

Guideline for interpretation of the Disclosure Report



Dear,

From 2015, GSK including the other member companies, is disclosing the Transfers of Value made to healthcare professionals and healthcare organisations. More specific detail around payments are available here <https://efpia.eu/relationships-code/disclosure-of-payments-to-hcps/>.

By summarising the Transfers of Value relating to our collaboration in a transparent way, we can together address any concern on perceived conflicts of interest and ensure society understands how industry and healthcare profession partnerships are critical to the quality of medical innovation.

Many thanks to all for support with this disclosure initiative. Through consent to named disclosure, we will go a long way towards meeting the growing expectations of society and ensuring a trusted and transparent relationship to the benefit of patients.

Yours sincerely,

Marija Krstić

General Manager

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Below are some specific points to help you understand the content of the EFPIA Disclosure report.

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 or a congress registration fee 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	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
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.
Distributors	If a distributor is involved in the promotion of medicines on behalf of a Member Company in an EFPIA country, and is therefore under the operational control and guidance of that Member Company, then its activities are reportable by the Member Company in that country. In such cases GSK will provide the data as a standalone distributor report (using the structure set out in Schedule 2 of the EFPIA Code), based on the distributor's own methodology and policies.
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 <http://transparency.efpia.eu/the-efpia-code-2> for further details about the code itself.