

## ABPI Disclosure Methodology

This methodological note is intended to help readers understand the disclosure of data regarding Transfers of Value (TOV) to Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs) in the UK during the calendar year 2019 made by Santen UK Limited (Santen). We have summarised below the methodologies used by Santen in preparing our disclosures and identifying each category of TOV.

Santen is a global pharmaceutical company focussed on ophthalmology and the UK subsidiary was set up at the end of 2014. Being relatively new to the UK market, we had an important need to contract the services of a variety of HCPs to provide us with advice. We also engaged with the ophthalmology community through supporting educational meetings and congresses, which involved TOVs for speakers and for sponsorship of meetings organised by a number of HCOs. A small number of TOVs were made by other parts of Santen during 2019 and have been reported as part of the UK disclosure.

Santen made a TOV to two patient organisations in the UK during 2019 and has two active Joint Working Agreements, one of which was disclosed in 2018.

A Transfer of Value of £18,000 was paid to The Newcastle upon Tyne Hospitals NHS Foundation Trust as part of a Joint Working Agreement. Information about this can be found on the Santen website [HERE](#).

We marketed prescription-only medicines and one device so did not make any TOVs with regard to over-the-counter medicines. A small number of TOVs related to devices have been included in our disclosure.

We are a member of the ABPI and have closely adhered to the letter and the spirit of the ABPI Code of Practice in all of our activities including transfers of value during 2019. We do not believe that we have gone beyond the Code with regard to TOVs.

Santen UK uses a management tool (CRM) through which all contacts and meetings with HCPs are reported.

Using this tool, we have captured and categorised all TOV agreements made in the UK during 2019, including the following details:

- The HCP or HCO who received the TOV
- Period covered by the TOV
- Type of TOV, for example, consultancy, speaker fees, sponsorship and expenses incurred
- Value of the TOV, for example for fees and expenses incurred
- Currency in which the TOV was made
- Date TOV was made
- Whether consent to disclose individual data was gained, not given, or withdrawn

The data collected in the CRM have been electronically transferred into a transparency and disclosure tool called ITR. ITR produces disclosure reports by country of HCP/HCO residence in the required ABPI format for the UK.

Where a HCP has given consent to disclose some parts of their TOV individually but consent is either not given or is missing and/or unknown for other parts, Santen has disclosed all TOV in aggregate. The number of HCPs that this applies to in 2019 is 8.

Please find below some more information to support the understanding of our disclosure:

Contracts with HCPs/HCOs	Contracts in 2019 were signed for each specific service provided, for example attendance at an advisory group meeting or a speaker engagement. There are no current multi-year contracts between Santen and HCPs. There is one multi-year contract with a HCO to administer an educational grant and two active Joint Working Agreements. The full Joint Working Agreement TOV and multi-year TOV have been disclosed based on the start date of the agreement (one Joint Working Agreement TOV in 2018, one Joint Working Agreement TOV and the multi-year TOV in 2019). Transfers of value are disclosed according to the date of service from Santen.
'Donations', 'Grants' and 'Sponsorship'	Santen UK made a small number of 'Grants' and 'Donations' in 2019. Santen defines these as "one-way" TOVs: for Donations there is no specific purpose defined for the TOV but for Grants there is a specified purpose; in both cases the company would not expect to receive a service in return. Santen provided support to HCPs and HCOs during 2019, and defines 'Service contracts' and 'Sponsorship' as a "two-way" TOV: in return for the TOV Santen received defined service, such as a space at a congress for an exhibition stand, consultancy or lecturing. In line with the ABPI definition of "Sponsorship of Attendance" (Clause 22.5), there is an exception of the "two-way rule" for sponsorship to attend scientific congresses, for which there is no expected service in return.
Obtaining disclosure consent	Santen requested all HCPs who received TOVs to give us their consent to disclose their individual details at the time of the specific TOV, using separate disclosure agreements. This was recorded in our contracts database and our CRM system.
Tax considerations	We do not deduct any taxes from our TOVs, but we make it clear in our HCP contracts that taxes where applicable must be paid by the HCP.
Payments	Disclosure has been made based on the activity date of the TOV or, in the case of donations, grants and joint working agreements, the start date of the agreement. In previous years, Disclosure has been made based on the payment date, which meant that TOV for certain events could be disclosed across two different disclosure periods. For example, any deposits paid in 2017 for events in the next calendar year would appear in the 2017 disclosure, with the balance payable being disclosed in 2018. The Disclosure for 2019 includes TOV relating to activities undertaken or contracted in 2019 only.
VAT	VAT is not paid on fees to HCPs, but is included in the payment of expenses. Where VAT has been included in payments to HCOs, we have disclosed the VAT as part of the Transfer of Value.
Currency	The great majority of our TOVs were paid in sterling, but where TOVs were made in different currencies, these were converted to sterling at the prevailing exchange rate.
Cross-border payments	Other Santen affiliates engaged UK HCPs and these TOVs are included in the report. Santen UK engaged HCPs from countries other than the UK and these payments will be reported by Santen affiliates in these countries, in accordance with the legislation or industry code in the country of residence. The payments were made in the currency of the country of residence.
Non-monetary transfers of value	Disclosure of non-monetary transfers of value is made at the equivalent value in monetary terms.