

Anylam Pharmaceuticals Transparency Reporting Methodological Note

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DISCLOSURES OF TRANSFERS OF VALUE: SUMMARY OF METHODOLOGY

1. INTRODUCTION

Alnylam Italy SRL (“Alnylam Italy”) has voluntarily agreed to abide by the EFPIA Code and supports the efforts of the Farindustria (Association of Pharmaceutical companies) to increase transparency in the pharmaceutical industry.

This methodological note is intended to accompany Alnylam Italy’s disclosure of transfers of value (“ToV”) and other benefits in kind to Italian HCPs and HCOs. It provides guidance on how Alnylam Pharmaceuticals Italy has recorded and reported this data. All data in the disclosure report was aggregated at time of publication.

Alnylam Italy voluntarily discloses all Transfers of Value to HCPs and HCOs in accordance with its commitment to the by the Farindustria and in line with the EFPIA Code.

- 1.1 This note summarises the methodologies used by Alnylam Italy in preparing Disclosures in to increase transparency in Italy.

2. DEFINITIONS

- **“Healthcare Organisation (HCO)”**: A healthcare, medical or scientific association or organisation (e.g., a hospital, clinic, foundation, university or other teaching institution or learned society) whose business address, place of incorporation or primary place of operation is in Italy; or an organisation through which one or more HCPs provide services. This can also include a self-incorporated company set up by an HCP.
- **“Healthcare Professional (HCP)”**: A member of the medical, dental, pharmacy or nursing professions or any other person who, in the course of his/her professional activities, may prescribe, purchase, supply, recommend or administer a medicinal product and whose primary practice, principal professional address or place of incorporation is in Italy.
- **“Continuing Medical Education (CME)”**: Scientific and educational activities, such as congresses, training events, and educational programs, aimed at maintaining, developing, or increasing the knowledge and professional skills of healthcare professionals (HCPs).
- **“Transfer of Value (ToV)”**: Direct and indirect transfers of value (in payments or kind, or otherwise made) in connection with the development and sale of prescription-only medicinal products for human use whether for promotional services or otherwise.
- **“Research and Development (R&D)”**: HCP/HCO transfers of value that relate to the planning and conduct of:
 - Non-clinical studies (as defined in OECD Principles on Good Laboratory Practice);
 - Clinical trials (as defined in Directive 2001/20/EC);
 - Non-interventional studies that are prospective in nature and that involve the collection of patient data from or on behalf of individual, or groups of, HCPs specifically for the study. This

also includes investigator sponsored research (ISRs);

- Non-interventional studies that are retrospective in nature have also been included within aggregate disclosure for R&D in this reporting year;

2.1 In the case of differences between the categorisation of transfers of value in the EFPIA reporting template and template prescribed by the Code of Good Practices for Pharmaceutical Industry the methodology below reflects the EFPIA terminology used within the standard EFPIA template.

3. DATA PRIVACY

3.1 Alnylam fully supports the principles of transparency and abides by applicable data protection laws. Data protection laws require Alnylam to obtain consent from individual HCPs prior to disclosing individual Transfers of Value to them. Alnylam makes every effort to obtain, and maintain a record of, the necessary permissions. Alnylam's approach for HCP consent is 'all in' or 'all out'. In other words, the consent decision is not specific to a transaction or activity but applicable to the HCP for all transfers of value and a 'yes' decision is effective until withdrawn.

3.2 HCP data will be removed or amended from the publication on the Company's webpage/regulatory platform and/or our database or other platforms as soon as reasonably practicable from the date the HCP's decision to withdraw consent is communicated to us.

3.3 Where HCPs do not give permission to such individual Disclosures, Alnylam discloses the total amount of all Transfers of Value in the relevant category as an aggregate figure.

3.4 Disclosures must remain in the public domain for a minimum of three years and Alnylam will document all Disclosures and retain the records for at least seven years.

4. TRANSFERS OF VALUE

4.1 Alnylam discloses the following Transfers of Value it makes to **HCOs**:

- **Congress and educational event sponsorship:** Expenses related to the sponsorship of HCOs and/or CME providers acting as congress organisers and/or secretariats in exchange for corporate benefits at an event (e.g., booth space, hosting of a symposium, stands, advertising on programmes or banners and room hire or catering if paid on behalf of an HCO). This may also include activities such as preceptorships, where expenses are paid to HCOs or CME providers for arrangement of educational events.
- **Fees:** Transfers of Value that are fees for service resulting from or related to contracts between companies and institutions, organizations or associations of Healthcare Professionals under which such institutions, organizations or associations provide any type of services to a company or any other type of funding not covered in the previous categories. Fees and Transfers of Value relating to expenses agreed in the written agreement covering the activity will be disclosed as two separate amounts, under the 'Fees' and the 'Related expenses agreed in the fee for service or consulting contract' categories.
- **Grants:** Funding or support provided to HCOs in response to a request to support a specific activity that provides educational benefit or enhances patient care.

- **Donations:** Funding (or benefits in kind) provided to HCOs to support research and development.

4.2 Alnylam discloses the following Transfers of Value it makes to **HCPs**:

- **Congress and educational event registration fees:** Expenses related to the registration of an HCP to attend a congress or educational event.
- **Travel:** Expenses related to the provision of travel to HCPs in relation to a fee for service contract or attending a congress or educational events (e.g., rail travel, taxi travel, flights, reimbursement of private car miles).

Where travel expenses are required for the provision of a fee for service, these will be disclosed in the category of 'Related expenses agreed in the fee for service or consulting contract'.

- **Accommodation:** Expenses related to the provision of overnight accommodation of HCPs in relation to a fee for service contract or attending a congress or educational events. These will be disclosed in the category of 'Related expenses agreed in the fee for service or consulting contract'.
- **Fees:** Transfers of Value paid to Healthcare Professionals as compensation for services provided to Alnylam. These may include advisory board services, speaker services or other consulting services. Fees and Transfers of Value relating to expenses agreed in the written agreement covering the activity will be disclosed as two separate amounts, under the 'Fees' and the 'Related expenses agreed in the fee for service or consulting contract' categories.

4.3 Alnylam discloses Transfers of Value to HCPs and HCOs that relate to **research and development** in the aggregate figure. These include expenses associated with clinical trials, non-clinical studies, non-interventional studies and investigator sponsored research.

4.4 Where Alnylam makes a Transfer of Value to an HCP indirectly via an HCO, it discloses such transfer of value against the relevant HCO.

4.5 Where services for Alnylam are rendered by an HCP on behalf of an HCO (for example, Alnylam enters into a service contract with an HCO and the services are provided by the HCO's employee), the associated fees and expenses paid by Alnylam to the HCO are disclosed as Transfers of Value made to the HCO. Where Alnylam can identify the HCP and know that the HCO will make the full Transfer of Value to the HCP on behalf of Alnylam, the Transfer of Value is disclosed against the HCP.

4.6 Where services are provided by a self-incorporated company set up by an HCP, Alnylam will consider the recipient as an HCO and disclose the Transfer of Value to the HCO.

5. COUNTRY OF DISCLOSURE

5.1 Alnylam discloses Transfers of Value based on the HCP/HCO's principal place of practice. If the HCP/HCO operates in more than one country, Alnylam will select one country to be the principal place of practice and disclose Transfers of Value in that country.

6. TIMING

6.1 Alnylam discloses all Transfers of Value it makes between 1 January and 31 December of one year by 30

June of the following year. A Transfer of Value is made when the transfer is complete (e.g., on payment date or transfer of value date). For example, if a contract is signed on 1 October 2019 but the payment is made on 1 January 2020, the Disclosure will be published by end May 2021.

7. CURRENCY

7.1 Alnylam discloses Transfers of Value to HCPs and HCOs who operate in Euro. Where Transfers of Value are made in a currency other than Euro, the amount will be converted into Euro using an annual exchange rate. Amounts disclosed in Euro may therefore vary slightly from the exact amount paid in the local currency.

8. MULTI-YEAR CONTRACTS

8.1 Where a contract for any Transfer of Value listed in Section 4, runs for more than one year, Alnylam will disclose Transfers of Value relating to contracts in the year the Transfer of Value was made (which may be different to the year in which the contract was agreed or when the service was provided).

9. AMOUNT

9.1 Where possible, Alnylam discloses the full amount of all Transfers of Value exclusive of VAT. In some instances for indirect transfers of value, VAT may not be separable, in these cases, VAT has been included in the disclosure amount.

9.2 Transfers of Value to HCPs reflect fair market value, taking into account the nature of services rendered, the amount of time spent, and the knowledge and expertise of the HCP.

9.3 When Alnylam is a party to a co-promotion agreement, Alnylam discloses only Transfers of Value made by Alnylam.

9.4 Transfer of Value made by Alnylam to Italy HCPs and HCOs, irrespective of where the Alnylam entity is located (e.g. transfers of value made by Alnylam entities outside of Italy) are included in the Disclosure report for Alnylam Italy.