

# Methodological Note 2023

## Almirall Sp. z.o.o.

# Methodological Note 2023

1. Introduction
2. Definitions
3. Disclosure Methodology
4. Categories of Transfers of Value
5. Disclosure Scope
6. Specific Considerations
7. Consent Management
8. Financial Information
9. Post Publication

## **1. Introduction**

Almirall supports the principle of disclosure and complies with the EFPIA (European Federation of Pharmaceutical Industries and Associations) Code on Disclosure of Transfers of Value from Pharmaceutical Companies to Healthcare Professionals, Healthcare Organisations, and Patient Organisations “ToVs” implemented in Europe.

## **2. Definitions**

Almirall recognizes all the definitions set out in the EFPIA Code of Practice. To access the Code, click [here](#)

**Patient Organisations:** Support of and interactions with Patient Organisations are in conformity with the EFPIA Code of Practice. Such support and Interactions can be found [here](#)

**Recipients:** Almirall recognises the definition of Healthcare Professional ‘HCP,’ Healthcare Organisation ‘HCO,’ and Patient Organisation ‘PO’ set out in the EFPIA Code of Practice. To access the Code click [here](#)

**Research and Development:** Almirall recognises the definition of Research and Development Transfers of Value set out in the EFPIA Code of Practice. To access the Code, [here](#)

**Third Parties:** Third parties working for and on behalf of Almirall where such parties exist and have provided a ToV on Almirall's behalf have been reported to Almirall and are disclosed as required.

**Transparency:** all ToV provided to HCPs and HCOs are disclosed following the required templates and in time. This information can be found [here](#).



*June 2024*

2

### **3. Disclosure Methodology**

ToVs to HCPs have been disclosed where possible against the individual HCP. Where consent has not been provided and is required by regulation, ToVs have been disclosed in aggregate. Where an HCP has consented to some but not all ToVs being disclosed, those with no consent have been added to the aggregate category. See Partial Consent below.

ToVs made to local HCPs or HCOs by Almirall Head Office and/or other affiliates have been reported to Almirall and have been disclosed as required. See Cross-border Activities below.

HCPs operating through their own company will be disclosed against the individual HCP where consent has been provided to do so. In such situations, the principle practicing address will be that of the registered company.

ToVs to HCOs are disclosed against the individual HCO.

Financial support, significant indirect support and/or significant non-financial support to POs are disclosed in individual in the country where the PO has its Head Office, and with additional information.

### **Disclosure of Research and Development Transfers of Value**

Costs that are subsidiary to these activities are included in the aggregate amount.

Thus, Almirall discloses payments agreed with universities and research centers for pre-clinical research as well as clinical trial agreements in hospitals (either directly payments or through a third party), fees of independent professionals to provide research and development services and investigators meeting expenses.

Almirall does not disclose the payments made to companies providing services for research and development (CROs).

### **4. Categories of Transfers of Value (ToV)**

Full definitions and information on the categories of TOV required by the EFPIA Code of Practice can be found on this link, click [here](#)

Donations for corporate or charitable purposes do not fall into the scope of the Disclosure requirements. These have been disclosed as required.

**Benefits in kind:** Almirall has not provided any Benefits in Kind in 2023 to HCPs or

## HCOs. **5. Disclosure Scope**

Almirall promotes Prescription Only Medicines as well as products that are registered as Over The Counter (OTC) Products or Medical Devices. As these are all promoted and can be prescribed. Almirall does not believe this fall into the excluded disclosure category and has made disclosures against all ToVs for all products irrespective of their registered category.



*June 2024*

HCPs working for Almirall as company employees (full or part time), or as consultants, are not included in the disclosure data, as all such individual's primary occupation is not that of a practicing health professional.

3

### **Date of Disclosure**

All services and events taking place in 2023 are disclosed in this year, provided that they are paid before 1st May 2024. Later payments will be disclosed in the following transparency exercise.

## **6. Specific Considerations**

**ToVs in case of partial attendances or cancellation:** Where a partial attendance has been provided this has been disclosed working on a pro-rata basis of the benefit received by the HCP or HCO. ToVs that did not ultimately take place or were canceled are not disclosed as no benefit was received by the HCP or HCO. ToVs to non-presented doctors at an event are disclosed in aggregate.

**Cross-border Activities:** Where Almirall Global or any other Almirall affiliate provides a ToV to a local HCP, HCO or PO, the respective Almirall entity obtains consent, if needed, and records the ToV in the Almirall Disclosure system.

**Country Unique Identifier:** Almirall maintains an up-to-date contact database with an internal unique code in order to avoid misleading or duplications. The database allows HCPs to have more than one practicing address associated with them. For example, when an HCP works at different centers/ hospitals etc. For the purposes of disclosure, the database only recognises the principal practice address.

**Multi-year Contracts:** Where agreements, sponsorships, and the like fall into more than one year these are disclosed when any payment is made, whether in full or in part; hence payment will be split over several years.

## **7. Consent Management**

**Consent collection:** In the spirit of transparency and in compliance with Data Privacy requirements Almirall has ensured each agreement with an HCP includes a section for the individual to consent to either individual or aggregate disclosure, this is requested for each activity.

**Management of recipient data/consent withdrawal:** The consent management system enables amendment from individual to aggregate or vice versa and consents are changed manually in the database. This is done via an email inbox specified in the consent / agreement (tovconsent@almirall.com). If an HCP requests clarification or changes to the disclosed data or consent status Almirall will act on the request as appropriate, reply to the HCP with the clarification

or that the change has been implemented. The email from the HCP will serve as proof of withdrawal / change of consent. Disputes on the value of the ToV disclosed will be resolved as quickly as possible and the disclosed data amended where possible and required.

**Partial Consent:** Almirall collects consent on a per activity basis as such HCPs have a choice for each activity to be disclosed either individually or in aggregate. Almirall discloses each ToVs according to the HCP consents and cherry-picking is not allowed.



*June 2024*

4

## **8. Financial Information**

**Currency:** All disclosed data is in Euro and in the local currency. Where a ToV has been provided in a different currency it is converted into Euro using the exchange rate of the date when it has been paid. This is an automatic conversion that takes place in the Almirall disclosure database.

**VAT:** VAT is included in the disclosure data, where it applies.

## **9. Post Publication**

The annual report will remain on the website for three years. Once published, the report will be updated when necessary.

**End**

