

Proveca Ltd. Transfer of Value Disclosure 2019

Methodological Note

Statement for the disclosure of 2019 data during the COVID-19 pandemic in 2020

As part of the pharmaceutical industry's annual disclosure of transfers of value to HCPs, ORDMs and HCOs via the Disclosure UK platform and in order to ensure accuracy of the published data, the ABPI writes to all of the HCPs, ORDMs and HCOs named in companies' disclosure data ahead of its publication on Disclosure UK at the end of June. (Over 20,000 in June 2019.) Given the unprecedented pressure on the NHS and health care professionals in responding to the COVID-19 pandemic, in April 2020 the ABPI and PMCPA agreed that it would not be appropriate for industry to write to HCPs, ORDMs or HCOs to request that disclosure data be reviewed. Doing so would add additional work for NHS professionals at this time. To avoid this, and in-line with guidance provided by the ABPI, Proveca's 2019 transfer of value data has been published on Disclosure UK in aggregate. Commitment to transparency. The pharmaceutical industry is committed to preserving the integrity of Disclosure UK and transparency in our interactions with HCPs, ORDMs and HCOs. The ABPI continues to explore how the full disaggregated 2019 data can be submitted to Disclosure UK in line with data from previous years.

Proveca Ltd. engages healthcare professionals (HCPs), other relevant decision makers (ORDMs), healthcare organisations (HCOs) and patients' organisations across Europe to obtain independent and expert advice to ensure high standards of patient care. Such engagements include but are not limited to research and development, educational and training events, advisory board meetings and attendance at conferences including promotional activities.

Proveca Ltd. has agreed to comply with the ABPI Code of Practice to document and publicly disclose payments or other transfers of value made directly or indirectly to HCPs, ORDMs and HCOs. This note describes Proveca Ltd's method of disclosure of Transfer of Value (ToV) for 2019 in accordance with the requirements of the ABPI code.

In 2019, we chose to review all payments made by our UK team to external sources. The relevant payments for disclosure, as per the ABPI 2019 Code of Practice, were identified. These payments were reviewed and all the invoices for these payments reviewed and added appropriately to the supplied Disclosure UK spreadsheet provided. The spreadsheet was checked for validation appropriately prior to submission.

With regards to contracts, the ToV in this disclosure only relate to one-off contracts in which Proveca's obligation to comply with the ABPI code is clear.

For payments made to HCOs, payments are declared in Pound Sterling (£) and values disclosed do not include VAT.

For payments made to HCPs, payments are declared in Pound Sterling (£) and the values disclosed are the full payment and therefore include VAT.

Regarding disclosure of payments, HCPs were provided with a contract and the following ABPI guidance documents in order to make a decision: Disclosure UK GDPR Factsheet (REP-0120-0119) and HCPs: Step up to Disclosure UK (REP-0122-0220). HCPs were asked to inform us of their decision whether to have their payments publicly disclosed or not. All HCPs responded with a decision, which we respected and followed.

Date of preparation: May 2020

The categories used by Proveca for disclosure are as follows:

Registration Fees; Registration fees paid by Proveca to or on behalf of an HCP associated with their attendance at national or international educational meetings, conferences or courses.

Travel & Accommodation; Costs associated with travel, subsistence and accommodation agreed as part of sponsorship paid to or on behalf of a HCP associated with their attendance at national and international educational meetings, conferences or courses.

Fees; including speaker honoraria, consultancy fees, fees for market research or advisory activities carried out by HCPs or HCOs for or on behalf of Proveca.

Related Expenses; Travel costs and subsistence incurred by a HCP while carrying out engagements on behalf of Proveca or agreed as part of their sponsorship.

Donations, grants and benefits in kind; following a written request, a 'donation' is a contribution made towards the work or fund-raising activities that a HCO carries out independent of Proveca.

Following a discussion or a request from a HCO, a 'grant' is a contribution to some, or all, of the costs of an activity that a HCO carries out independent of Proveca.

Following a request or discussion with a HCO, 'a benefit in kind' is the provision of a service, benefit, technical or administrative input given to a HCO as an alternative to a financial contribution (donation or grant); the approximate cost of the benefit in kind (the cost the HCO would reasonably expect to pay) is the value of the ToV recorded.

Contribution to the cost of an event; this may include sponsorship or support for the running of an event by an organisation independent to Proveca.

Sponsorship is the provision of financial support to a HCO as part of running an event, in return for the opportunity to present our material as per the ABPI Code of Practice.

There were no non-monetary ToVs made to other relevant parties in 2019.

There were no joint working agreements in 2019.

Proveca's 2019 disaggregated data is published here:

<https://www.proveca.com/about/other-company-information/>