

Medice UK Ltd Transfer of Value Methodological Note (2023 Data)

All activities and engagements carried out by Medice UK (Medice) with healthcare professionals (HCPs), other relevant decision makers (ORDMs), healthcare organisations (HCOs) and patient organisations (POs) in the UK (and across the wider EU) are both in accordance with, and in keeping with the Association of British Pharmaceutical Industry Code of Practice for the Pharmaceutical Industry, 2021 (the Code) and the EFPIA Code of Practice. As such, all Transfers of Value (ToV) will be published in accordance with the Code on the ABPI Central Platform.

Medice will write to all HCPs, ORDMs and HCOs in March 2024 to give them the opportunity to review any transfer of value made to them during 2023. Once the data is verified, it shall be published on the ABPI central platform in June 2024.

As part of the pharmaceutical industry's annual disclosure of transfers of value to HCPs, ORDMs, HCOs and POs via the Disclosure UK platform and 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 at the end of June.

Commitment to openness and transparency

Medice is committed to preserving the integrity of Disclosure UK and transparency in our interactions with HCPs, ORDMs and HCOs. Payments, or payments in-kind, made by Medice to HCPs, ORDMs and HCOs, will be collated on a secure internal company database.

All ToV will be allocated to one of the categories outlined below:

- Registration fees (maximum of one per year) that are paid by Medice to or on behalf of an HCP associated with their attendance at national or international educational meetings, congresses or courses.
- Travel (this can be flights trains, taxis, bus transfers and other travel related costs) and hotel accommodation include costs associated with travel, subsistence and accommodation agreed as part of sponsorship paid by Medice to or on behalf of an HCP. Costs for ground transportation (e.g. bus or taxi) that are organised for group transportation and not assigned to certain HCPs are reported in aggregate, but where the identity of the HCP is known, it is split by HCP. This is associated with their attendance at national and international educational meetings, congresses or courses as part of support towards continuous medical education.
- Fees for service and consultancy with related expenses where Medice engages an HCP/HCO/PO for services when there is genuine and legitimate business need and where the HCP/HCP/PO is qualified and appropriate to provide the services and will be paid at the Fair Market Value. These services include:
 - Speaking at and chairing meetings
 - Training services
 - Participation at advisory boards
 - Development of educational materials
 - General consulting/advising
 - Market research activities where there is remuneration; payment for these services are only disclosed if Medice is aware of the identity of those participating in the market research
 - Services performed in connection with a third-party conference
- Related Expenses such as travel costs and subsistence incurred by an HCP while carrying out engagements on behalf of Medice as agreed as part of their

sponsorship as per ABPI Code and as per Art 10 EFPIA Code of Practice within limits set within the national association.

- Sponsorship agreements through financial or non-financial support to legitimate established organisations for medical or scientific education (including independent conferences). The aim is to increase the scientific or educational quality of the event and/or support with the logistics in modest venues in line with Medice ethical principles, as described in the mandatory sponsorship agreements. This may include symposia and sponsoring of the speakers or faculty.
- Donations, grants and benefits in kind; following a written request, a 'donation' is a contribution made towards the work or fund-raising activities that an HCO carries out independent of Medice. Following a discussion or a request from an HCO, a 'grant' is a contribution to some, or all, of the costs of an activity that an HCO carries out independent of Medice.
- Following a request or discussion with an HCO, 'a benefit in kind' is the provision of a service, benefit, technical or administrative input given to an 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 the cost of an event; this may include sponsorship or support for the running of an event by an organisation independent to Medice.

Paperwork associated with all activities will be recorded, checked, stored, and made available by Medice as required by the Code.

In a situation where a payment is made to an organisation (such as a departmental meeting, or research budget/ fund), but is intended for the use of a specific individual, the payment will be recorded and declared as a payment made to that individual.

All contracts (both one-off contracts and annual contracts) make clear the intention of Medice to comply with both the letter, and the spirit, of the Code in relation to the publication of all ToV made during the reporting year as required by the Code.

Multi-year contracts will be reviewed on an annual basis to ensure compliance with the Code and any changes in the reporting requirements relating to ToV made in the particular year is included.

Where one or more individuals withdraw their consent or in situations where consent could not be obtained, ToV will be declared as part of the aggregate reported. Medice endeavours to encourage disclosure by all HCPs that we work with and encourage all HCPs and HCPs to do so.

Data protection and privacy

The rights of all parties will be respected with regards to Data Protection. Parties shall have their Data Protection rights explained to them, in line with Medice's corporate Data Protection policy.

Currency

Where payments are made to groups or individuals in Europe, and paid in Euros (€) these payments will be declared in Pounds Sterling (£) on the ABPI Central Platform calculated using a fixed exchange rate for 2023 payments.

Tax

All payments made by Medice will be subject to the appropriate local taxes (Medice is not responsible for the tax arrangement of individuals or organisations or the subsequent reporting thereof in relation to any ToV made by Medice).

In line with all invoices and payment requests received, Medice will pay all fees and appropriate local taxes such as 'Value Added Tax' at the specified local rates.

Non-HCP Transfer of Value

In line with updates in requirements for disclosure of Transfer of Value in 2023 that require Medice to disclose values supplied to non-HCPs. Where Medice has engaged with non-HCPs for services having provided a Transfer of Value, these individuals will be treated in the same way as HCPs.

ToV in cases of partial attendance or cancellation

Where an HCP/HCO does not receive the benefit due to a no-show or cancellation of the event, the associated costs are not reported, such as cost of cancelling travel or hotel booking. In case of a partial attendance, only the costs received will be reported. Where Medice has to pay cancellation fees as per contractual agreements, for events that have been cancelled, Medice will report the payments.

Cross-border activities

Medice endeavours to capture and report all ToV to HCPs and ORDMs with their primary practice in a country with the EFPIA Code of Practice and/or other cross border transparency reporting requirements. The country of disclosure is determined by the address of main practice for HCPs.

Consent Management

Medice ensures that all efforts have been made at a local level to achieve a high level of individual HCP payment disclosure whilst aligning with the recognisable applicable Data privacy regulations. The process is to request consent once from the individual HCP with the first contract for all future engagements in the year for the period the consent is given.

The data of the HCP is only reported after the consent is given; where there is no response is received, as there is no response assumed and the data is reported under the aggregate data.

Consent to disclosure can be withdrawn at any time by the HCP and after public disclosure on receipt from the HCP/HCO then:

- Where the consent is withdrawn before disclosure, the consent value is registered as a 'no'
- Where the consent is withdrawn after public disclosure, there is a process of withdrawal, and all requests and issues are managed by Medice UK. HCPs and HCOs can email Medice at enquiries@medice.co.uk if there is any data that is believed to be inaccurate.