

This Methodological Note is for 2022 Transfers of Value (ToV) (reported 2023)

Methodological Note

Transparency is fundamental to ensure a positive working relationship between the pharmaceutical industry and healthcare providers, relationships that best serve the interests of patients.

Neuraxpharm (Neuraxpharm or the 'Company') has prepared this document to outline the Company's interpretations and assumptions made and methodologies used in complying with the requirements to disclose payments to Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs) under the Code of Practice 2021 administered by the Prescription Medicines Code of Practice Authority (PMCPA).

Consent

Neuraxpharm has sought consent from all HCPs to disclose ToVs on an individual basis, naming the recipient and identifying the ToV. Neuraxpharm has included a clause in its contractual templates to this effect. For each activity, consent to disclose is requested at the inception of a HCP agreeing to provide services for the Company. This consent is stored electronically allowing a review of records if required in the future.

The individual HCP included in the 2022 disclosure gave their consent to disclose, however, should a HCP have provided consent for one meeting and not for another, all interactions with the HCP would have been included in the aggregate value and no partial disclosures made.

In circumstances where a HCP declines to give, or subsequently withdraws consent to disclose on an individual basis of ToV during the reporting calendar year all ToVs with no consent to disclose are included in the aggregate value.

In the case of HCOs, no consent is required to disclose ToVs against a named organisation in the UK. If more than one interaction occurred between Neuraxpharm and an HCO the ToVs are included as an aggregated value for the named organisation.

What is a Transfer of Value (ToV)?

The ToVs data is based on any direct or indirect ToV, whether monetary, benefit in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and/or sale of prescription only medicinal products for human use.



A ToV can be salary, fee or remuneration for a service provided by the HCP or HCO to Neuraxpharm. Expenses incurred during the execution of the service (e.g. travel and accommodation) are also considered ToV. Donations and sponsorships provided by Neuraxpharm are also considered to be ToV.

This includes, but is not limited to, payments of fees for services, consultancy and associated expenses, registration fees, sponsorships, grants, donations, travel, accommodation.

Examples of Transfers of Value covered under Fee for Service and Consultancy agreements:

- Speaker fees
- Webinar Faculty
- Development of case studies
- General consulting/advising
- Chairing and speaking at meetings

Who is the recipient of the ToV?

Neuraxpharm will consider the recipient to be the contracting entity. Hence the contracting party as stated on the legal contract executed between Neuraxpharm and the counterpart will be reported as the recipient.

In several instances ToVs between Neuraxpharm and a HCO went directly from Neuraxpharm to the venue or the caterer for the activity rather than via the HCO itself. This occurred for the following activities/HCOs:

- WENF Epilepsy Specialist Nurse Association (ESNA) meeting
- SWENG Epilepsy Specialist Nurse Association (ESNA) meeting
- Epilepsy Specialist Nurse Association (ESNA) meeting

How have the ToVs been validated?

Neuraxpharm has made reasonable efforts to ensure the completeness and accuracy of the ToVs made between individual HCPs and HCOs by reviewing relevant documentation including contracts and invoices.

When are ToVs disclosed?



The Company has made its disclosures relating to cash payments by reference to the payment date. As a consequence, a fee for a service provided during 2021 and paid during 2022 would be registered on the 2022 ToV listing. If the exact date for a specific transfer cannot be obtained by the individuals registering the ToVs, the transfer is to be registered as close as possible to the actual payment date.

Payments made after December 31, 2022 for events that took place in 2022 will be included in the 2023 report.

Currency

The Company has made its disclosures in sterling.

The Company has made its disclosures relating to direct ToVs exclusive of all applicable taxes.

Date of Preparation: February 2023