

Almirall Ltd

Disclosure 2019

Methodological Note – July 2020

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1. Introduction

Almirall Ltd. is fully committed to transparency in its dealings with Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs), in order to increase trust and transparency and comply with the ABPI Code of Practice requirements for the disclosure of certain Transfers of Value 'ToVs'.

We believe that transparency is key to building and maintaining confidence and trust in us, and in our medicines. We fully support the work being done by associations such as the European Federation of Pharmaceutical Industries and Associations (EFPIA) and the Association of the British Pharmaceutical Industry (ABPI) to improve transparency across the pharmaceutical industry.

Given the unprecedented pressure on the NHS and health care professionals in responding to the COVID-19 pandemic, in April 2020 the ABPI and PMCPA agreed that it would not be appropriate for industry to write to HCPs, ORDMs or HCOs to request that disclosure data be reviewed. In-line with guidance provided by the ABPI, Almirall's 2019 transfer of value data was published on Disclosure UK in aggregate on 2 June. Following the ABPI current recommendations, this is a second submission of the ToVs but this time it is disaggregated where consent was provided.

The Transfers of Value in this report covers all the payments, to the best of our knowledge, made by Almirall in the UK for the 2019 calendar year.

2. Definitions

Recipients: Almirall Ltd. recognises the definition of Healthcare Professional 'HCP', Healthcare Organisation 'HCO', Other Relevant Decision Maker 'ORDM' and Transfer of Value 'ToV' set out in Clause 1 of the ABPI Code of Practice. To access the ABPI Code of Practice click [here](#).

Third Parties: Third parties working for and on behalf of Almirall Ltd. where such parties exist and have provided a ToV on Almirall's behalf have been reported to Almirall and are disclosed as required.

Patient Organisations: Support of and interactions with Patient Organisations are as set out in Clause 27 of the ABPI Code of Practice - full definitions can be accessed by clicking [here](#). Such support and interactions are not included in this disclosure and can be found [here](#).

Research and Development: Almirall Ltd. recognises the definition of Research and Development Transfers of Value set out in the supplementary information of Clause 23.2 of the ABPI Code of Practice. To access the ABPI Code of Practice click [here](#)

3. Disclosure Methodology

ToVs to HCPs have been disclosed where possible against the individual HCP. Where consent has not been provided such ToVs have been disclosed in aggregate.

Where a HCP has consented to some but not all ToVs being disclosed all ToVs have been added to the aggregate category. *See Partial Consent in the Consent Management Section.*

ToVs made to UK HCPs, ORDMs or HCOs by Almirall Head Office and/or other affiliates have been reported to Almirall Ltd. and have been disclosed as required. *See Cross-border Activities below.*

HCPs operating through their own company are disclosed against the HCP.

ToVs to HCOs are disclosed against the individual HCO by activity.

Data was checked for accuracy to the best of our knowledge before publication.

Disclosure of Research and Development Transfers of Value:

Costs that are subsidiary to these activities are included in the aggregate amount.

Thus, Almirall discloses payments agreed with universities and research centres for pre-clinical research as well as clinical trial agreements in hospitals (either direct payments or through a third-party), fees of independent professionals to provide research and development services, and investigator's meeting expenses.

We do not disclose the payments made to companies providing services for research and development (CROs).

4. Categories of Transfers of Value

Full definitions and information on the categories of ToVs required by the ABPI Code of Practice can be found in Clause 24. Please click [on this link](#) to access the ABPI Code

Almirall Ltd. defines and provides donations for corporate or charitable purposes only and as such, donations do not fall into the scope of the Disclosure requirements. In some circumstances such donations may fall into the scope of Clause 27 of the ABPI Code of Practice 'Patient Organisations'. These have been disclosed as required and can be found [here](#).

Benefits in Kind: Almirall Ltd. has not provided any Benefits in Kind in 2019 to HCPs, ORDMs and HCOs.

5. Disclosure Scope

Almirall Ltd. promotes Prescription Only Medicines (POM) as well as products that are registered as Over The Counter (OTC) Products or Medical Devices. As these are all promoted and can be prescribed, Almirall Ltd. does not believe these fall into the excluded disclosure category and has made disclosures against all ToVs for all products irrespective of their registered category.

Free stock of General Sale List (GSL) products is not included in the scope of disclosure.

Note: Whilst Medical Devices do not generally fall into the scope of ABPI Code of Practice, Almirall Ltd. has made the decision to disclose ToVs made for such products in line with the ABPI Code of Practice if / where these products can be both promoted and prescribed.

HCPs working for Almirall Ltd. as employees (full or part time), contracting consultant staff, are not included in the disclosure data, as all such individuals primary occupation is not that of a practicing health professional.

All ToVs taking place in 2019 are disclosed to the best of our knowledge (any data relating to 2019 which was available up to 22nd March 2020 was included in this report).

6. Specific Considerations

ToVs in case of partial attendances or cancellation: Where a partial attendance has been provided this has been disclosed working on a pro-rata basis of the benefit received by the HCP, HCO or ORDM. ToVs that did not ultimately take place or were cancelled are not disclosed as no benefit was received by the HCP, ORDM or HCO.

Cross-border Activities: Where Almirall Global or any other Almirall affiliate provide a ToV to a UK HCP, ORDM or HCO; the respective Almirall entity obtains consent and records the ToV in the Almirall UK Disclosure system.

Country Unique Identifier: Almirall Ltd. aims to maintain an up to date contact database which allows HCPs & ORDMs to have more than one practicing address associated with them, for example when an HCP works at different centres / hospitals etc. For the purposes of disclosure, the database utilised only recognises one address - the principle practice address.

ToVs to forums, networks etc.: Those that have no associated principle practice address have been disclosed using the address of the lead HCP or ORDM etc. for the purposes of disclosure.

Multi-year Contracts: Where agreements, sponsorships and the like fall into more than one year, these are disclosed when any activity is performed, hence payment will be split over several years.

Compassionate Use: Almirall Ltd. does not disclose a Transfer of Value for any medicines provided on request to HCPs for individual patients which come under 'Compassionate Use Supply'.

7. Consent Management

Consent collection: In the spirit of transparency and in compliance with Data Privacy requirements Almirall Ltd. has ensured each agreement with an HCP / ORDM includes a section for the individual to consent to either individual or aggregate disclosure - this is requested for each activity.

Management of recipient data/consent withdrawal: The consent management system enables amendment from individual to aggregate or vice versa and consents are changed manually in the database. This is done via an email inbox specified in the consent/agreement (tovconsentuk@almirall.com). If an HCP / ORDM requests clarification or changes to the disclosed data or consent status Almirall Ltd. will act on the request as appropriate, replying to the HCP / ORDM with the clarification requested or that the change has been implemented. The email from the HCP will serve as proof of withdrawal / change of consent. Disputes on the value of the ToV disclosed will be resolved as quickly as possible and the disclosed data amended where possible and required.

Partial Consent: Almirall Ltd. collects consent on a per-activity basis. Where recipients of transfers of value have decided to disclose as an individual in some activities and aggregate in others, the amount attributable to all transfers is disclosed on an aggregate basis.

8. Financial Information

Currency: All disclosed Transfers of Value data is reported in GBP. Where a ToV has been provided by Almirall Ltd. or a third-party from outside the UK such ToVs are provided in the local currency and converted to GBP using the exchange rate of the payment date.

VAT: VAT is included in the disclosure data, where it applies due to country or event requirements.

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