

METHODOLOGICAL NOTE – disclosure of transfers of value

company: GSK (GlaxoSmithKline Oy)

year: 2024



Collaboration between GSK and the healthcare professionals benefits the patients and is essential for medical development. Several useful medicinal innovations, new treatments and vaccines have been developed by GSK as a result of this collaboration. In GSK, this applies especially to innovations for treating respiratory diseases, certain cancers, HIV and other infectious diseases. Healthcare professionals add valuable insight of clinical patient work to GSK. At the same time educational events and congresses supported by the company enable that healthcare professionals have access to the latest medical scientific information and increase their possibilities to educate themselves and maintain their professional skills.

In 2024, GSK has continued the collaborative work with healthcare professionals (HCPs) and medical experts to understand patient needs and to ensure our products are being administered in the right way. The company has made fair market value payments to selected and briefed expert practitioners who speak about the new science behind selected GSK products within GSK's Pharmaceuticals and Vaccines business, their associated diseases and clinical practice in promotional settings. GSK has also paid reasonable travel and accommodation costs for HCPs to attend GSK-organised standalone meetings not held at a congress. GSK has continued not to sponsor HCPs to attend any local or international congresses / conferences.

Diverse collaboration work with HCPs was to a significant extent conducted through clinical research and also, for example, as advisory board activities.

Annual reporting of Transfers of Value

GSK issues one disclosure report for each country, showing all disclosable transfers of value made to healthcare professionals and healthcare organisations (HCOs) by the company related to the collaboration. The principle is named disclosure on individual basis except collaboration related to research and development (R&D) where transfers of value are reported as an aggregate as per EFPIA guidance.

As of February 2024, GSK has in Finland used legitimate interest as the legal basis for disclosing the individual transfers of value (EU General Data Protection Regulation (GDPR) article 6(f)) instead of individual written consent from the HCP. As earlier, the healthcare professional is always free to refuse to collaborate with the company if she / he doesn't want information to be disclosed. Additionally, the HCP always has the right to object to data processing. In such case, the disclosure is not done on individual level (specifying the name of the recipient) but the transfers of value are disclosed as an aggregate at the end of the HCP-part of the GSK disclosure report in section "Other". The individual HCP cannot be identified and only the number of recipients and their share (%) is disclosed for each reporting category.

Categorisation of the transfers of value – healthcare professionals:

Aligned with the company policy for collaboration with HCPs, transfers of value from GSK to HCPs in Finland in 2024 consist of fees related to speaker engagements e.g. in local or cross-border meetings, speaker training meetings, GSK standalone meetings, satellite symposia and webinars/webcasts. Transfers of value consist also of travel and accommodation costs. In addition, transfers of value relate to consultancy engagements, for example advisory board activities, and separately itemised expenses related to these engagements (travel and/or accommodation).

METHODOLOGICAL NOTE – disclosure of transfers of value

company: GSK (GlaxoSmithKline Oy)

year: 2024



Speaker and consultancy fair market value payments are based on the expertise of the HCP and medical experts and duration of the service. The fees paid by GSK, which are aligned with national recommendations, are based on the running time of the service and consist of the service itself and the planning/preparatory work required. For example, travel time is not in general separately reimbursed.

The personal details in the disclosure report are based on the information provided by the HCP to GSK.

Healthcare organisations:

The HCO-section of the disclosure report contains the collaboration with HCOs and transfers of value related to contribution to the costs of events. This category includes for example GSK's direct financial support for arranging educational events. GSK might have contributed for example by covering the venue costs, hospitality, equipment and material for the event. In these cases, GSK has in return obtained for example a booth at the exhibition or an advertisement.

GSK's contribution to the FinnGen research project as a funding partner is also reported in this section.

Grants to institutions, organisations or associations for the support of healthcare or research are also disclosed in the HCO-section of the disclosure report.

The receiving HCO is identified and the details in the report are based on the information in the written contract between GSK and the HCO.

Research and development:

In Finland the R&D emphasis is on clinical vaccine studies. The transfers of value in this category reported for 2024 relate for example to research on shingles, meningitis, respiratory syncytial virus (RSV) vaccines and Alzheimer's disease and cancer medicines. The disclosed transfers of value are mainly research funding to research institutions. A majority of the funding relate to research personnel fees.

In the R&D category transfers of value are reported as an aggregate as per EFPIA guidance.

Individual disclosure:

The collaboration between GSK and healthcare professionals is defined and described in a written contract for the service. An HCP who has received a transfer of value has a unique identifier in the GSK financial system. This identifier is used to link each transfer of value to the individual HCP. The identifier is global, which ensures that also cross-border payments are correctly allocated.

The transfers of value related to research and development and to HCO collaboration are identified and allocated in similar manner.

METHODOLOGICAL NOTE – disclosure of transfers of value

company: GSK (GlaxoSmithKline Oy)

year: 2024



Other general principles and methods applied by GSK in reporting are described in the table below:

Term	Definition
Reporting date	<p>GSK has defined two types of Transfers of Value for Reporting Date purposes:</p> <ul style="list-style-type: none">• 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 (for example, a flight is paid to a travel agent or event organiser). The Reporting Date for these Transfers of Value will be the event date (for example, date when the event took place).
Value Added Tax (VAT)	<p>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.</p> <p>For HCP-fees which have been paid as salary, the gross amounts without social costs are disclosed.</p>
Currency conversions	<p>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.</p>
HCPs employed by GSK	<p>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.</p>
Multi-year contracts	<p>Transfers of Value are reported on the relevant Reporting Date (payment date or event date – see above) irrespective of the duration of the contract.</p> <p>In Finland the contracts between GSK and the HCP/HCO are as a rule made in maximum for one calendar year.</p>