

DISCLOSURE OF TRANSFERS OF VALUE TO RECIPIENTS IN THE UNITED KINGDOM IN 2020

METHODOLOGICAL NOTE

General summary

In line with pharmaceutical industry practice, Recordati Rare Diseases UK Ltd (RRD) (formerly Orphan Europe) documents and declares transfers of value made to health professionals, other relevant decision makers, and health organisations in the UK. Details of transfers to recipients in the UK in the calendar year 2020 are disclosed at the central platform for disclosure provided by the Association of the British Pharmaceutical Industry (ABPI).

Recognition methodologies applied

Transfers of value qualifying for disclosure are identified during a payment review process. Each transfer of value is allocated to one of the value categories defined by the ABPI.

Indirect transfers of value to an individual via an organisation are allocated to the individual if the identity of the individual is known. If the identity of an individual is not known, the transfer is allocated to the organisation.

Where the services of an individual have been engaged but the contractual agreement and transfer of value has been made with their organisation with no transfer to the individual, the transfer is allocated to the organisation.

If the identity of an individual cannot be disclosed for legal reasons, the transfer of value is instead disclosed as part of an anonymised aggregate figure. The number of individuals within the aggregate is also disclosed, together with the percentage of all recipients that they represent.

Transfers of value for research and development made to individuals and organisations are disclosed as part of an anonymised aggregate figure for research and development.

Consent to disclose on a named basis

Each time an individual receives a transfer of value from RRD, this is documented within the appropriate contractual agreement which details the transfer and requests confirmation of whether or not they consent to being named publicly as the recipient. If an individual does not consent, their transfer of value is disclosed as part of the anonymised aggregate figure.

Currency and VAT

Where a transfer has been made in a currency other than the Great British Pound (GBP), the GBP equivalent has been determined using the average monthly exchange rate according to the date of the activity. The exchange rate used is available on request. Where VAT is charged, the total amount including VAT is disclosed.

Date of Preparation: 02/03/2021