



**Methodological Note to  
2021 Disclosure Report  
for  
Patient Organisations**

**Sanofi-Aventis Ireland Limited  
and  
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.

Sanofi is aware and have considered that the 2021 IPHA Code of Practice Edition 8.5 came into force on the 1st of March 2021, and Sanofi have followed the 2021 Code requirements for the annual disclosure of contracted services and sponsorship to patient organisations and when compiling this methodological note.

Criteria and requirements for disclosure are defined in Annex III of the 2021 8.5 edition of the 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 Patient Organisations (PO) 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, and secondly to understand how the PO was recorded and verified for disclosure by Sanofi in Ireland.

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

## 2) WHAT ARE THE IPHA CODE REQUIREMENTS?

Annex III to version 8.5 of the IPHA Code requires that 'each company must make publicly available a list of Patient Organisations to which it provides financial support and/or significant indirect/non financial support. This should include a description of the nature of the support that is sufficiently complete to enable the average reader to form an understanding of the significance of the support. The description must include the monetary value of financial support and of invoiced costs. For significant non-financial support that cannot be assigned a meaningful monetary value the description must describe clearly the non-monetary benefit that the Patient Organisation receives’.

Each company must also make publicly available a list of Patient Organisations that it has engaged to provide significant contracted services.



The IPHA Code requires companies to use the standardised PO Disclosure template available from [www.ipha.ie](http://www.ipha.ie).

### 3) 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.

### 4) WHICH ACTUAL DATES WERE USED FOR DISCLOSURE OF TOV?

The 2021 Disclosure Report includes all Transfers of Value processed by Sanofi to POs between 1<sup>st</sup> January 2021 and 31<sup>st</sup> December 2021.

### 5) HOW WAS THE VAT MANAGED?

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

### 6) CONTACTS

For data protection enquiries please contact Sanofi’s Data Protection Officer at [GB-DataProtection@sanofi.com](mailto: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 2021 Disclosure Report please contact: [GB-Transparency@sanofi.com](mailto:GB-Transparency@sanofi.com)