

**Methodological Note**  
**Orion Pharma (UK) Ltd**  
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**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, Orion Pharma'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.

The following information summarises the methodologies used in preparing the disclosures and identifying each category of transfer of value by Orion Pharma (UK) Ltd (Orion UK).

Disclosures made by Orion UK are made in line with the requirements of the ABPI Code of Practice for the Pharmaceutical Industry in the UK. The disclosure contains information on the transfers of value made directly or indirectly to health professionals and healthcare organisations and is set out on the ABPI Disclosure template.

Orion Pharma's 2019 transfer of value data has been published on Disclosure UK in aggregate. The disaggregated 2019 disclosure data has been published on the Orion Pharma (UK) Limited website and is available at: <https://www.orionpharma.co.uk/orion-support-story>

**Research and Development (R&D)**

The R&D transfer of value has been calculated as payments to healthcare organisations, universities and scientific research organisations and healthcare professions for clinical studies.

The aggregate values for research and development costs was calculated by the Orion UK parent company, Orion Corporation, Orionintie 1A, FI-02200 Espoo, P.O.Box 65, FI-02101 Espoo, Finland.

Where R&D payments have been made in GBP, then this figure has been used for disclosure calculations; where payments have been made in Euro or USD, this has been converted to GB Pounds (GBP) based on annual data provided by the HMRC exchange rate website for 2019:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/855501/Average-to-the-year-to-march-2020.csv/preview](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/855501/Average-to-the-year-to-march-2020.csv/preview)

### **Joint Working**

Orion UK has not conducted any joint working or initiatives with any other pharmaceutical companies or any healthcare organisations in the UK, so disclosure values for 2019 are purely those of Orion UK.

### **Consent to Disclosure**

In 2019 consent for disclosure was sought on an ongoing 'per activity' basis. The most recent indication of consent to disclose, or otherwise, was used to determine if an individual HCP was disclosed in aggregate or on an individual basis. The local written records of consent or non-consent to disclosure payments are maintained by Orion UK. Information on the requirement and intent to disclose payments was provided to all individuals and organisations in advance of any monies being paid.

### **Information Used to Perform Calculations**

Values declared include:

- Grants for medical and educational goods and services which enhance patient care, or benefit the NHS and maintain patient care; these payments have been made to healthcare organisations.
- Contracts between Orion UK and institutions, organisations or associations of health professionals under which they have provided a services on behalf of Orion UK.
- Sponsorships of individual UK health professionals and other relevant decision makers in relation to attendance at meetings. Sponsorship in this context includes registration fees and the costs of accommodation and travel.
- Payments to healthcare professionals acting as consultants to Orion UK for services such as speaking at and chairing meetings.

### **Tax Considerations**

All payments to consultants are paid against signed agreements that set out and clarify the relationship between the two parties i.e. Orion UK and the consultant; the agreement states that the consultant is not an employee of Orion and that they are responsible for their own local tax affairs and national insurance contributions that may arise as a result of any payments.

### **Treatment of VAT**

VAT has not been included if it can be recovered by Orion UK in accordance with the VAT regulations.

### **Currency**

Orion UK makes all payments to individuals and organisations using a UK bank account. All payments are made in GBP and the value going through the Orion UK bank account is shown in GBP even if the end recipient chooses to receive payment in a different currency.

We have shown and declared all values in GBP on our return.

### Cross Border Payments

Payments to individuals who are not resident taxpayers in the UK have been added on to the disclosure of transfer value declarations in their country of residence. In these instances, payments were made in local currency, relevant to the country of residence of the individual concerned.

Where payments have been made in Euro or other currencies, this has been converted to GBP based on monthly data provided by the HMRC exchange rate website for 2019:

<https://www.gov.uk/government/publications/hmrc-exchange-rates-for-2019-monthly>

### Multi-Year Contracts

All invoices/payments processed through Orion UK accounts in the financial (and calendar) year January to December 2019 are those shown on the disclosure.