

Methodological Note

ADVANZ PHARMA is committed to ensuring transparency of relationships with healthcare professionals (HCPs) and healthcare organisations (HCOs) by operating within the Farmaindustria Code of Practice, the National Business Association of the Pharmaceutical Industry established in Spain, aligned with the European Federation of Pharmaceutical Industries and Associations (EFPIA) Code on Disclosure on Transfers of Value.

Transfers of Value (ToV) i.e. payments or benefits received by HCPs and HCOs during the 2021 calendar year will be disclosed on Ethics and Transparency page ([link](#)) within <https://www.advanzpharma.com/> webpage.

The principles applied in this methodological note are relevant to the Spain.

Definitions

Healthcare Professionals (HCPs)

As defined in Title I, CHAPTER IV, Clause 18. Transparency of the interrelationships of the pharmaceutical industry. In addition, ADVANZ PHARMA regards all employees of the governmental organization or any private Health Care Provider as HCP's or any individual outside ADVANZ PHARMA network who could influence the prescription, sales, supply or administration are included in the scope. Please note that HCPs have the right to opt out from disclosure of their ToVs at an individual level.

Healthcare Organisations (HCOs)

As defined in Title I, CHAPTER IV, Clause 18. Transparency of the interrelationships of the pharmaceutical industry. As such ADVANZ PHARMA regards GP medical practices and Clinical Commissioning Groups (CCGs) to be within scope.

Research and Development

As defined in Title I, CHAPTER IV, Clause 18. Transparency of the interrelationships of the pharmaceutical industry. All payments to healthcare professionals and healthcare organisations related to research and development are disclosed as aggregate figures in accordance with the Farmaindustria Code of Practice.

Disclosure Categories

In 2021 ADVANZ PHARMA has disclosed the following financial payments:

1. Transfers of value to named individual healthcare professionals (HCPs) who have given their consent to disclose for:
 - i. receipt of support for attendance at third party led educational meetings.
 - ii. fees for providing consultancy services and expenses relating to the consultancy services.

Where permission has not been obtained or where the individual HCP has refused permission, ADVANZ PHARMA has declared the total spend as an aggregate figure for the total non-consenting HCPs as a separate line entry within the relevant disclosure category.

2. Transfers of value to healthcare organisations (HCOs)
 - i. For payments made to medical associations, healthcare organisations or institutions in relation to meetings. This includes direct funding such as sponsorship fees, fees paid for exhibition stands and indirect support such as logistics agency or subsidising the cost of registration fees.
 - ii. Fees for service paid to institutions, organisations or associations for services or any type of funding by companies not otherwise covered by the relevant codes.

ToV Transaction Principles

VAT

For all ToVs VAT is excluded.

Transaction Date

ADVANZ PHARMA will disclose a transfer of value when internal approval for a project/activity is given and the money is allocated. This may mean that some projects approved in 2021 will be disclosed as part of the 2021 annual reporting period even though the payment may not occur until 2021.

Multi-Year Projects

Where projects run for several years ADVANZ PHARMA will declare the amount paid relevant to the year in which each part of the payment was made. Thus a project which spans 4 calendar years and includes several individual transfers of value during that time will have four associated disclosures; one for each calendar year showing the value of the transfer made in that specific calendar year.

Cross-Border Payments

All disclosures are made in the country in which the HCP or HCO practice is located. Payments made to Spanish-based HCP or organisations by ADVANZ PHARMA overseas operations are disclosed within Spain.

Co-Marketing Projects

Where ADVANZ PHARMA jointly markets a product with another pharmaceutical company, ADVANZ PHARMA will only declare those payments made directly from ADVANZ PHARMA bank accounts and listed in the company records as part of its normal business operations. Transfers of value made by its co-marketing partners will be disclosed separately by those organisations.

HCP Payments

Data Privacy

In accordance with Data Privacy law, ADVANZ PHARMA has obtained and retained records of consent from HCPs on an individual activity basis prior to disclosing personal data such as individual transfers of value. Where permission has not been obtained or where HCPs have refused consent, ADVANZ PHARMA has declared the total spend as an aggregate figure given on a separate line entry within the relevant disclosure category and the % of non-consenting HCPs given as a percentage of the total HCPs receiving a ToV.

Market Research

Where the identity of an HCP participating in a market research project is known to ADVANZ PHARMA a ToV disclosure will be made at the individual HCP level.

Fee Payment to Private Companies

Where HCP invoices through their private company for the purposes of their private income, any payments to that company will be regarded for disclosure purposes as a payment to the HCP directly. Similarly for organisations where the majority of employees or contracted suppliers are comprised of HCPs, the full value of payments made to such organisations associated with the services of a named or identifiable individual will be regarded as if it was a direct payment to the HCP.

Fee Payments to Charities

HCPs who have worked with ADVANZ PHARMA may ask for their fee to be paid to charity. ADVANZ PHARMA does not encourage this type of fee payment and all payments are normally made directly to the HCP; where payment to a charity may occur the disclosure is still made against the individual HCP.

Payments to Third Party Organisations for Services Provided by Individual HCPs

In some cases ADVANZ PHARMA contracts with HCPs through a third party agency. In such cases, ADVANZ PHARMA is responsible for ensuring that the HCP fills and signs the agreement of service and consent form contained in the 'ADVANZ PHARMA's Consultant pack'. ADVANZ PHARMA will disclose any payments made to the individual HCP by the service agency as if the payment had been made directly by ADVANZ PHARMA to that HCP.

Medical Education Grants

ADVANZ PHARMA has been occasionally approached by independent companies to provide funding in relation to medical education projects. ADVANZ PHARMA's funding policies in these circumstances require that ADVANZ PHARMA has no influence over the details of the project. As ADVANZ PHARMA would not influence or select HCPs involved in such projects, ADVANZ PHARMA would disclose such payments under an HCO category where such definition is met by the independent company.

Contributions to Meetings

ADVANZ PHARMA will disclose all payments made to medical associations, healthcare organisations, institutions in relation to meetings. This includes direct funding such as sponsorship fees, fees paid for exhibition stands and indirect support such as providing a logistics agency or subsidising the cost of registration fees.

Sponsorship for HCPs to Attend Medical Meetings

Costs declared include registration fees, travel and accommodation. Costs related to subsistence (food) are not declared but the meal costs are regulated as per strict industry guidelines.

Grants to HCOs for Support to Attend Medical Meetings

Where ADVANZ PHARMA is requested by an HCO to provide a financial grant to assist its employees to attend third party medical meetings, where possible the payment will be disclosed against a named individual HCP. Where ADVANZ PHARMA is not aware of the identity of recipient HCPs, the grant is declared against the named healthcare organisation.

Note: The cost of any sponsorship related directly to food is outside the scope of disclosure.

All costs associated with meetings run solely by ADVANZ PHARMA are outside the scope of disclosure except for fees paid to individual HCPs providing services as speakers.

Patient Organisations

No disclosures for this category have been made in 2021

OTC and Medical Devices

There are no disclosures related to OTC medicines and Medical Devices.