

# Almirall Ltd

## Disclosure 2020

### Methodological Note – March 2021

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## 1. Introduction

At Almirall we are committed to transparency in our dealings with Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs), to instill trust and transparency, and comply with the ABPI Code of Practice requirements for the disclosure of relevant transfers of value 'ToVs'.

We believe that transparency is key to building and maintaining confidence and trust in us, and in our medicines. We endorse the efforts of the associations such as EFPIA and ABPI in improving transparency across the pharmaceutical industry.

During 2020 the impact of Covid 19 continued to disrupt not only our industry but also it placed significant strain on the NHS, and this impacted how we engaged with our stakeholders such as HCPs and HCOs. Due to the constraints related to face to face interactions, we initiated a reduced volume of engagement activities which in turn translated to us engaging with fewer HCPs and HCOs as compared to previous years. You will notice this change in the volume and value of ToV reported for 2020.

The Transfers of Value in this report covers all the payments, to the best of our knowledge, made by Almirall in the UK for the 2020 calendar year.

## 2. Definitions

**Recipients:** Almirall Ltd recognises the definition of Healthcare Professional 'HCP', Healthcare Organisation 'HCO', Other Relevant Decision Maker 'ORDM' and Transfer of Value 'ToV' set out in Clause 1 of the ABPI Code of Practice.

**Third Parties:** Third parties working for and on behalf of Almirall Ltd where such parties exist and have provided a ToV on Almirall's behalf have been reported to Almirall and are disclosed as required.

**Patient Organisations:** Support of and interactions with Patient Organisations are as set out in Clause 27 of the ABPI Code of Practice. Such support and interactions are not included in this disclosure and can be found [here](#).

**Research and Development:** Almirall Ltd recognises the definition of Research and Development Transfers of Value set out in the supplementary information of Clause 23.2 of the ABPI Code of Practice.

### 3. Disclosure Methodology

ToVs to HCPs have been disclosed against the individual HCP in cases the data subject consented for individual disclosure basis. Where consent has not been provided, such ToVs have been disclosed in aggregate.

Where an HCP has consented to some but not all ToVs being disclosed on an individual basis, all ToVs for the 2020 reporting period have been added to the aggregate category. *See Partial Consent in the Consent Management Section.*

ToVs made to UK HCPs, ORDMs or HCOs by Almirall Head Office (Spain) and/or other affiliates have been reported to Almirall Ltd and have been disclosed as required. *See Cross-border Activities below.*

ToVs to HCPs conducting business through a limited company have been disclosed against the HCP.

ToVs to HCOs are disclosed against the individual HCO by activity.

Data was checked for accuracy to the best of our knowledge before publication.

#### **Disclosure of Research and Development Transfers of Value:**

Costs that are subsidiary to these activities are included in the aggregate amount.

Almirall discloses payments agreed with universities and research centres for pre-clinical research as well as clinical trial agreements in hospitals (either direct payments or through a third-party), fees of independent professionals to provide research and development services, and investigator's meeting expenses.

We do not disclose the payments made to companies providing services for research and development (CROs).

### 4. Categories of Transfers of Value

Full definitions and information on the categories of ToVs required by the ABPI Code of Practice can be found in Clause 24.

Almirall defines and provides donations for corporate or charitable purposes only and as such, donations do not fall into the scope of the disclosure requirements. In some circumstances such donations may fall into the scope of Clause 27 of the ABPI Code of Practice 'Patient Organisations'. These have been disclosed as required and can be found [here](#).

Benefits in Kind: Almirall Ltd has not provided any benefits in kind in 2020 to HCPs, ORDMs and HCOs during 2020.

## 5. Disclosure Scope

Almirall Ltd promotes Prescription Only Medicines (POM) as well as products that are registered as Over the Counter (OTC) Products and / or Medical Devices. Almirall Ltd does not believe these products fall into the excluded disclosure category and as such we have made disclosures against all ToVs for all products irrespective of their registered category.

Free stock of General Sale List (GSL) products are not included within scope for disclosure.

Note: Whilst Medical Devices do not generally fall into the scope of ABPI Code of Practice, Almirall Ltd has made the decision to disclose ToVs made for such products in line with the ABPI Code of Practice if / where these products can be both promoted and prescribed.

HCPs working for Almirall Ltd as employees (full or part time), contracting consultant staff, are not included in the disclosure data, as all such individual's primary occupation is not that of a practicing health professional.

All ToVs taking place in 2020 are disclosed to the best of our knowledge (any data relating to 2020 which was available up to 15<sup>th</sup> March 2021 was included in this report). For pending invoices related to events that took place during 2020, all invoices paid up to 15<sup>th</sup> March 2021 have been included in the 2020 disclosure.

## 6. Specific Considerations

**ToVs in case of partial attendances or cancellation:** There were no cases of partial attendance and therefore these have not been reported in the 2020 disclosure. ToVs that did not ultimately take place or were cancelled are not disclosed as no benefit was received by the HCP, ORDM or HCO.

**Cross-border Activities:** Where Almirall Global or any other Almirall affiliate provide a ToV to a UK HCP, ORDM or HCO; the respective Almirall entity obtains consent and records the ToV in the Almirall UK Disclosure system.

**Country Unique Identifier:** Almirall Ltd aims to maintain an up to date contact database which allows HCPs & ORDMs to have more than one practicing address associated with them, for example when an HCP works at different centres / hospitals etc. For the purposes of disclosure, the database utilised only recognises one address - the principle practice address.

**ToVs to forums, networks etc.:** Those that have no associated principle practice address have been disclosed using the address of the lead HCP or ORDM etc. for the purposes of disclosure.

**Multi-year Contracts:** Where agreements, sponsorships, and the like fall into more than one year, these are disclosed when any activity is performed, hence payment will be split over several years.

**Compassionate Use:** Almirall Ltd does not disclose a ToV for any medicines provided on request to HCPs for individual patients which come under 'Compassionate Use Supply'.

**CRM Transition:** During 2020 Almirall Ltd transitioned from our previous Customer Relationship Management (CRM) system to our current CRM system (VeevaCX). Care has been taken to ensure data from the legacy system has been migrated accurately and additional validating work has been completed to ensure the integrity of the data. The data is accurate to the best of our knowledge based on work performed.

## 7. Consent Management

**Consent collection:** In the spirit of transparency and in compliance with GDPR requirements Almirall Ltd has ensured each agreement with an HCP / ORDM includes a section for the individual to consent to either individual or aggregate disclosure; this is requested for each activity.

**Management of recipient data/consent withdrawal:** The consent management system enables amendment from individual to aggregate or vice versa and consents are changed manually in the database. This is done via an email inbox specified in the consent/agreement ([tovconsentuk@almirall.com](mailto:tovconsentuk@almirall.com)). If an HCP / ORDM requests clarification or changes to the disclosed data or consent status Almirall Ltd will act on the request as appropriate, replying to the HCP / ORDM with the clarification requested or that the change has been implemented. The email from the HCP will serve as evidence of withdrawal / change of consent. Disputes on the value of the ToV disclosed will be resolved as quickly as possible and the disclosed data amended where possible and required.

**Partial Consent:** Almirall Ltd collects consent on a per-activity basis. Where recipients of transfers of value have decided to disclose as an individual in some activities and aggregate in others, the amount attributable to all transfers is disclosed on an aggregate basis.

## 8. Financial Information

**Currency:** All disclosed ToV data is reported in GBP. Where a ToV has been provided by Almirall Ltd or a third-party from outside the UK such ToVs are provided in the local currency and converted to GBP using the exchange rate of the payment date.

**VAT:** VAT is included in the disclosure data, where it applies due to country or event requirements.

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