

Reporting of Transfers of Value - Methodological Note

Dr Falk Pharma UK is committed to the promotion of research, scientific exchange and the development of medicines. We promote shared learning between communities of patients, clinicians and researchers. The shared knowledge helps Dr Falk to develop treatment options that work for our patients and lead to successful disease treatment.

In the pursuit of shared learning, we organise and sponsor continuing medical events across the UK and Ireland as well as supporting the work of patient organisations.

The relationship between the pharmaceutical industry and healthcare professionals (HCPs) and healthcare organisations (HCOs) is vital for the development and delivery of life-enhancing and lifesaving medicines. All collaborators want to ensure that patients and others have confidence that the relationship between pharmaceutical companies and the doctors, nurses, pharmacists and other health professionals and organisations is open and transparent. Dr Falk Pharma UK Ltd discloses details of payments and other benefits in kind made to HCPs and HCOs. This information is published on a database called Disclosure UK.

The methodological notes below explain the data Dr Falk Pharma UK Limited disclose and how the data is prepared.

Transfer of Value Data included:

The data disclosed by Dr Falk Pharma UK Limited is consistent with the requirements of the current ABPI Code of Practice.

Support of health professionals to attend educational events

The data includes all travel costs and accommodation costs but does not include food and drink costs. The data also includes the registration fee, where applicable, for the health professional to be registered to attend the educational event.

Payment of consultants who provide services to Dr Falk Pharma UK Ltd

The data includes payments to health professionals who provide services to Dr Falk Pharma UK Ltd. Where applicable, the data also includes payment of expenses to consultants in the delivery of their services, such as travel expenses or accommodation expenses, in line with the current Code of Practice.

Payments to charity and HCO as fees

On occasion, a HCP who has provided a service to Dr Falk Pharma UK Ltd may ask for their fee to be paid to charity or to the HCO where they are employed. On these occasions, or similar, the fee received by the HCP will be disclosed under that HCP's entry.

Payments to non-UK HCPs or HCOs

Dr Falk Pharma UK Ltd operates in both the UK and Ireland. All payments made by Dr Falk Pharma UK Ltd in the UK or Ireland are declared.

Where non UK / Ireland HCPs and members of the public have been paid for a service, where appropriate, their details have been passed to our Dr Falk colleagues worldwide for disclosure in the relevant territory.

Donations, grants and benefits to health care organisations & patient groups

The data includes transfers of value to UK health care organisations. The provision of equipment or materials by Dr Falk Pharma UK Limited for specific projects and / or any time spent in lieu of funding is calculated and the value assigned as a donation.

Funding towards a purpose of which Falk have no input or influence, and receive no benefit is a grant. Support is declared where appropriate.

Sponsorship

The data includes transfers of value to UK health care organisations such as the provision of meeting organisation services by Dr Falk Pharma UK Limited or payment to support educational meetings or projects that enhance patient care or benefit the NHS and maintain patient care. Support is declared on materials relating to the specific event or programme.

Patient Organisations and Charities

Patient organisations are providers of essential support and information to those living with medical conditions, as well as their families and carers. Working with these valued organisations allows Dr Falk Pharma UK Ltd to support their efforts with vital resources. Transfers of value to support non HCO's, such as patient organisations and charities are subject to separate disclosure and are therefore excluded.

Notable exclusions

Consultants that do not work in healthcare e.g. soft skills trainers, are considered to fall outwith the scope of the code, and their transfer of value, either as consultant fees or as a donation to a HCO are not included.

Reporting Date

There is an inevitable delay between the date of agreement and the date on which the payment is made. Dr Falk Pharma UK Ltd. will disclose the date the payment was made and not the date the activity was conducted.

<u>VAT</u>

The value reported is the total amount paid by Dr Falk, including VAT where applicable.

Currency

Disclosures are made in pounds sterling (\pounds). Where the original payment was made in another currency, the value was converted to pounds at the exchange rate prevailing at the time of the payment.

Privacy/GDPR and Lawful Basis for processing.

For the purposes of Disclosure UK, between January 1st and August 31st 2022, Dr Falk Pharma UK Ltd used consent as its lawful basis for processing. From September 1st 2022 Dr Falk used Legitimate Interest as our legal basis for processing. Individuals were notified of the upcoming change by a website landing page and an updated Privacy Policy detailing Dr Falk's strong belief that there is a legitimate public interest in better understanding the financial relationships that individuals may have with us, therefore in the interests of transparency and trust in the pharmaceutical industry we no longer seek consent from individuals to disclose their transfers of value.

For 2022 only, if a HCP received a transfer of value before 1st September 2022, and refused consent, then all payments made to that HCP during the year, whether before or after Sept 1st, will be included in the aggregate spend.

Where a HCP has received a transfer of value after 1st September 2022, and successfully challenged the balance of legitimate interest with their rights and freedoms, their payments will be included in the aggregate spend.

Retention of data

Dr Falk Pharma UK Ltd retains records of accounts according to UK law.