

# METHODOLOGY NOTES



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From: GALDERMA (UK) LIMITED

Subject: GALDERMA (UK) LIMITED HCP/HCO Disclosure Code Methodology Notes 2019

Contact Person: FLORENCE.FALOWO@GALDERMA.COM

## **BACKGROUND**

Galderma (UK) Limited published the disclosure data in connection with the interactions with HCPs and HCOs according to the Association of the British Pharmaceutical Industry (ABPI) HCP/HCO Disclosure Code. In addition, it is Galderma's responsibility to publish a methodology note as required to summarise the methodologies used in preparing the disclosures and identifying Transfers of Value (TOV). This document supports and explains how Galderma publishes its information in order to comply with the ABPI Disclosure Code in 2019.

Galderma commits to comply to the national transparency laws/ regulations and the ABPI Disclosure Code fully. It is our responsibility to make all the possible effort to disclose the TOVs and obtain the consents from the HCPs and HCOs.

When errors are identified in the report after the disclosure, the contact person will be informed. The report will be uploaded again once the correct information is verified.

## **SELECTION OF DATA**

### **Change to Disclosure Process due to Covid-19:**

As set out in the APBI Disclosure Update of 28 May 2020, the ABPI and the PMCPA have agreed that it would not be appropriate to write to National Health Service (NHS) workers, hospitals, and other NHS organisations at this time. This would add additional load when the NHS is rightly focussed on responding to the COVID-19 pandemic. Therefore, all information has been provided in aggregate.

The information declared includes transfers of value that were made and does not include any planned activities and transfers where HCPs did not for whatever reason complete.

### **Donations and Grants to HCOs:**

See the scope in Clause 24 of the ABPI Code of Practice.

### **TOV or contribution to costs of events for HCOs:**

- **Sponsorship agreement** with HCOs, third parties appointed by HCOs to manage an event.
- **Registration fees** according to the information in the invitation letter from the third party conference organisation.
- **Travel & Accommodation**

**Fee for service and consultancy for HCPs or HCOs:**

TOV resulting from or related to contracts between Galderma (UK) Limited and HCPs or HCOs under which such HCPs or HCOs provide any type of services to Galderma (UK) Limited or any other type of funding not covered in the previous categories. Fees, on the one hand, and on the other hand Transfers of Value relating to expenses agreed in the written agreement covering the activity will be disclosed as two separate amounts. This is in accordance with Clause 24 of the ABPI Code of Practice.

## **DATA STANDARDISATION GUIDANCE**

Galderma applies the following approaches when considering:

**Applicable National Code:**

TOV is disclosed in a manner consistent with the Association of the British Pharmaceutical Industry (ABPI).

**Consent Management:**

Galderma ensures that the consent of TOV disclosure is obtained from the HCPs and HCOs in each engagement and proceed with the relevant disclosure to the applicable local data protection laws before publication.

The consent from the HCPs and HCOs can be withdrawn during the reporting period. Galderma should respect the correct and most up-to-date consent status.

**Cross-border TOVs:**

While the recipients of the TOV are HCPs of United Kingdom, in which it is their country of principal practice, it is disclosed by Galderma Entity of the country of principal practice in the report even the activities occurred outside United Kingdom.

The disclosure is always reported by the country of principal practice of the HCPs in such Galderma affiliate country. In this case, only one country reports the TOV to avoid duplication. When the TOV is shared by several Galderma entities, the home country of the HCPs having their principal practice in such Galderma affiliate country discloses the TOV.

**Currency used:**

All disclosed data is in british pound sterling (GBP). Where payments were converted from another currency, the calculations reflect the actual exchange rate on the date the payment was made.

**Documentation and Retention of Records:**

All Transfer of Values are documented required to be disclosed pursuant to Clause 24 of the ABPI Code of Practice and maintain the relevant records of the disclosures made under this Code for a minimum of 5 years after the end of the relevant Reporting Period, unless a shorter period is required under applicable national data privacy or other laws or regulations.

**Language of disclosure:**

English

**'No show' of HCPs**

In the situation of 'no-show', the payment is reported if there is no transfer of value to an HCP from Galderma. When the travel and accommodation are arranged via an agency and the booking cannot be cancelled, this cost is not reported while there is no transfer of value to an HCP from Galderma.

**Patient Organisation TOV**

Patient Organisation is reported in a separate report on Galderma's website. The information for disclosure includes name of patient organisation, total amount of transfer of value in each reporting period and the nature of financial support.

**Reporting format or platform of disclosure:**

The format of the report will be made on corporate website of Galderma.

**Reporting period:**

Disclosures shall be made on an annual basis and each reporting period shall cover a full calendar year.

For this reporting period, the TOVs between 1 January 2019 and 31 December 2019 are disclosed. It covers all the TOVs according to the payment date of each TOV in the accounting system, not the date when an HCP or HCO provides the services.

**Treatment of multi-year contracts:**

Galderma executes the payments yearly, or at the end of the multi-year contract, or a lump-sum to the HCPs or HCOs within certain number of years based on the terms of the contracts. Galderma reports the data whenever a financial transaction occurred during the reporting year in relation to the multi-year contracts.

**VAT:**

Value added tax (VAT) costs paid by Galderma or via a third party to the HCPs or HCOs is reported. All amounts are inclusive of VAT where VAT has been paid.

Regarding withholding tax, Galderma reports the full payment amount.