

## Zentiva Pharma UK Ltd. Transfer of Value Disclosure 2022 – Methodological Note

Zentiva Pharma UK Ltd. is committed to making the transfers of value made to HCPs and HCOs transparent, accurate, and complete. Zentiva, as a member of Medicines for Europe complies with the obligation to collect, disclose and report transfer of values related to prescription-only medicines to HCPs/HCOs in accordance with the requirements of Chapter 7 of the Medicines for Europe Code of Conduct 2020.

### Scope

This Methodological note provides a summary of the methodologies used by Zentiva to report on Transfers of Value between Zentiva Pharma UK Ltd. and HCP/HCOs between 1 January 2022 and 31 December 2022.

The Medicines for Europe Code of Conduct indicates that Companies must publish disclosure data relating to the following transfers of value (whether directly or indirectly funded) made to healthcare professionals, healthcare organisations or patent organisations:

- Fee for service (excluding associated expenses) except fees paid in connection with research & development activities or anonymous market research;
- Registration fees to attend a third party congress/conference;
- Travel and accommodation provided to delegates to attend a meeting – including third party meetings, company organised meetings and site visits;
- Grants and donations, both financial and in-kind, to organisations that are part of the healthcare community;
- Sponsorship of healthcare organisations' and patients organisations' activities and events.

In the UK, most companies report Transfer of Value in line with Clauses 28-31 of the ABPI Code of Practice 2021 using the ABPI Disclosure Template. Zentiva Pharma UK Ltd. have used the ABPI template for disclosure in 2022.

The ABPI Disclosure Template includes the following categories:

- Collaborative/Joint Working
- Donations and Grants to an HCO
- Contribution to costs related to events to an HCO/HCP, such as:
  - Sponsorship agreements
  - Registration fees
  - Travel and accommodation
- Fees for service and consultancy to an HCO/HCP
  - Fees for service and consultancy
  - Expenses related to fees for service and consultancy
- Research and Development



## Definitions

**HealthCare Professional (HCP):** An individual who is qualified to prescribe, administer, purchase, supply or recommend a Medicinal Product whose primary practice, principal professional address or place of incorporation is in Europe.

**Healthcare Organisation (HCO):** Any legal person (i) that is a healthcare, medical or scientific association or organization (irrespective of the legal or organizational form) such as a hospital, clinic, foundation, university or other teaching institution or learned society (except for patient organisations within the scope of the EFPIA PO Code) whose business address, place of incorporation or primary place of operation is in Europe or (ii) through which one or more HCPs provide services.

**Transfer of Value (TOV):** - Direct and indirect TOV, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of prescription only medicine exclusively for human use.

- Direct TOVs are those made directly by a Member Company for the benefit of a Recipient.
- Indirect TOVs are those made on behalf of a Member Company for the benefit of a Recipient, or those made through a Third Party and where the Member Company knows or can identify the Recipient that will benefit from the Transfer of Value
- Donations, Grants, Sponsorship: Providing 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 Zentiva to the benefit of Zentiva in return. Donations and grants to HCPs are prohibited.

## Completion of template

TOV disclosure data in respect of 2022 has been inputted into the disclosure template using Commercial Agreements made with the HCP/HCO and reconciliation with subsequent invoices received. There were no Cross border transfer of values from our corporate organisation or affiliates for UK HCPs and HCOs during 2022.

- **Collaborative/Joint Working**

No transfer of value payments were made by Zentiva Pharma UK Ltd. for Collaborative or Joint Working during 2022.

- **Donations and Grants to HCOs**

Donations and Grants to HCOs that support healthcare, including donations and grants to institutions, organisations or associations that are comprised of HCPs and/or that provide healthcare. Charitable product donations to a HCO in the context of humanitarian aid is disclosed in the “Donations and Grants” category.

- **Contribution to costs of Events**

Sponsorship agreements with HCOs/ third parties appointed by HCO to manage an Event.



These are the payments that Zentiva Pharma UK Ltd. has made to third parties for organised third party congress/conferences. This category includes direct funding related to sponsorship fees or the right to exhibit a stand.

- **Registration Fees**

No transfer of value payments were made to HCPs for registration fees to attend medical/scientific educational meetings in 2022.

- **Travel and Accommodation**

This sub-category lists the transfers of value for travel and accommodation attributable in relation to supporting HCPs to attend scientific or medical meetings. This can include airfares, train tickets, taxis, tolls, parking fees and hotel accommodation. Zentiva supported HCP attendance at one European Conference during 2022.

- **Fee for service and consultancy**

This category includes the fees and any related expenses covered by a consultancy agreement with an HCP/HCO. The fee is reported under the 'Fees' sub-category and any related expenses, such as travel, accommodation, or registration fees, will be reported under the 'Related expenses agreed in the fee for service or consultancy contract....' When it is not possible to separate the fee from the related expenses, in these instances the total transfer of value will be reported in the 'Fees' sub-category.

- **Research and Development (R&D) transfers of value**

Zentiva Pharma UK Ltd. did not fund any activity or clinical study related to research and development during 2022.

## **How has consent been obtained?**

HCPs are covered by Data Privacy laws and this affects the way in which Zentiva can publish the HCP's transfers of value. The Company must seek permission (consent) from the HCP or have other legal reasons to individually publish their transfers of value. Transfers of value to HCOs is disclosed on a named basis and no consent is required. Consent to provide disclosure information of transfer of values is included as a part of the commercial agreement completed by the HCP/HCO with a clear GDPR disclaimer.

## **Tax considerations**

It is the responsibility of the HCP/HCO to inform tax authorities of payments received as transfer of values from Zentiva Pharma UK Ltd. Zentiva is not responsible for providing information to tax authorities regarding payments made to HCPs and HCOs.

## **VAT**

VAT is included in the payments.



## **Currency aspects**

Conversion rates: All 2022 payments were made either in GBP or Euros. Euro entries were converted to GBP by Zentiva using the conversion rate of 0.87.

## **Multi-year contracts**

Only contracts with transfer of value where the payment was actually made in 2022 have been included in the 2022 disclosure. For contracts where the invoices are paid out in 2023, the disclosure will be made in 2023.

## **References**

Medicines for Europe Code of Conduct 2020  
ABPI code of Practice 2021

**Date of Preparation:** June 2023

