



**Methodological Note to
2022 Disclosure Report
for**

**Patient Organisations, Patients,
Journalists and Members of the
Public**

Aventis Pharma Limited

1) INTRODUCTION

The European Federation of Pharmaceutical Industries and Associations (“EFPIA”) Disclosure Code requires all EFPIA member companies to disclose a list of patient organisations to which it has provided financial support and/or significant indirect/non-financial support or with whom it has engaged to provide contracted services for that Member Company. This disclosure must include a description of the nature of the support or services provided that is sufficiently complete to enable the average reader to form an understanding of the nature of the support or the arrangement without the necessity to divulge confidential information.

The 2021 ABPI Code of Practice, which came into force on the 1st of July 2021, includes the requirement for the annual disclosure of contracted services and sponsorship to patient organisations, as well as fees for contracted services paid to members of the public including patients and journalists.

Criteria and requirements for Patient Organisation (PO) disclosures are defined in Clause 29.1 and 29.2 of the 2021 ABPI Code of Practice.

Criteria and requirements for the disclosure of payments made to members of the public (MoTP), including patients and journalists, are defined in Clause 30.1 of the 2021 ABPI Code of Practice.

Sanofi is committed to putting patients first and to amplifying patient voices. We recognise the challenges that patient groups face and want to help overcome them so that we can work together effectively and deliver the best outcomes for patients as part of our advocacy work. Our aim is to celebrate working in partnership or collaboration.

We are keen to look at the ways we can extend and increase the benefits of such partnerships under the increased transparency and reporting to which all organisations need to adhere.

We believe that MoTP and POs should be fairly compensated for the legitimate expertise and services they provide to the industry. At the same time, we acknowledge concerns that such transactions should be transparent.

This methodological note is intended to assist the reader to firstly identify the type of declarable Transfer of Value (TOV) made to a PO or MoTP, and secondly to understand how the PO or MoTP was recorded and verified for disclosure by Sanofi in the UK.

Sanofi is made up of different legal entities and in the UK, Sanofi conducts its business through Aventis Pharma Limited.

2) WHAT ARE THE ABPI CODE REQUIREMENTS?

The Association of the British Pharmaceutical Industry (“**ABPI**”) has translated the requirements of the EFPIA Disclosure Code in Clause 29.1 and 29.2 of the ABPI Code of Practice 2021 which state that:

29.1: Companies must make publicly available annually, a list of patient organisations to which it provides donations, grants or sponsorship (including in relation to events/meetings) or with whom it has engaged to



provide contracted services over the reporting period. This information must be disclosed on the company website either on a national or European level. Each reporting period shall cover a full calendar year.

Each company must include a note of methodologies used by it in preparing the disclosures and identifying support and contracted services provided.

29.2: The disclosure for the provision of donations, grants or sponsorship (including in relation to events/meetings) to a patient organisation must include:

- the monetary value of each financial contribution (grant or sponsorship) to include a description that is sufficiently complete to enable the reader to understand the nature of that support or the arrangements in accordance with Clauses 23 and 10*
- the monetary value for each non-financial and/or indirect support (donation); the published information must also include a clear description of each donation that is sufficiently complete to enable the reader to understand the nature of the support or the arrangements. If the non-financial and/or indirect support (donation) cannot be assigned a meaningful monetary value, the published information must describe clearly the non-monetary value that the organisation receives that is sufficiently complete to enable the reader to understand the nature of the support or the arrangements in accordance with Clause 23.*

The disclosure for contracted services provided by each patient organisation, in accordance with Clause 24, must include:

- the total amount paid per patient organisation per calendar year including a description of the services provided that is sufficiently complete to enable the reader to understand the nature of the services provided without the necessity to divulge confidential information*
- fees and expenses should be disclosed separately.*

The requirements to disclose fees for certain contracted services paid to members of the UK public, including patients and journalists, are defined in Clause 30.1 of the ABPI Code of Practice 2021:

30.1 Companies must make publicly available annually details of the fees for certain contracted services paid to members of the UK public, including patients and journalists. These services include speaking at meetings, assistance with training, writing articles and/or publications, participating in advisory boards, advising on the design etc. of clinical trials and participating in market research where such participation involves remuneration and/or travel.

The disclosure for contracted services provided by members of the public, in accordance with Clause 24, must include:

- the total number of members of the public, including patients and journalists contracted to perform services and the total amount paid per calendar year, and a description of the types of services provided that is sufficiently complete to enable the reader to understand the nature of the services provided without the necessity to divulge confidential information*
- companies should provide a breakdown of the total payments to each group of individuals, ie the public, patients and journalists without the necessity to divulge confidential information*



- *fees and expenses should be disclosed separately.*

Each company must include a note summarising the methodologies used by it in preparing the disclosures and identifying support and services provided.

3) DEFINITIONS

The 2021 ABPI Code of Practice does define the Patient Organisation as:

An organisation mainly comprising of patients and/or caregivers or any user organisation such as a disability organisation, carer or relative organisation and consumer organisation that represents and/or supports the needs of patients and/or caregivers.

It additionally defines an individual representing a patient organization as:

A person who is mandated to represent and express the views of a patient organisation.

The term 'transfer of value' abbreviated to TOV means a direct or indirect transfer of value, whether in cash, in kind or otherwise.

4) HOW WAS THE DISCLOSURE OF LOCAL TRANSFERS OF VALUE ORGANISED?

Data was collected, reconciled, and reported using a commercially available information technology system (the "**System**") which was customised to Sanofi's organisational requirements. This System is used by Sanofi to track payments to patient organisations, patients and members of the public.

All payments to journalists were tracked by the Communications Lead and reported at the end of year.

5) WHICH ACTUAL DATES WERE USED FOR DISCLOSURE OF TOV?

The 2022 Disclosure Report includes all Transfers of Value processed by Sanofi to MoTP and POs between the 1st January 2022 and the 31st December 2022.

6) HOW WERE THE CURRENCIES AND EXCHANGE RATES MANAGED?

The amounts disclosed are those actually paid by Sanofi. They may differ slightly from the amounts received by the MoTP or POs as they do not take into consideration any exchange fees or other fees applied by the recipient's bank. The amount will always reflect the currency which was stated in the contract and signed.

7) HOW WAS THE VAT MANAGED?

The TOV reported is the total amount paid by Sanofi, including VAT where applicable.



8) CONTACTS

For data protection enquiries please contact Sanofi's Data Protection Officer at GB-DataProtection@sanofi.com.

For media enquiries please contact: +44 (0) 118 354 3554

For other enquiries related to the information in either this Methodological Note or the 2022 Disclosure Report please contact: gb-transparency@sanofi.com