

Guideline for interpretation of the Disclosure Report

Below we would like to give you further information for understanding the given data in the Disclosure Report.

Term	Definition
Corporate scope	GSK will issue one report for each country showing all Transfers of Value made to HCPs / HCOs in that country by GSK, GSK Consumer Healthcare, and by ViiV Healthcare.
Reporting date	GSK has defined two types of Transfers of Value for Reporting Date purposes: - a Monetary Transfer of Value 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 Non-monetary Transfer of Value is a benefit received from GSK either directly or through an intermediary <i>without</i> a monetary payment (a flight or a congress registration fee paid to a travel agent or events organiser, for example). The Reporting Date for these Transfers of Value will be the event date (for example, when the congress took place).
Value added tax	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.
Currency conversions	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.
HCPs employed by GSK	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.
Multi-year contracts	Transfers of Value are reported on the relevant Reporting Date (payment date or event date – see above) irrespective of the duration of the contract.

Domicile reporting

GSK will report Transfers of Value in the country in which the HCP/ HCO has their primary practice. The report will therefore include all Transfers of Value made by us anywhere in the world.

Reporting period

The external disclosure report will be published by the end of June of each year for those Transfers of Value made in the preceding calendar year - for example, 2019 Transfers of Value will be reported by end June 2020. Disclosures will be based on the Reporting Date for the Transfer of Value (see above).

Transfer of Value

A Transfer of Value is a transfer of some form of value or benefit from us to a Healthcare Professional (HCP) or Healthcare Organisation (HCO). A Transfer of Value can be made directly from GSK or indirectly via an intermediary and can be a monetary payment (such as a fee for service) or a non-monetary benefit (such as a flight or a registration fee where the money is paid to a travel agent or event organiser).

Publication period

The external disclosure report will be published for a minimum period of 3 years after the first publication, provided that a shorter publication period will not be necessary due to legal requirements.

HCP consent

For HCPs, the external disclosure report will include Transfers of Value only if the HCP has consented to disclosure. If consent is not given, is withdrawn or has only partly been given, Transfers of Value for that HCP will be disclosed on an aggregate basis that does not identify the recipient HCP.

Scientific meetings

GSK defines scientific meetings [e.g. congresses, conferences, symposium as well as GSK-/ViiV-/Tesaroinitiated meetings], as meetings that have a focus on medical scientific topics and that aim to educate Healthcare Professionals.

Attendee fee

This includes e.g. congress registration fees.

Fee for service & consultancy - fees

This relates to fees for services or consultancy that are based on contracts.

Fee for service & consultancy - travel & accommodation

Those are related expenses agreed in the fee for service or consultancy contract, including travel & accommodation relevant to the contract.

Sponsorship

This section refers to agreements with HCOs / third parties in order to manage an event.

Scientific meetings organised by a third party (e.g. agency)

Those costs will be reported under the name of the meeting and the name of the third party.

Scientific meetings organised by a third party for an HCO

Those costs will be reported under the name of the meeting and the HCO as well as the name of the third party.

Research & Development

If Transfers of Value are related to activities that belong to Research & Development, GSK will disclose those payments in aggregate, this means without disclosing the name of the contract partner.

In the category Research & Development GSK will only report Transfers of Value that relate to "regulatory necessary" studies. GSK defines regulatory necessary studies as studies that are necessary for getting licensing of medicines or for surveillance after drug approval (post-marketing surveillance). The following activities fall under that category: planning or conducting of non-clinical studies (as defined in OECD Principles on Good Laboratory Practice) clinical trials phase I – IV (as defined in Directive 2001/20/EC) and non-interventional studies according to § 6 FSA Transparency Code.

Moreover GSK subsumes in the "Research & Development" category studies that are necessary to prove the additional benefit of a drug for verifying and maintaining the reimbursement status.

Further information in relation to the FSA transparency code can be found here: www.pharma-transparenz.de