

## Methodological Note 2019

### 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 scheduled for mid September.

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. Doing so would add additional work for NHS professionals at this time. To avoid this, and in-line with guidance provided by the ABPI, Fresenius Medical Care (UK) Ltd.'s 2019 transfer of value data was originally submitted to Disclosure UK in aggregate.

Following a subsequent review by the ABPI and PMCPA, it was agreed that it would now be appropriate for industry to write to HCPs, ORDMs or HCOs to request that disclosure data be reviewed and that Fresenius Medical Care (UK) Ltd.'s 2019 transfer of value data now be submitted to Disclosure UK in disaggregate, where possible.

### 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.

### To be read in conjunction with the PMCPA Disclosure of Transfers of Value Register submitted by Fresenius Medical Care (UK) Ltd.

In preparing Fresenius Medical Care (UK) Ltd. (FMC) disclosures and identifying each category of transfers of value the following considerations have been applied:

- The disclosure of payments made to Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs) and Healthcare Organizations (HCOs) are prior approved via regulatory approval process, provided they meet the criteria's of sponsorship, company organized meeting or use of consultants, which has been developed based on the guidance from the ABPI Code of Practice.
- The recipient of any transfers of value is solely responsible for any tax liability applicable.
- The transfer of values provided on the disclosure template is in all instances the gross amount, which may or may not include Value Added Tax (VAT).
- The value of any transfers has been made in GBP Stirling (£).
- Prior to processing the payments to individual HCPs, ORDMs and HCOs, all recipients have been set up with a vendor account, in order that all payments are made via electronic bank transfer for traceability purposes.
- FMCs disclosures adhere to, but do not transcend, the ABPI Code of Practice.
- Consent to disclosure of transfers of value has been obtained from all relevant HCPs or ORDMs, initially through the signing/returning of individual agreements and subsequently through specific written

consent. Where consent has not been obtained from HCPs or ORDMs, the disclosure of transfers of value will be included within the aggregate amount made to such recipients.

- Consent to disclosure of transfers of value made to HCPs has been obtained through the signing/returning of individual agreements.
- Where the payments to HCPs are not made within the same financial year in which the services are contracted and delivered, these will automatically appear on the appropriate years' disclosure template.
- Where payments to HCPs have been stated, the total value is given which may include attendance at multiple meetings.
- To view the disaggregated 2019 disclosure data please visit the ABPI website:  
<http://www.abpi.org.uk>