

**GSK Austria wants to highlight some specific local requirements/regulations:**

- The values of TOVs (Transfer of Value), which are disclosed, are collected/recorded according to [EFPIA transparency code](#).  
Details can be found in the table below.
- When interacting with a HCO there can be indirect Transfers of Value and associated individual disclosure, even if there is no direct Transfer of Value between GSK and the HCO. Particularly this is valid for support of HCOs/institutes or a Third Party, authorized by the HCO.
- If GSK cooperates with an HCP on an international basis and repeatedly, (e.g. HCP was booked as speaker on an international congress or a GSK event), this can lead to higher Transfers of Value.
- Due to GSK's focus business areas, GSK mainly supports projects of HCOs in the area of respiratory diseases, HIV and vaccines.
- The GSK Consumer Healthcare Business in Austria, including all responsibilities, was ceded to GSK-Gebro Consumer Healthcare GmbH (formerly Novartis Consumer Health-Gebro GmbH).

**Below are some specific points to help you understand the content of the report:**

- Reporting period:  
The external disclosure report will be published by the end of June of each year for those Transfers of Value made in the preceding calendar year.
- Transfer of Value:  
A Transfer of Value is a transfer of some form of value or benefit from GSK to a Healthcare Professional (HCP) or Healthcare Organisation (HCO). A Transfer of Value can be made directly from GSK or indirectly via an intermediary and can be a monetary payment (such as a fee for service) or a non-monetary benefit (such as a flight or a registration fee where the money is paid to a travel agent or event organiser).
- Domicile reporting:  
GSK will report Transfers of Value in the country in which the HCP/ HCO has their primary practice, but that report will include all Transfers of Value made by GSK anywhere in the world.
- Consent:  
For HCP/Os, the external disclosure report will include Transfers of Value only if the HCP/O has consented to disclosure. If consent is not given or is withdrawn, Transfers of Value for that HCP/O will be disclosed on an aggregate basis that does not identify the recipient HCP/O.
- Product scope:  
Disclosure is based on all reportable Transfers of Value made to HCPs and HCOs, related to GSK prescription-only-medicines and to those GSK OTC medicinal products within a Brand that have a prescription legal status. All non-medicinal products within a Brand (i.e. cosmetic, food, device, or other) are out of scope.

## EFPIA Disclosure Report 2019 - Methodological note Austria



- Aggregate amounts (sections HCP/Os):  
The amounts, which are reported in aggregate, include Transfers of Value to HCP/Os, who have withdrawn their consent for individual disclosure.
- Missing Data from Event Management Agencies due to delays caused by COVID-19:  
At the time of publishing GSK Austria was not able to collect all TOV data collected on behalf of GSK from some 3<sup>rd</sup> party agencies due to processing delays caused by COVID 19. GSK Austria will add the missing data to this report as soon as the 3<sup>rd</sup> party data becomes available later in the year and publish an amendment where required.
- Search function:  
For search function use shortcut Strg+F (e.g. search for last name)
- Abbreviations:
  - HCP (Healthcare Professional) = Angehörige der medizinischen Fachkreise
  - HCO (Healthcare Organisation) = Institutionen der medizinischen Fachkreise/  
Gesundheitsorganisationen
  - N/A (not applicable) = nicht anwendbar
  - AT (Austria) = Österreich
  - R&D (Research & Development) = Forschung und Entwicklung (klinische Studien)
  - VHC = Verhaltenscodex EFPIA = CoC = Code of Conduct

Term	Definition
Corporate scope	GSK will issue one report for each country showing all Transfers of Value made to HCPs / HCOs in that country by GSK, GSK Consumer Healthcare, and by ViiV Healthcare.
Reporting date	GSK has defined two types of Transfers of Value for Reporting Date purposes:  - 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 (a flight paid to a travel agent or events organiser, for example). The Reporting Date for these Transfers of Value will be the event date (for example, when the congress took place).
Value Added Tax	The recorded amounts of transfers of value are shown as net amounts (less any taxes and/or charges as applicable.)
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.
Novartis methodology	On 2 March 2015, GSK and Novartis completed a three part transaction, as a result of which GSK acquired Novartis' global Vaccines business (excluding influenza vaccines); created a new world leading Consumer Healthcare joint venture with Novartis; and divested its Oncology business to Novartis.  In respect of the Oncology business transferred to Novartis, we are not disclosing any Transfers of Value for which the Reportable Date is after 2 March 2015.
Tesaro methodology note for disclosure	Following the acquisition of Tesaro in 2019, GSK have 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 TOVs incurred for Tesaro activity in Austria in 2019 will be disclosed in a separate report on our website <a href="https://at.gsk.com/de-at/transparenzberichte/efpia-offenlegungsberichte/">https://at.gsk.com/de-at/transparenzberichte/efpia-offenlegungsberichte/</a> .
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.

Please consult the link [EFPIA transparency code \(https://www.efpia.eu/relationships-code/the-efpia-code/\)](https://www.efpia.eu/relationships-code/the-efpia-code/) for further details about the code itself.

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