

METHODOLOGICAL NOTES – FERRING PHARMACEUTICALS LTD

General Summary for Disclosure process

1. Transfer of Values to UK HCPs or HCOs by Ferring UK

For all payments that are made to an HCP or HCO, a financial agreement is required to be completed. This agreement contains information required to complete the ABPI financial disclosure template, i.e. name, address, email address, amount of funding and purpose of the funding.

When the Key Account Specialist requests for a payment, it must be accompanied with a completed and signed financial agreement. The payment request and financial agreement is submitted to the Account Department with authorisation by email from the Line Manager, and with a copy to the relevant Divisional Administrator. Ferring has 3 Divisional Administrators: Marketing, Sales and Medical.

At this stage, if the financial agreement is not complete with all the required information, the Divisional Administrator refers this back to the KAS, Medical Advisor or Product Manager who requested the payment and asks for full details in order to be able to complete the ABPI financial disclosure form.

Each Divisional Administrator then logs this information onto the ABPI financial disclosure template, ensuring to put the correct amounts in GBP in the relevant columns. Note: any amounts paid in any other currency need to be converted to GBP to input into the disclosure template. The completed template is sent to the Medical administrator at the end of every quarter.

2. Transfer of Values to UK HCPs or HCOs by Ferring Affiliates outside UK

The Foreign_Affiliate must input details of proposed honoraria, meeting agenda, accommodation, registration fees and contract into the Polaris system and the UK Senior Medical Advisor is responsible for ensuring the request is in line with the UK guidelines before approving the request from the Foreign Affiliate to work with a UK based HCP/HCO. The lead administrator takes the UK HCP data from Polaris and adds to the annual submission in March due to the smaller volume of interactions with UK HCPs.

3. Completion of the ABPI Disclosure template

At the end of the year the disclosure data for all divisions are amalgamated into the master ABPI disclosure template including the international interactions data from the Polaris system by the medical administrator. Finally, all the amalgamated information is input into the ABPI disclosure template and is uploaded on to the ABPI portal alongside the methodological statement.

4. How has consent been obtained?

Consent to provide disclosure information of transfer of values is included as a part of the financial agreement completed by the HCP/HCO with clear GDPR disclaimer.

5. Tax considerations

It is the responsibility of the HCP/HCO to inform tax authorities of payments received as transfer of values from Ferring. Ferring is not responsible for providing information to tax authorities regarding payments made to HCPs and HCOs.

6. VAT (included or not)?

VAT is not included in the payments.

7. Currency aspects?

- Conversion rates:

For payments made in Euros or US Dollars, the currency is converted to Pound Sterling by Ferring at the time the data is collated, using current conversion rates. For the 2019 submission conversion rates of the 22nd March 2020 were used.

- Cross border payments:

- All payments made to UK HCPs, HCOs, are in Pound Sterling.
- Payments made by affiliates to UK HCPs, HCOs, are made in Pound Sterling, Euros or US Dollars.
- For payments made in GBP, the local affiliates convert the currency using local conversion rates

8. Multi-year contracts:

Only contracts where the payment was made in 2019 have been included in the 2019 disclosure. For contracts where the invoices are paid out in 2020, the disclosure will be made in 2020.

9. Over-the-counter transfers of value? Are they/some included?

According to 2019 Code of Practice, these are not required to be disclosed (clause 1.10). Ferring didn't have any over-the-counter transfers of value.

10. Medical device transfers of value?

No transfer of values was made for medical devices in 2019.

11. When working with other pharmaceutical companies, how are disclosures handled? How are transfers of value divided amongst the parties (egg ABPI therapy groups, joint working projects etc.)?

Transfer of values to patient Organisations will not be disclosed on the ABPI portal (as per 2019 ABPI Code Clause 24.3, 27.7 and 27.8), but the transfer to HCP will be submitted to ABPI disclosure portal for transparency. All patient organisation disclosures will be made available on our website at www.ferringukhcp.co.uk