

## **FRESENIUS KABI LIMITED AND CALEA UK LIMITED METHODOLOGICAL NOTES FOR REPORTING 2022**

In accordance with ABPI requirements, Fresenius Kabi Limited and Calea UK Limited (**Fresenius Kabi UK**) ensure that the nature and scope of any Transfers of Value with healthcare professionals and healthcare organisations are clear and transparent.

This Methodological Note provides guidance on how Fresenius Kabi UK have collected and reported this information. We have published Transfers of Value paid directly or indirectly for the period from 1 January 2022 to 31 December 2022.

Transfers of Value made to Patient Organisations and members of the public are disclosed separately on the Fresenius Kabi GB website [Transparency Initiative - Fresenius Kabi Great Britain \(fresenius-kabi.com\)](https://www.fresenius-kabi.com/transparency-initiative)

When we talk about **Transfers of Value (ToV)** we mean a direct or indirect transfer of value, whether in cash, in kind or otherwise made, whether for promotional purposes or otherwise, in connection with the development or sale of medicines or other products.

Where a ToV is non-monetary in nature, the calculation of the ToV is explained in the section below.

Please note that not all of our products are medicines; however, for 2022 we have disclosed ToV for all UK business streams including medical devices and nutritional products.

The term **healthcare professional** includes members of the medical, dental, pharmacy and nursing professions and any other persons who in the course of their professional activities may administer, prescribe, purchase, recommend or supply a medicine.

The term **healthcare organisation** means either a healthcare, medical or scientific association or organisation such as a hospital, clinic, foundation, university, or other teaching institution or learned society whose business address, place of incorporation or primary place of operation is in the UK, or an organisation through which one or more health professionals or other relevant decision makers provide services.

The term **Other Relevant Decision Maker (ORDM)** includes those with an NHS role who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply, or use of any medicine but who are not health professionals.

<b>ToV disclosed against individual healthcare professionals or ORDMs</b>	
Fees for service and consultancy and associated related expenses agreed in the fee for service or consultancy contract	We pay fair market value for the provision of services. This may include services such as chairing or speaking at meetings and participating in advisory boards. Agreements are put in place and fees and any expenses are documented. Where ToV have been made to the hospital or trust rather than the individual this has been recorded as a payment to an HCO.
Sponsorship of HCPs/ORDMs for attendance at meetings including registration fees and related expenses.	<p>We may provide sponsorship to individual HCPs or ORDMs to attend third party organised meetings. This may also include related registration fees, accommodation and related travel expenses which are disclosed.</p> <p>We may reimburse expenses where HCPs/ORDMs attend Fresenius Kabi organised meetings.</p> <p>For certain Fresenius Kabi UK internally developed programmes and some events that were hosted virtually, we have disclosed a ToV using a value for a comparable course.</p>

<b>ToV disclosed against HCOs</b>	
Contributions to cost of meetings and events	Fresenius Kabi UK disclose all payments to HCOs. This includes direct funding such as sponsorship fees.
Fees for services	Fees paid to HCOs for the provision of services are reported as a fee against the relevant HCO.

Fresenius Kabi does not include any free of charge products provided to HCOs under a commercial arrangement as these are out of scope.

### **Other considerations**

**GDPR and consent for disclosure from HCPs/ORDMs:** Up until May 2022, agreements between Fresenius Kabi UK and HCPs have included a section referring to Disclosure UK and transparency which sets out our disclosure obligations and requires consent from the HCP to the disclosure exercise. Since May 2022 the agreements set out that we rely on legitimate interests as the legal basis to process and share data information for disclosure purposes.

**Disclosure of HCPs and institutions:** Where an HCP is not affiliated with an institution or healthcare organisation, any disclosure for that HCP has been disclosed without an institution name.

Where an HCP has changed institution or is affiliated with different institutions during 2022, there may be more than one ToV shown against that HCP for disclosure purposes.

**Cross border activity:** Reportable transfers of value provided by Fresenius Kabi affiliates to UK HCPs and HCOs have been included as part of the Disclosure UK exercise. These activities are disclosed on a named basis for 2022 as we rely on legitimate interests as the legal basis for disclosure purposes.

**Reporting:** We will look at whether the event date took place within the reporting period 1 January 2022 to 31 December 2022.

**VAT:** Where applicable, disclosure of payments does not include VAT. Cross border transfers of value may include VAT depending on the source.

**Exchange Rate:** For services provided outside of United Kingdom, ToV are reported in £GBP. Where transfers of value are reported in local currency, amounts are converted using a single annual exchange rate for each currency.

**Multi-year Contracts:** Where activities straddle calendar years, the amounts paid in the relevant year will be disclosed.

Where any issues are raised with reporting, we will review and any changes resulting from this review will be published in an updated report.