

Methodological Note for Reporting of Transfers of Value to Patient Organisations and Members of the Public including Patients and Journalists Data Year 2025

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Introduction

The ABPI Code of Practice requires that all companies must document and publicly disclose certain transfers of value made directly or indirectly to healthcare professionals (HCPs), other relevant decision makers (ORDMs), healthcare organisations (HCOs), patient organisations (POs) and members of the public (including patients and journalists).

Disclosure is required even if the payments are made by overseas affiliates, head offices in the UK or overseas and UK based offices.

Alexion provides support to patient organisations to help those organisations respond to the needs of the groups they look after. Alexion also engages members of the public for certain contracted services as described below. Working with patients and patient organisations can bring public health benefits and we carry out these activities in line with the ABPI Code of Practice.

This methodological note provides the summary of methodologies used by Alexion in preparing the disclosures and in identifying each category of transfer of value. This note defines the types of transfers to be disclosed, which transfers are excluded, and any other relevant information related to how Alexion defined and reported the disclosed data.

This methodological note will be attached to the reporting section on the website where the annual reports for both the patient organisations and Members of the public can be found at the time of publication.

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1 Definitions

Transfers of Value (ToVs): mean a direct or indirect transfer of value, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development or sale of medicines.

- A Direct ToV is one made directly by Alexion for the benefit of a Recipient.
- An Indirect ToV is one made on behalf of Alexion for the benefit of a recipient or through an intermediate and where the company knows or can identify the recipient that will benefit from the transfer of value.

Patient Organisation (PO): a not-for-profit entity/organisation mainly comprising of patients and/or caregivers that represents and/or supports the needs of patients and/or caregivers and which business address, place of incorporation or primary place of operation is in the UK.

Patient Organisation Representative: an individual who is authorised to represent and express the views of a Patient Organisation on a specific issue or disease area.

Members of the public: including patients and journalists, patient advocates and carers:

- **Patient/Patient Expert:** an individual who is speaking in a personal capacity as a patient, a patient advocate or a caregiver, to educate and inform others about the experiences of patients, the impact of a health condition on patients, their needs and other insights based on personal and/or professional experience with patients.
- **Journalist:** an individual who is not an HCP and who performs a role of writing, presenting or communicating via an informational or news website, print media (newspaper, magazine etc) or broadcast media (TV, radio etc), or who is engaged in the preparation of any of the foregoing. This role may be performed on an employed, self-employed or voluntary basis.

Donations and Grants

Alexion provides support for medical or scientific education, advances in medical or scientific research, health or healthcare systems or disaster relief through financial or non-financial ToVs to legitimate, established organisations. Alexion can provide this support through:

- Donations and grants. Funds, benefits-in-kind, or services freely given for the purpose of supporting healthcare, scientific research or education, with no consequent obligation on the recipient organisation, institution and the like to provide goods or services to the benefit of the pharmaceutical company in return. They must not be provided to individuals for their personal benefit.

- Contributions or funding (or referred to as Grants) to support initiatives in HCP Education, including education about healthcare systems and practices, Medical or Scientific Research, or Partnerships. Grants are only provided to organisations and an arm's length arrangement is in place.
- Donations as goods or services must not bear the name of any medicine but may bear the name of the company providing them.

Sponsorship

A sponsorship is a contribution, financial or otherwise, in whole or in part provided by or on behalf of a company towards an activity (including an event/meeting or material) performed, organised or created by a patient organisation.

2 Disclosure scope

2.1 Patient Organisations

The following types of ToVs to Patient Organisations are disclosed by Alexion:

- Grants and benefits in kind provided to Patient Organisations
- Fees for service (and related expenses) provided by one or more individuals representing the Patient Organisation (examples may include speaking at an external or internal Alexion event, contribution to the development of educational or campaign material, participation in advisory boards or market research when the identity of the individual is known to Alexion, and participation in disease awareness campaigns)
- Sponsorships and Corporate Memberships (examples may include the cost of an event or activity hosted by a Patient Organisation, or an annual membership with defined benefits)
- Payment for contracted services as part of a partnership agreement project
- A benefit in kind provided as part of a project (examples may include agency support to manage an event, or sponsoring Patient Organisation representatives to attend events through the reimbursement of registration fees, travel and accommodation)

2.2 Members of the Public, including patients and journalists

The following types of ToVs to individuals are disclosed by Alexion:

- Fees for services and consultancy (examples include speaker fees, speaker training, development of educational or patient materials, general consulting and advising via advisory boards/expert input forums, fees for participating in market research where the identity of the participant is known to Alexion)

- Travel and accommodation (such as costs of flights, trains, taxis and hotel accommodation)

For members of the public, patients and journalists' disclosures are aggregated; disclosure is not made against individuals.

Where individuals associated with a patient organisation were engaged in a personal capacity (as patients, patient advocates, or caregivers) but not representing the patient organisation, nor mandated to express the views of the patient organisation, such individuals are classified as "Patients" for the purposes of this disclosure. Fees and reimbursement of travel and accommodation expenses paid directly to these individuals are disclosed in aggregate in the 'Patients' section of this report, in accordance with Clause 30 of the ABPI Code of Practice 2024.

2.3 Collection and reporting of ToV data

Alexion tracks both contracts and payment data to capture all forms of ToV (i.e. direct payment or benefits in kind). Payments to patient organisations are disclosed on a 'per activity' basis. Disclosure for the members of the public is reported on an aggregate basis.

2.4 ToV Value

ToV disclosures reflect the actual value or cost provided by Alexion and not the resulting income or benefit to the recipient.

2.5 Excluded ToVs

ToVs to HCOs and HCPs/ORDMs are covered by a separate disclosure methodology, as required by the ABPI Code.

Donations to Patient Organisations as part of Community Investments to charities and other non-profit non-HCOs are subject to separate disclosure.

2.6 Disclosing Entities

This annual disclosure report covers all ToVs provided by Alexion Pharma UK Ltd, its affiliates and acquired or merged companies irrespective of their location (if not disclosed under the acquired company name in a separate report provided to ABPI), to Patient Organisations and members of the public including patients and journalists in the United Kingdom.

2.7 Working in Collaboration with other Pharmaceutical Companies

For situations where Alexion jointly works with another pharmaceutical company, Alexion will only declare the ToVs made directly by Alexion. ToVs made by such a company will be disclosed separately by that organisation.

2.8 Cross-border activities

Regardless of which Alexion entity contracts with or pays a recipient, Alexion employees are required to capture and report all relevant ToVs to subjects whose main address or place of incorporation is in the United Kingdom, in accordance with the ABPI Code of Practice.

2.9 Date of ToV

Disclosure is made on the basis of the year the actual ToV was provided. In the case of multi-year agreements, the amount that will be disclosed will be the total amount paid by Alexion in each year.

3 Form of disclosure

3.1 Disclosure Publication Date

Alexion publishes the ToVs made in the preceding calendar year no later than 6 months after the end of the relevant reporting period. The information disclosed will remain available on Alexion website for three years thereafter.

3.2 Disclosure Platform

Alexion provides its annual disclosure for Patient Organisations and Members of the Public via:

- Alexion UK website: <https://alexion.com/worldwide/UK>
- AstraZeneca's global website under the Sustainability section: <https://www.astrazeneca.com/sustainability/ethics-compliance/astrazeneca-and-global-transparency.html#>
- "Patient Organisation" and "Members of Public" sections in ABPI's "Disclosure UK" portal: <https://search.disclosureuk.org.uk/>

3.3 Data Privacy

UK Data Privacy regulations do not apply to organisations as data is not classified as personal. Disclosure for members of the public is reported on an aggregate basis.

3.4 Disclosure Currency Data

Disclosure will be made in British Pounds. For ToVs made in foreign currencies, the conversion was made using our standard currency accounting rates before reporting.

3.5 Value Added Tax (VAT) and Other Taxes

VAT is not included in the ToVs included in this report.

3.6 Data Quality

Alexion aims to ensure that the data included in the disclosure report is complete to the best of our knowledge. Alexion keeps its disclosure data under review and will amend and/or update this if/and when it becomes aware that its quality and accuracy could be improved.