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ABPI Payment Disclosure 2019

Methodological Note

Galen is a privately-owned pharmaceutical company headquartered in Craigavon, Northern Ireland. Specialising in both branded generics and speciality products, Galen has a sales and marketing presence in the UK and Ireland and supplies products to European markets by out-licensing partnerships with European affiliates. Galen has a presence in the US through Galen US Inc. which was established in 2011 as well as the Nordic regions through POA Pharmaceuticals.

As a UK-based company, Galen is fully committed to adhering to The Association of the British Pharmaceutical Industry (ABPI) Code of Practice for the Pharmaceutical Industry and the European Federation of Pharmaceutical Industries and Associations (EFPIA) HCP/HCO Disclosure Code. These codes require pharmaceutical companies to publicly disclose transfers of value made directly or indirectly to healthcare professionals (HCPs) and healthcare organisations (HCOs) located in Europe.

With regards to Galen's disclosure of payments for 2019, details of the methodology used are listed below.

Payments to Healthcare Professionals (HCPs)

Who are Galen referring to when disclosing payments to Healthcare Professionals?

Any member of the medical, dental, pharmacy and nursing professions and any other persons who in the course of their professional activities may administer, prescribe, purchase, recommend or supply a medicine.

Galen Payments

Payments to HCPs from Galen in 2019 included the following:

- Service fees and fees for consultancy/advisory services
- Travel and accommodation expenses

Service fees and fees for consultancy/advisory services

Galen utilised HCP's as consultants throughout 2019 for the following services:

- Training services
- Participation at advisory board meetings
- Cascade meetings

A written contract was agreed between Galen and the HCPs in advance of the commencement of the above services which specified the nature of services to be provided and the basis for payment for those services. A scope for services was clearly identified in

advance of requesting these services and the criteria for selecting particular HCPs was directly related to the identified need/outcome of the meeting.

Compensation for services reflected the true market value of the services provided. The recruitment of HCPs for the above services were not an inducement to prescribe, supply, administer, recommend, buy or sell any medicine.

Galen have submitted all fees/honoraria to HCPs for services provided in 2019 in the column titled "Fee for service and consultancy (Art. 3.01.1.c & 3.01.2.c & Clause 24) – Fees"

Travel and Accommodation Expenses

These included payments by Galen to cover expenses incurred by HCPs outside of the agreed honorarium to travel and attend meetings/events. Expenses incurred by the HCP such as:

- Car parking
- Tube/train/flight tickets or taxis
- Mileage
- Tolls

In the instance where HCP needs to stay more than one night these fees will include the cost of a standard room in an appropriate venue

These payments can be found in column titled "Fee for service and consultancy (Art. 3.01.1.c & 3.01.2.c & Clause 24) – Travel and accommodation.

Payments to Healthcare Organisations (HCOs)

Who are Galen referring to when disclosing payments to Healthcare Organisations?

Organisations or associations that are comprised of healthcare professionals and/or that provide healthcare or conduct research.

Galen Payments

Payments to HCOs from Galen in 2019 fall exclusively under one category:

- Sponsorship agreements with HCOs /third parties appointed by HCOs to manage an event

Payments Galen have made to sponsor and attend meetings either run by HCOs or appointed third parties can be found in the column titled "Contribution to costs of Events (Art. 3.01.1.b & 3.01.2.a & Clause 24) - Sponsorship agreements with HCOs /third parties appointed by HCOs to manage an Event"



Other important information

VAT

Galen does not place VAT on honorarium fees for HCPs - the fee disclosed is the fee in its entirety. Galen has in some cases used a contracting company to recruit appropriate HCPs for their services. In these instances, the invoice from the contracting company has included a VAT payment which Galen claims back.

Currency Aspects

Galen has provided all payments in GBP (£) – in instances where payments were made to HCPs requiring payment in Euros (€) Galen has made the payment in euros via our company account. Standard conversion rates to GBP were applied to any other currencies at the time of activity and have been disclosed as such.