

SIFI 2022 Transparency Disclosure Methodological Notes

SIFI is a member of ABPI, and committed to ensure that the nature and scope of transfers of value with Healthcare Professionals (HCPs) and healthcare organizations (HCOs) are transparent to the public. SIFI has published the applicable transfers of value provided directly or indirectly to HCPs and/or HCOs for the year 2022. This methodological note provides insight in how SIFI has recorded and reported this information in according to the ABPI transparency code.

Reporting period:

The SIFI 2022 disclosure report includes applicable Transfers of value provided between 1 January 2022 and 31 December 2022.

Consent Approach:

To satisfy the reporting requirements of the ABPI, SIFI complied with the governing data protection laws of the United Kingdom. SIFI will publish the total value of the Transfers of value for HCPs and HCOs, as appropriate that have provided their consent for such disclosure.

HCPs or HCOs, as appropriate, not providing consent will have their amounts included in an aggregate amount published per ABPI requirements.

Cross borders interactions:

SIFI affiliates (worldwide) that have provided United Kingdom HCPs/HCOs with a reportable Transfer of value have been included.

Transfer of value Definitions:

HCP Transfer of value Definition, such as:

- Fee for Service and Consultancy
 - Speaking fee (including associated preparation work)
 - Advisory Boards and other consultancy engagements (including associated preparation work)
 - Educational/Scientific Events
- Related expenses agreed in the Fee for Service or consultancy contract, such as:
 - o Flights
 - \circ Hotel
 - Other transportations costs
- Contribution to cost of events e.g. sponsorship for registration fees, travel and accommodation, such as:
 - Congress/Meeting registration
 - o Flights
 - \circ Hotel
 - o Other transportations costs (mileage, train, taxi, bus, underground, parking)

HCO Transfer of value Definition, such as:

- Fee for Service and Consultancy
 - Speaking fee (including associated preparation work)
 - Advisory Boards and other consultancy engagements (including associated preparation work)
 - o Educational/Scientific Events
- Related expenses agreed in the Fee for Service or consultancy contract, such as:
 - o Flights
 - o Hotel
 - Other transportations costs
- Contribution to cost of events e.g. sponsorship for registration fees, travel and accommodation, such as:
 - Congress/Meeting registration
 - Flights o Hotel o Other transportations costs (mileage, train, taxi, bus, underground, parking)
 - Sponsorship agreements with HCOs / third parties appointed by HCOs to manage an event, such as part funded independent education events.

Date Methodology:

SIFI followed the date methodology when determining which Transfers of value are in scope for the current reporting cycle: Event Date is defined as the date the expense occurred. Transfer of value related to the following categories

Exchange Rate:

Where transfers of value were captured in foreign currency, amounts were converted to local currency based on Monthly Average Rates. Month determined by Transfer of value date.

Rounding:

For each HCP/HCO, Transfers of value for each reporting category are rounded to the nearest GBP amount. The Total amount for each HCP/HCO represents the sum of the reporting category amounts.

Multiyear contacts:

For multiyear contracts, disclosure only includes Transfers of value applicable during the reporting period (1 January 2022 and 31 December 2022).

Post Publication Disputes:

SIFI will review and investigate disputes with HCPs/HCOs relative to our transparency reports. Subject to SIFI internal review and approval, any changes resulting from disputes will be published from time to time. Enquiries relating to SIFI transparency reports should be addressed to <u>ABPI.disclosure@sifigroup.com</u>