate the fee from the related expenses, in these instances the total transfer of value will be reported in the 'Fees' sub-category.

The 'Fee for service and consultancy' category will include transfers of value relating to Market Research if the identity of the HCP is known by Allergan.

7. ACCOUNTING CONSIDERATIONS

Allergan uses an accounting tool (or Enterprise Resource Planning tool) to record payments made to HCPs and HCOs. The Accounting Tool is a validated system that contains master record of payments made to HCPs and HCOs. The following sections explain how Allergan determines the transfers of value that are included in the report and how they are displayed.

7.1 Currency and Tax

The Disclosure Report will show transfers of value made in GBP. Conversion from local currency to GBP will be carried out at the time of the generation of the report.

The Disclosure Report will show transfers of value made with or without applicable taxes as those are recorded in the Accounting Tool based on the rule of the particular country where the payment was made from.

The values reported in the Disclosure Report filed by Allergan UK Ltd will be the gross value.

7.2 Inclusion Criteria for Payments

A Disclosure Report covers transfers of value from the 01st January – 31st December of the year of the report. The date that Allergan's internal accounting system records the payment having been made will determine which annual Disclosure Report it is included in.

Where a project requires transfers of value to be made in several instalments, the date that the internal accounting system records the payment as having been made will determine within which Disclosure Report the transfer is contained. This may mean that a transfer of value recorded in a Disclosure Report may be a part-payment, with other payments relating to the project being reported in other annual Disclosure Reports.

7.3 Indirect Payments (Payments Made to HCP/ HCO Through Agency)

Allergan UK Ltd may contract with agencies (such as an advertising, marketing or PR agency) that go on to make transfers of value to HCPs. The end recipient (HCP/ HCO) may not appear within Allergan's accounting tool. Allergan UK Ltd makes the best effort to ensure that these transfers of value made on our behalf are captured and reported as if they were made directly by requesting information from our agencies.

7.4 Cross-border Transfers of Value

Transfers of value to HCPs covered by the ABPI Code of Practice may be made by other Allergan entities (and not from Allergan UK Ltd). Allergan UK Ltd works with the other Allergan entities to gather the data so that as complete a picture as possible is provided within the Disclosure Report. Allergan will only publish the transfer of value to an HCP in the Disclosure Report for the country where the HCP has their primary practice.

7.5 Elements that Exceed the Code Requirements

Prescription-Only Medicine (POM), Medical Devices & Over-the-Counter (OTC) Medicine

Allergan manufactures and markets POM, Medical Devices and OTC products. Allergan's accounting tool does not differentiate between transfers of value to HCPs relating to these different types of product and therefore the Disclosure Report will detail all transfers irrespective of the product type they relate to.

8. REFERENCES

ABPI Code of Practice for the Pharmaceutical Industry 2019

9. REVISION HISTORY

Revision Date	Version #	Revised By	Description of Changes
3/24/2016	01	Michael Smith	New version for report on 2015 data
3/29/2017	02	Michael Smith	Revised version for report on 2016 data
3/28/2018	03	Michael Smith	Revised version for report on 2017 data
3/29/2019	04	Kamaldeep Rai	Revised version for report on 2018 data
06/12/2020	05	Michael Smith	Revised version for report on aggregated 2019 data
07/31/2020	06	Michael Smith	Revised version for report on disaggregated 2019 data