

## Disclosures of Transfer of Values: Alexion Methodological Note

Alexion is a member company of the Association of British Pharmaceutical Industry (ABPI). The ABPI code requires disclosures of all Transfers of value made to healthcare professionals (HCPs), other relevant decision makers (ORDMs) and healthcare organisations (HCOs) each annum. This note discloses the methodologies used by Alexion in preparing disclosures in compliance with ABPI Code of Practice.

### 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 2020 data can be submitted to Disclosure UK in line with data from previous years.

### Statement for the disclosure of 2020 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 2021.

### Data Privacy

For the purpose of complying with transparency obligations relating to Transfers of Value in the United Kingdom, including disclosures against the Consultant's name and principal practice address on the ABPI's Disclosure Portal, Alexion relies on *legitimate interests* as its grounds for processing Personal Data. Since February 2020 this has been laid out in Appendix 1 of all HCP Service Agreements as part of our Fair Processing Notice.

For 2020, we have no records of any HCPs/ORDMs who have not provided consent for individual disclosure.

### Transfers of Value

- Registration fee: registration of HCP or ORDM to attend an educational event
- Travel/accommodation: where travel or accommodation is required for the provision of a service, these are disclosed in the category 'Related expenses agreed in the fee for service or consulting contract'. Where there is no provision of services they are disclosed in the category 'Travel and accommodation'.
- Fees: Transfers of Value paid to HCP or ORDM to provide services to Alexion.
- R&D: Any payment related to the transfer of value for Research and Development to UK HCPs or HCOs is declared as an aggregate and not individually.

All Transfers of Value to UK HCPs and ORDMs are disclosed in GBP. Where Transfers of Values are made in another currency, the amount will be converted into GBP using the annual exchange rate before disclosure. Amounts disclosed in GBP may therefore vary slightly from the exact amount paid in the local currency.

Where a transfer of value is made to a healthcare professional indirectly via a healthcare organisation, Alexion will disclose the value the transfer in the name of the healthcare professional as recommended by article 24.8 of the ABPI code.

Where a contract for any Transfer of Value runs for more than one year, Alexion will disclose any Transfer of Value relating to the contract in the year that Transfer of Value was made.

Alexion discloses the exact amount paid to the HCP, ORDM or HCO. This may include VAT, if included on the invoice. All Transfers of Value made to a UK HCP/ORDM/HCO by Alexion, irrespective of where the Alexion entity is located are included in this disclosure report.

#### Clinical Research

During 2020 Alexion acquired Portola, they became part of Alexion from 7<sup>th</sup> July 2020. Portola were not an ABPI member company and did not publish transfers of Value in the Disclosure UK portal in the past. Since the date of the acquisition we have incorporated the data from 7<sup>th</sup> July to 31<sup>st</sup> December 2020.

#### HCO Executive Summary

This has been captured here in this document on the page which follows.

## Alexion – 2020 HCO Executive Summary

Newcastle Upon Tyne Hospitals NHS Trust	<p>This payment of £4,500 was for the sponsorship of National Renal Complement Therapeutics Centre (NRCTC) Patient Roadshow arranged by the Newcastle upon Tyne NHS Foundation Trust, which is held each year. The organisers were solely responsible for the setting of the agenda. The benefit the Company receives in return is attendance of two Alexion employees.</p> <p>Additional payments made to NUTH Trust for services carried out where payments were not made to individuals but to the hospital unit where they work.</p>
Healthcare at Home	Healthcare at Home is one of three homecare providers in the UK who Alexion contract with to provide a comprehensive managed homecare service to patients.
Lloyds Pharmacy Clinical Homecare	Lloyds Pharmacy Clinical Homecare is one of three homecare providers in the UK who Alexion contract with to provide a comprehensive managed homecare service to patients.
Alcura	Alcura is one of three homecare providers in the UK who Alexion contract with to provide a comprehensive managed homecare service to patients.
University College London Hospital, Sponsorship of Annual TTP Forum meeting – 27 <sup>th</sup> February 2020	This payment of £3,000 was for the sponsorship of an Annual UK TTP forum meeting arranged by UCL. The organisers are solely responsible for the setting of the agenda. The benefit the Company receives in return is free attendance of up to 4 Alexion employees.
University College London Hospital Charity	This payment of £2,425 was payment for sponsorship of an activity held with the hospital. The organisers were solely responsible for the setting of the agenda.
Central Manchester University Hospitals	Alexion funded, via a grant, to Central Manchester University Hospitals NHS Foundation Trust a maximum of £364,888.80 over a period of 3 years (2018, 2019, 2020), with payments twice a year. This grant was to support the appointment of a designated nurse and a dietitian within the Willink Biochemical Genetics Unit to manage patients with a diagnosis of lysosomal acid lipase deficiency. The final two payments were made in 2020 totalling £123,274.80 (£60,814.80 & £62,460.00).