

# Flynn Pharma Ltd. Transfer of Value

## Methodological Note (2019 Data)

All activities and engagements carried out by Flynn Pharma Ltd. (Flynn) with healthcare professionals (HCPs), other relevant decision makers (ORDMs), healthcare organisations (HCOs) and patient organisations in the UK (and across the wider EU) are both in accordance with, and in keeping with, the spirit of the Association of British Pharmaceutical Industry Code of Practice for the Pharmaceutical Industry, 2019 (the Code). As such, all Transfers of Value (ToV) will be published in accordance with the Code on the ABPI Central Platform.

### Statement for the disclosure of 2019 data during the COVID-19 pandemic in 2020

As part of the pharmaceutical industry's annual disclosure of transfers of value to HCPs, ORDMs and HCOs via the Disclosure UK platform and in order to ensure accuracy of the published data, the ABPI writes to all of the HCPs, ORDMs and HCOs named in companies' disclosure data ahead of its publication on Disclosure UK at the end of June. (Over 20,000 in June 2019.)

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 had agreed that it would not be appropriate for industry to write to HCPs, ORDMs or HCOs at that time, to request that disclosure data be reviewed. Doing so would add additional work for NHS professionals at this time. To avoid this, and in-line with guidance provided by the ABPI, Flynn Pharma's 2019 transfer of value data were published on Disclosure UK in aggregate.

The ABPI has now determined that it is viable to proceed towards disaggregated disclosure before the end of 2020 and, Flynn Pharma will be writing to HCPs, ORDMs and HCO's to give opportunity to review.

### 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 year.

Payments, or payments in-kind, made by Flynn to HCPs, ORDMs and HCOs, will be collated on a secure internal company database.

All ToV will be allocated to one of the categories outlined below:

- Registration Fees; Registration fees paid by Flynn to or on behalf of an HCP associated with their attendance at national or international educational meetings, congresses or courses
- Travel & Accommodation; Costs associated with travel, subsistence and accommodation agreed as part of sponsorship paid by Flynn to or on behalf of an HCP

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- Fees; including speaker honoraria, consultancy fees, fees for market research or advisory activities carried out by HCPs or HCOs for or on behalf of Flynn
- Related Expenses; Travel costs and subsistence incurred by a HCP while carrying out engagements on behalf of Flynn or agreed as part of their sponsorship
- Donations, grants and benefits in kind; following a written request, a '*donation*' is a contribution made towards the work or fund-raising activities that a HCO carries out independent of Flynn. Following a discussion or a request from a HCO, a '*grant*' is a contribution to some, or all, of the costs of an activity that a HCO carries out independent of Flynn. Following a request or discussion with a HCO, '*a benefit in kind*' is the provision of a service, benefit, technical or administrative input given to a HCO as an alternative to a financial contribution (donation or grant); the approximate cost of the benefit in kind (the cost the HCO would reasonably expect to pay) is the value of the ToV recorded
- Contribution to the cost of an event; this may include sponsorship or support for the running of an event by an organisation independent to Flynn

Paperwork associated with all activities will be recorded, checked, stored and made available by Flynn as required by the Code.

In a situation where a payment is made to an organisation (such as a departmental meeting, or research budget/ fund), but is intended for the use of a specific individual, the payment will be recorded and declared as a payment made to that individual.

All payments made by Flynn will be subject to the appropriate local taxes (Flynn is not responsible for the tax arrangement of individuals or organisations or the subsequent reporting thereof in relation to any ToV made by Flynn).

In line with all invoices and payment requests received, Flynn will pay all fees and appropriate local taxes such as 'Value Added Tax' at the specified local rates.

All contracts (both one-off contracts and annual contracts) make clear the intention of Flynn to comply with both the letter, and the spirit, of the Code in relation to the publication of all ToV made during the reporting year as required by the Code.

Multiyear contracts will be reviewed on an annual basis to ensure compliance with the Code and any changes in the reporting requirements relating to ToV.

Where payments are made to groups or individuals in Europe, and paid in Euros (Eu), these payments will be declared in Pounds Sterling (£) on the ABPI Central Platform calculated using a fixed exchange rate for 2019 payments.

Where one of more individuals withdraw their consent or in situations where consent couldn't be obtained, ToV will be declared in aggregate.