

METHODOLOGICAL NOTE – disclosure of transfers of value

company: GSK (GlaxoSmithKline Oy and GlaxoSmithKline Consumer Healthcare Finland Oy)

year: 2019

Collaboration between GSK and the healthcare professionals benefits the patients and is essential for medical development. Several useful medicinal innovations, new treatments and vaccines, especially to treat respiratory diseases, HIV and other infectious diseases, have been developed by GSK as a result of this collaboration. Healthcare professionals add valuable insight of clinical patient work to GSK. At the same time educational events and congresses supported by the company enable that healthcare professionals have access to latest medical scientific information and increase their possibilities to educate themselves and maintain their professional skills.

As of the beginning of 2016, GSK globally ended payments to healthcare professionals (HCPs) to speak about our prescription medicines or vaccines to other healthcare professionals. At the same time GSK also stopped providing financial support directly to individual healthcare professionals to attend medical congresses. Diverse collaborative work with healthcare professionals continued for example in conducting clinical research and as advisory board activities. As of 2019, GSK implemented amendments in the policy for how we collaborate with healthcare professionals, for example in making payments to selected expert practitioners for speaking in GSK's educational events and paying reasonable travel and accommodation costs to standalone meetings. These changes were made to improve HCP's understanding of new data and clinical experience with GSK products. The changes in interactions with HCPs apply only to a limited number of innovative products within GSK's Pharmaceutical and Vaccines business and for a limited time in a product's lifecycle. The aim is to support HCPs to deliver better outcomes for patients.

As a result of the amended policy, GSK has made fair market value payments in 2019 to selected and briefed expert practitioners who speak about the new science behind selected GSK products, their associated diseases and clinical practice in promotional settings. GSK has also paid reasonable travel and accommodation costs for HCPs to attend GSK-organised standalone meetings not held at a congress and directly paid registration fees for HCPs to attend remote congress webinars/webcasts. GSK has continued not to sponsor HCPs to attend any local or international congresses / conferences.

Annual reporting of Transfers of Value

GSK issues one disclosure report for each country, showing all disclosable transfers of value made to healthcare professionals and healthcare organisations (HCOs) by the company (GlaxoSmithKline Oy and GlaxoSmithKline Consumer Healthcare Finland Oy) related to the collaboration. The principle is named disclosure on individual basis except collaboration related to research and development (R&D) where transfers of value are reported as an aggregate as per EFPIA guidance.

Disclosure on individual level (specifying the name of the recipient) requires the written consent from the HCP. If GSK has not obtained this consent or the HCP has withdrawn it, the transfers of value are disclosed as an aggregate at the end of the HCP part of the report in section "Other". The individual HCP cannot be identified and only the number of recipients and their share (%) is disclosed for each reporting category.

Categorisation of the transfers of value – healthcare professionals:

Aligned with the amended policy for collaboration with HCPs, transfers of value from GSK to HCPs in Finland in 2019 consist of fees related to speaker engagements e.g. in local or cross-border meetings, speaker training meetings, GSK standalone meetings, satellite symposia and webinars/webcasts. Transfers of value consist also of travel and accommodation costs and also of one remote congress webinar/webcast registration fee. In addition transfers of value relate to consultancy engagements, for example advisory board activities, and separately itemised expenses related to these engagements (travel and/or accommodation). Speaker and consultancy fair market value payments are based on the duration of the service. The fees paid by GSK, which are aligned with Akava recommendations, are based on the running time of the service and consist of the service itself and the planning/preparatory work required. For example, travel time is not separately reimbursed.

The personal details in the disclosure report are based on the information provided by the HCP on the disclosure consent form.

Healthcare organisations:

The HCO-section of the disclosure report contains the collaboration with HCOs and transfers of value related to contribution to the costs of events. This category includes for example GSK's direct financial support for arranging educational events. In these cases GSK has in return obtained for example a booth at the exhibition or an advertisement. GSK might also have contributed for example by covering the venue costs, hospitality, equipment and material for the event. In 2019 over a third of GSK's contribution to costs of events was allocated to the national medical days.

GSK's contribution to the FinnGen research project as a funding partner is also reported in this section.

Grants to institutions, organisations or associations for the support of healthcare or research are also disclosed in the HCO-section of the disclosure report.

The receiving HCO is identified and the details in the report are based on the information in the written contract between GSK and the HCO.

Research and development:

In Finland the R&D emphasis is on clinical vaccine studies. The transfers of value in this category reported for 2019 relate for example to research on shingles, meningitis, COPD and respiratory syncytial virus (RSV) vaccines. The disclosed transfers of value are mainly research funding to research institutions. A majority of the funding relate to research personnel fees.

In the R&D category transfers of value are reported as an aggregate as per EFPIA guidance.

Individual disclosure:

The collaboration between GSK and healthcare professionals is defined and described in a written contract for the service. An HCP who has received a transfer of value has a unique identifier in the GSK financial system. This identifier is used to link each transfer of value to the individual HCP. The identifier is global, which ensures that also cross-border payments are correctly allocated.

The transfers of value related to research and development and to HCO collaboration are identified and allocated in similar manner.

Other general principles and methods applied by GSK in reporting are described in the table below:

Term	Definition
Reporting date	GSK has defined two types of Transfers of Value for Reporting Date purposes: <ul style="list-style-type: none"> • a <i>Monetary Transfer of Value</i> is a payment of money made to an HCP/HCO by GSK either directly or through an intermediary (for example, fees for service). The Reporting Date for these Transfers of Value will be the actual payment date, irrespective of when the event happened (for example, when a consultancy fee is paid, not when the work took place). • a <i>Non-monetary Transfer of Value</i> is a benefit received from GSK either directly or through an intermediary <i>without</i> a monetary payment (for example, a flight is paid to a travel agent or event organiser). The Reporting Date for these Transfers of Value will be the event date (for example, date when the event took place).
Value Added Tax (VAT)	GSK has taken the decision to report values including VAT wherever possible due to the complexity of VAT regimes around Europe and the inconsistency of whether VAT may or may not be reimbursable depending on where the transaction took place and the country of residency of the HCP or HCO. All other taxes are included in the reported values. For HCP-fees which have been paid as salary, the gross amounts without social costs are disclosed.
Currency conversions	GSK records Transfers of Value in the currency in which the transaction took place. The report will show all values in the currency of the country in which the report is made.
HCPs employed by GSK	GSK will not report payments made to HCPs who are employed by GSK as staff members. GSK considers that it would be inappropriate to disclose an employee's salary, bonus, expenses and benefits.
Multi-year contracts	Transfers of Value are reported on the relevant Reporting Date (payment date or event date – see above) irrespective of the duration of the contract. In Finland the contracts between GSK and the HCP/HCO are as a rule made in maximum for one calendar year.
Tesaro	GSK's acquisition of TESARO was completed in 2019. GSK has aligned with the EFPIA Board resolution made in 2016 that in the case of a new entity (following M&A) the implementation of the EFPIA Disclosure associated with the acquisition can be implemented with a 12-month delay. Therefore all Transfers of Value incurred for TESARO activities in Finland in 2019 will be disclosed by TESARO and GSK commences reporting in June 2021.

The report published on the GSK's webpage is the officially maintained report. Data contained in this report is valid at time of reporting in June 2020.