

**Methodological Note to 2022 Disclosure Report for
Besins Healthcare (UK) Limited (in respect of payments
made to healthcare professionals and healthcare
organisations in Ireland)**

LIST OF ABBREVIATIONS

BHUK	Besins Healthcare (UK) Limited
EFPIA	European Federation of Pharmaceutical Industries and Associations
GDPR	General Data Protection Regulation
HCO	Healthcare organisation
HCP	Healthcare professional
IPHA	Irish Pharmaceutical Healthcare Association
TOV	Transfer of Value

DEFINITIONS

Transfer of Value (TOV)

Direct and indirect transfers of value, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of prescription-only medicine exclusively for human use. Direct transfers of value are those made directly by a company for the benefit of a HCP. Indirect transfers of value are those made on behalf of a Member Company for the benefit of a HCP, or transfers of value made through an intermediate and where the Member Company knows or can identify the HCP/HCO that will benefit from the Transfer of Value. ¹

Healthcare Professional (HCP)

The term “healthcare professional” means a person of any of the following classes: (i) registered medical practitioners (ii) registered dentists (iii) registered pharmacists (iv) registered nurses. ¹

Healthcare Organisation (HCO)

The term ‘Healthcare Organisation (HCO)’ means any healthcare, medical or scientific association or organisation such as a hospital, clinic, foundation, university or other teaching institution or learned society (except for a Patient Organisation (PO) within the scope of Annex III of this Code) whose business address, place of incorporation or primary place of operation is in Europe or an organisation through which one or more HCPs or other relevant decision makers provide services. ¹

INTRODUCTION

Besins Healthcare UK Limited (BHUK) is committed to transparent interactions with HCPs and HCOs.

HCPs and HCOs offer expert knowledge on patients' behaviour and management of diseases and are the primary point of contact with patients. This plays a valuable role in informing BHUKs efforts to improve patient care.

BHUK is committed to communicating transfers of value made to HCPs and HCOs in a transparent manner. In doing so, all reasonable efforts will go into making sure they are accurate, valid and complete. BHUK complies with all laws, rules and regulations. Laws in the European Union protect the rights of citizens in relation to the way their personal data is processed. HCPs are covered by Data Privacy laws, and this affects the way in which BHUK can publish the HCP's transfers of value. BHUK will seek permission (consent) from the HCP to individually publish their transfers of value and as such HCPs have the right to opt out of individual disclosure.

BHUK is committed to disclosing all TOV to HCPs and HCOs in accordance with its commitment to the IPHA Code of Practice and in alignment with the EFPIA Code on Disclosure on Transfers of Value.

All required TOVs made in Ireland from 1st January 2022 to 31st December 2022 are disclosed on the Besins Healthcare website www.besinshealthcare.ie

This document summarises the approach taken by BHUK in calculating the figures provided and considers;

[1] IPHA Code of practice 2021 for the Pharmaceutical industry. Available from [IPHA Code of Practice 2021](#)

[2] EFPIA Code of Practice 2019. Available from: [EFPIA Code of Practice](#)

HOW WAS THE DISCLOSURE DATA COLLECTED, ORGANISED AND PUBLISHED?

TOV data is collected from the contract templates received by the business and populated into a spreadsheet tracker. This tracker is used by BHUK to track payments to HCPs and HCOs located in Ireland. All financial TOVs are reconciled against the contractual agreements, the tracker recordings and the actual payments made. The TOV data is categorised into the disclosure categories as outlined below.

The accuracy of the data is checked and once finalised transferred onto a template available on the EFPIA website <https://www.efpia.eu/relationships-code/disclosure-of-payments/> The populated template is published on the Besins Healthcare website <https://www.besinshealthcare.ie/>

DISCLOSURE CATEGORIES

Sponsorship agreements with HCOs/ third parties appointed by HCOs to manage an event

BHUK supports HCOs by way of sponsoring events and projects including for example scientific professional meetings, congresses, conferences, symposia and other similar events. In consideration for the sponsorship, the recipient shall allow BHUK to for example;

- exhibit a booth at an event and display materials,
- provide a slide presentation on product information,
- advertise the company logo on materials.

Contribution to costs related to Events

For transfers of value made to healthcare professionals, payments are limited to sponsorship for registration/course fees and/or travel and/or accommodation.

Research and development

There are no disclosures in scope of this category in 2022.

Patient organisations

There are no disclosures in scope of this category in 2022.

OTHER CONSIDERATIONS

Cross border payments

All disclosures are made in the country in which the HCP or HCO practice is located. Payments made to an Irish-based HCP or organisation by Besins entities located in other countries are disclosed within Ireland, regardless of the source of funding.

Multi-year contracts

When BHUK has contracted with an HCP or HCO for a period that spans more than 1 calendar year, only transfers of value executed during the calendar year will be included in the disclosure. The remainder of the contract values will be disclosed in future relevant disclosure periods.

Over the counter medicines and medical devices

There are no disclosures in scope of this category for 2022.

VAT

Where payments were made and VAT was applicable, the VAT has been excluded for the purposes of disclosure. Therefore, all values provided are exclusive of VAT. There are no other tax considerations.

Exchange Rates and Currencies

The amounts disclosed are those actually paid by BHUK. They may differ slightly from the amounts received by the HCP/HCO as they do not take into consideration any exchange fees or other fees applied by the recipient's bank.

On occasions payments are made in a currency other than euros. In these situations, the exchange rate will mean the exact equivalent in euros according to the date on which the conversion calculation was made. All disclosures will be displayed in euros. The euro totals will be calculated using the exchange rate on the day of payment using Currency Exchange Rates-International at xe.com. Readers should understand that the total amounts disclosed in euros should therefore vary slightly from the exact amount paid in the local currency; variations will be greater if there have been significant movements in exchange rate during the reporting period.

Time of payment

The date recorded for the TOV is the date the payment was processed by BHUK.

Consent for disclosure and GDPR

In accordance with Data Privacy law, BHUK 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, BHUK has declared the total spend as an aggregate figure given on a separate line entry within the relevant disclosure category.

CONTACTS

For other enquiries related to the information in either this Methodological Note or the 2022 Disclosure Report please contact: information@besins-healthcare.com.