

Proveca Ltd. Transfer of Value Disclosure 2021

Methodological Note

Introduction

Proveca Ltd. engages healthcare professionals (HCPs), other relevant decision makers (ORDMs), healthcare organisations (HCOs) and patients' organisations across Europe to obtain independent and expert advice to ensure high standards of patient care. Such engagements include but are not limited to research and development, educational and training events, advisory board meetings and attendance at conferences including promotional activities.

Proveca Ltd. has agreed to comply with the ABPI Code of Practice to document and publicly disclose payments or other transfers of value made directly or indirectly to HCPs, ORDMs and HCOs. This note describes Proveca Ltd's method of disclosure of Transfer of Value (ToV) for 2021 in accordance with the requirements of the ABPI code.

In 2021, we chose to review all payments made by our UK team to external sources. The relevant payments for disclosure, as per the ABPI 2021 Code of Practice, were identified. These payments and all the invoices for these payments were reviewed and added appropriately to the supplied Disclosure UK spreadsheet provided. The spreadsheet was checked for validation appropriately prior to submission.

With regards to contracts, the ToVs in this disclosure only relate to contracts for one-off services. There were no long-standing agreements with HCPs.

Currency aspects and Value Added Tax (VAT)

The predominance of all ToV were made in Pound Sterling (£). Where ToV were made in Euros (€), amounts were converted to Pound Sterling (£) based on currency conversion (1 EUR = 0.837752 GBP) on the date which the conversion calculation was made on 21 March 2022. No other currencies were used for ToV in 2021.

For payments made to HCOs, payments are declared in Pound Sterling (£) and values disclosed do not include VAT.

For payments made to HCPs, payments are declared in Pound Sterling (£) and the values disclosed are the full payment.

Consent for individual vs. aggregate reporting

During the last year, it was noted that the ABPI had provided guidance for disclosure related to *Legitimate Interests*. (ABPI document code REP-0056-0616)

Proveca Ltd. has taken the decision to follow this guidance and change from a procedure of requesting consent from HCPs to disclose their payments.

Therefore during 2021, HCPs who had already requested that their payments be disclosed in an anonymised aggregated fashion (or not) had their wish respected. For those HCPs where a decision was needed on disclosure following the agreement to follow the Legitimate Interests policy, the HCPs

Date of preparation: March 2022

were informed in-line with that policy and consent for a named disclosure was made unless an objection was raised by the HCP.

Categories of disclosure

Donations and Grants to HCOs

Following a written request, a **'donation'** is a contribution made towards the work or fund-raising activities that a HCO carries out independent of Proveca.

Following a discussion or a request from a HCO, a **'grant'** is a contribution to some, or all, of the costs of an activity that a HCO carries out independent of Proveca.

Following a request or discussion with a HCO, **'a benefit in kind'** is the provision of a service, benefit, technical or administrative input given to a HCO as an alternative to a financial contribution (donation or grant); the approximate cost of the benefit in kind (the cost the HCO would reasonably expect to pay) is the value of the ToV recorded.

Contribution to costs of Events

Sponsorship agreements with HCOs/ third party organisations: The provision of financial support to a HCO as part of running an event.

Registration Fees: Registration fees paid by Proveca on behalf of a HCP or for Proveca staff members, associated with their attendance at national or international meetings, conferences or courses.

Travel & Accommodation: Costs associated with travel, subsistence and accommodation agreed as part of sponsorship paid to or on behalf of a HCP associated with their attendance at national and international educational meetings, conferences or courses.

Contracted Services

Fees: including speaker honoraria, consultancy fees, fees for market research or advisory activities carried out by HCPs or HCOs for or on behalf of Proveca.

Expenses: Travel costs and subsistence incurred by a HCP while carrying out engagements on behalf of Proveca or agreed as part of their sponsorship.

Non-monetary ToV

There were no non-monetary ToV made to other relevant parties in 2021.

Joint working ToV

There were no joint working agreements in 2021.

Research and Development ToV

Transfers of Value to HCPs or HCOs related to Research and Development were disclosed in an aggregate fashion and as required by Clause 1.20 of the ABPI Code of Practice.

Date of preparation: March 2022

Incorrect Additional Payments to HCOs:

During the process of submitting the disclosure for 2021, we identified that some payments made to HCOs were incorrect on multiple occasions. We are in the process of requesting refunds for these, however we have not received all the refunds as of 30-Mar-2022. Hence, we have included any incorrect additional payments in this disclosure.