

## **Methodological Note 2020**

### **Statement for the disclosure of 2020 data during the COVID-19 pandemic in 2020/2021**

As part of the pharmaceutical industry's annual disclosure of transfers of value to Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs) and Healthcare Organizations (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 scheduled for 30 June 2021.

Following a subsequent review by the ABPI and PMCPA of the current pressure on the NHS and health care professionals in responding to the COVID-19 pandemic, it was agreed that it would be appropriate for industry to write to HCPs, ORDMs or HCOs to request that disclosure data be reviewed and that Fresenius Medical Care (UK) Ltd.'s 2020 transfer of value data be submitted to Disclosure UK in disaggregate, where possible.

### **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.

### **To be read in conjunction with the PMCPA Disclosure of Transfers of Value Register submitted by Fresenius Medical Care (UK) Ltd.**

In preparing Fresenius Medical Care (UK) Ltd. (FMC) disclosures and identifying each category of transfers of value the following considerations have been applied:

- The disclosure of payments made to HCPs, ORDMs and HCOs are prior approved via regulatory approval process, provided they meet the criteria's of sponsorship, company organized meeting or use of consultants, which has been developed based on the guidance from the ABPI Code of Practice.
- The recipient of any transfers of value is solely responsible for any tax liability applicable.
- The transfer of values provided on the disclosure template is in all instances the gross amount, which may or may not include Value Added Tax (VAT).
- The value of any transfers has been made in GBP Stirling (£).
- Prior to processing the payments to individual HCPs, ORDMs and HCOs, all recipients have been set up with a vendor account, in order that all payments are made via electronic bank transfer for traceability purposes.
- FMCs disclosures adhere to, but do not transcend, the ABPI Code of Practice.
- Consent to disclosure of transfers of value has been obtained from all relevant HCPs or ORDMs, initially through the signing/returning of individual agreements and subsequently through specific written consent. Where consent has not been obtained from HCPs or ORDMs, the disclosure of transfers of value will be included within the aggregate amount made to such recipients.
- Consent to disclosure of transfers of value made to HCPs has been obtained through the signing/returning of individual agreements.

- Where the payments to HCPs are not made within the same financial year in which the services are contracted and delivered, these will automatically appear on the appropriate years' disclosure template.
- Where payments to HCPs have been stated, the total value is given which may include attendance at multiple meetings.
- To view the disaggregated 2020 disclosure data please visit the ABPI website:  
<http://www.abpi.org.uk>