

# GALDERMA

EST. 1981

## METHODOLOGY NOTES

Date: June 2023

From: Galderma (UK) Limited

**Subject: Galderma (UK) Limited HCP/HCO Disclosure Methodology Notes 2022**

Contact: Sara Morris, Compliance Manager

Email: [sara.morris@galderma.com](mailto:sara.morris@galderma.com)

## BACKGROUND

Galderma (UK) Limited (Galderma) has decided to voluntarily disclose spend transparency data in accordance with the transparency provisions of the Association of the British Pharmaceutical Industry (ABPI) Code of Practice.

This note summarises the methodologies used in preparing the disclosures and identifying Transfers of Value (ToV). This document supports and explains how Galderma publishes its information in order to disclose its ToVs in line with the ABPI Code.

Galderma commits to comply with the national transparency laws and regulations and the ABPI Code fully.

If any errors are identified in the report after publication, the contact person above may be notified. The report will be republished once the correct information is verified.

### Aggregated data

Until such a time as Galderma official agree to adhere to the ABPI Code of Practice, data to HCPs will be disclosed in an aggregated total.

### Elements that exceed the ABPI Code requirements

Galderma manufactures and markets prescription only medicines, medical devices, over-the-counter medicines and cosmetic products. Galderma does not differentiate between transfers of value to HCPs, ORDMs, HCOs or patient organisations relating to these different types of products. Therefore, Galderma's disclosure report will detail all transfers of value irrespective of the product type or class they relate to.

### SELECTION OF DATA

Galderma reports the data in the standardized template available from the PMCPA website.

Notes in relation to 2022 data

- **Donations listed to ‘Various NHS organisations’**

Galderma has made upon request donations of various personal protective equipment (PPE) available to HCOs for use in photodynamic therapy.

A value has been allocated to each unit for disclosure purposes as per the table below.

Item description	Allocated cost
HCP goggles	£70
Patient goggles	£60
Patient eye onocular caps	£16.50

In 2022, 55 of these items were donated to 14 various NHS institutions. A breakdown of the individual institution recipients is available on request.

- **R&D ToVs**

Please note that no costs related to R&D have been processed by Galderma in 2022.

- **ToVs to Patient Organisations**

No ToVs to Patient Organisations took place in 2022.

- **ToVs to Patients**

One patient was contracted for services in 2022. They received a total of £2295.50 in fees and £895.58 for associated expenses.

- **ToVs to Recipients based in Ireland**

One Irish HCP was contracted for services in 2022. They received a total of €8317 in fees and €2585 for associated expenses.

Arrangements with Healthcare Organisations are listed below;

Irish Association of Dermatologists	€7000 Sponsorship
Abbey Conference & Corporate	€5000 Sponsorship
Primary Care Surgical Association	€1250 Sponsorship
Primary Care Dermatology Society Ireland	€4178 Sponsorship
Irish Academy of Dermatology	€5888 Sponsorship
Our Lady of Lourdes Hospital, Drogheda	£4000 Donation

## **DATA STANDARDIZATION GUIDANCE**

Galderma applies the following approaches when considering:

### **Applicable National Code**

ToVs are disclosed in a manner consistent with the ABPI Code.

### **Lawful basis for processing data**

At the beginning of 2023 Galderma moved to legitimate interest as the lawful basis for processing data.

Prior to this time Galderma used consent as the lawful basis for processing data, however, as per the note above, all data disclosed in 2022 are in aggregate.

### **Cross-border TOVs**

Galderma has worked with all Galderma's affiliates worldwide to capture data relating to ToVs made by them to;

- (i) HCPs with their principal practice in the UK or Ireland and
- (ii) HCOs based in the UK or Ireland.

Galderma has used its best endeavours to include all such TOVs within its disclosure report for the UK & Ireland.

### **Currency or Exchange rates used**

All disclosed data is in British Pound Sterling (GBP). Where payments were converted from another currency, the calculations reflect an approximate exchange rate.

### **Documentation and Retention of Records**

Galderma maintains the relevant records of the disclosures made under the ABPI Code for a minimum of 5 years after the end of the relevant Reporting Period, unless a shorter period is required under applicable national laws or regulations.

### **Language of disclosure**

English

### **'No show' of HCPs**

The information declared does not include ToVs for any planned activities and transfers where HCPs did not, for whatever reason, complete.

### **Patient Organization TOV**

ToVs to Patient Organizations are also reported on Galderma's website Galderma.com. The information for disclosure includes name of patient organization, total amount of TOVs in each Reporting Period related to

- i. (a) monetary value of financial support and of invoiced costs; and  
(b) non-monetary benefit that the Patient Organization received when non-financial support cannot be assigned to a meaningful monetary benefit; and
- ii. contracted services; and the description of the nature of financial or non-financial support and contracted services.

### **Reporting format or platform of disclosure**

The format of the report will be made on the Galderma corporate website: [www.galderma.com](http://www.galderma.com)

### **Reporting period**

Disclosures shall be made on an annual basis and each reporting period shall cover a full calendar year.

ToVs are disclosed based on the date payment was made and not the date when an HCP or HCO provided the service or when the activity in scope occurred.

### **Treatment of multi-year contracts**

If Galderma entered in a multi-year contract with an HCP/HCO, data is reported in line with when a financial transaction occurred during the reporting year in relation to such multi-year contracts.

### **VAT and other tax aspects**

All amounts are exclusive of Value Added Tax (VAT).