

## Methodological Note 2022

### Statement for the disclosure of 2022 data

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 2023.

### 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 our internal approval processes, provided they meet the criteria 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.
- As of 2022, FMC has moved to 'Legitimate Interests' as a legal basis to disclose all transfers of value made to HCPs/ORDMs including the following details: names of the individuals who have received payments or other transfers of value, the amounts of value transferred and the specific relationship this was related to e.g., consultancy fee (including related expenses agreed in the fee), travel & accommodation, etc.
- All relevant HCPs or ORDMs are made aware that all transfers of value will be disclosed at the time of signing the individual contracts.
- 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 2022 disclosure data please visit the ABPI website: <http://www.abpi.org.uk>