

Evolus International Ltd

ABPI disclosure of transfers of value to patient organisations and the public for the financial year 2022

Disclosure of support provided to patient organisations and contracted services provided by individuals representing patients organisations

Patient organisation name	Type of support	Type of support	Description	Objective
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Not applicable for 2022

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Members of the public	Fees	Type of support	Description	Objective
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Journalist	GBP 5139.20	Fees for services & OOPs	Series of video recordings	For use on social media
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Evolus International UK Methodological Note

1. Introduction – Evolus' Commitment to Transparency Reporting

Evolus International Ltd, a subsidiary of Evolus Group is an international organisation that research, develops and markets healthcare solutions with a focus on the aesthetic neurotoxin market. It currently operates in 5 countries and employs over 230 people. We are proud of our values that form at the basis of our corporate philosophy.

We regularly work and collaborate with various stakeholders including healthcare professionals (HCPs) Other Relevant DecisionMakers (ORDMs), and healthcare organisations (HCOs) on a range of activities in the interest of our patients. These include but are not limited to the delivery of medical education programmes, receipt of advice on various topics such as medicines development and clinical best practice. These working relationships are essential to gaining the real-world information we need in order to deliver treatment choices that improve the health of patients and to share information that may be relevant to clinical decision making and patient care.

Evolus International believes that transparency is essential to building and maintaining confidence in us and in our product(s), and strongly support the work being done by The European Federation of Pharmaceutical Industries and Associations (EFPIA) and the Association of the British Pharmaceutical Industry (ABPI) Code of Practice, to improve transparency across the pharmaceutical industry. We act with Integrity, Trust, Respect and Transparency. Our full commitment to the highest ethics and integrity standards is a cornerstone of our values and our actions; transparency and openness of our interactions with HCPs, HCOs, and ORDMs is one of the key Evolus core behaviours, leading our way of conducting ourselves and our business.

Evolus International is committed to ensuring that Transparency is respected, demonstrating the integrity of our relationship with HCPs, HCO, disclosing relevant transfers of value to HCPs, HCOs, and ORDMs. This extends to contracted services provided to members of public including expert patients and journalists and media influencers.

We are accountable for compliance with local laws, regulations and the ABPI Code of Practice for tracking and disclosure of ToVs.

Transfers of value (ToVs) made in 2022 by Evolus International Ltd, including any relevant ToVs made by other Affiliates of the Evolus Group to HCPs/ORDMs and HCOs, whose principal address is in the United Kingdom (UK) are published on the ABPI Platform. The report remains in the public domain for a minimum of 3 years after the time such information is first disclosed.

This methodological note describes the key aspects and clarifications on the nature - how the transfers of value included in the disclosure are categorised, and the format in which they are disclosed in accordance with the ABPI Code of Practice.

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2.) Disclosure methodology & Scope

Corporate scope	Evolus International will issue one report for each country showing all Transfers of Value (ToVs) made by that country to HCPs / HCOs by the appropriate Evolus Affiliate as necessitated by the local country regulations.
Disclosure Scope	<p>Included ToVs: Evolus International documents and discloses all relevant Transfers of Value that are related to our prescription-only medicine and that are made, directly or indirectly, to or for the benefit of a Recipient. All TOVs made to HCOs and Individuals (HCPs and ORDMs), are reported in accordance with the specific requirements of the ABPI code of practice as listed in the Transfer of Value Categories Table above.</p> <p>When TOVs are made for an Evolus organised meeting or event, which involves payments to faculty organisations (HCOs) and/or members (HCPs) for the provision of services such as expert speakers, these will be disclosed against the HCO or HCP and not against the HCP attendees as beneficiaries of Non-monetary TOVs for attending the educational meeting.</p> <p>When ToVs are made through a “Third party”, necessary arrangements have been made with third parties to ensure the obligations are fulfilled (e.g., Third parties representing or acting on behalf of Evolus International Ltd, provide Evolus with detailed information of the ToV made to HCPs and HCOs).</p> <p>Excluded ToVs:</p> <ul style="list-style-type: none"> • Costs of meals & drinks - are excluded. However, where meals and drinks make up an integral and inseparable part of contributions to the cost of events or sponsoring as part of Sponsorship Agreements, they have been included in Contributions to Cost of Events. • Items of medical utility for HCPs, informational and educational material and samples - are not disclosed. • ToVs to Patient Organizations/Patient Advocacy Groups (PO/PAG) and non-HCO organisations (e.g., charitable organisations) - are out of scope for this reporting. TOVs made to PO/PAGs are subject to separate reporting requirements and are disclosed separately on the Evolus International website. <p>Logistical costs related to Evolus Organised Meetings (for example, room hire, technical and personnel costs) are excluded. However, ToVs to participants, such as support for travel and accommodation or speaker fees to HCPs are included in the relevant cost category</p>
Reporting Period	This report includes transactions which have a reportable date within the reporting period from 1st Jan – 31st Dec 2022.
Non-Monetary TOVs	Non-monetary TOVs represent the value that Evolus International has contributed to a project, including estimates of the monetary value of such contributions, where relevant.
Reportable Dates	<p>The Reporting Date for Direct/Monetary TOVs 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).</p> <p>The Reporting Date for In-Kind/ Non-monetary TOVs will be the date the recipient received the benefit.</p>

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Value Added Tax (VAT) and other taxes	All transactions are reported in the net amount excluding the VAT and including the withholding tax (if any)
Currency Conversions	The currency of the amounts disclosed in the report is the currency of the country where the disclosure is made, even if the payment of the ToV has been done in a different currency. No ToVs have been made in a different currency for the 2022 disclosure period.
Collaborative Working	Collaborative Working disclosure is based on Transfers of Value made in the reporting year and not the lifetime of the Collaborative or Joint Working project. They represent the value that Evolus has contributed to the project, including estimates of the monetary value of such contributions, where relevant. Evolus has not been involved in any collaborative working projects in 2022.
Grants and Donations (including MEGS)	The TOV disclosure for Grants & Donations including MEGS are based on Transfers of Value made in the reporting year and not the lifetime of the project. They represent the value that Evolus has contributed to the project, including estimates of the monetary value of such contributions, where relevant.
Sponsorships and Travel Support	Where contributions made to HCOs include support for travel & accommodation for HCPs/ORDMs to attend Independent Congresses and the HCPs benefitting from this support are unknown, this payment will be assigned to the category "Sponsorship Agreements". For contributions provided for Events through PCOs, the TOVs are reported in all cases, ToVs are disclosed against the HCO that ultimately benefits
Patient Organisation/Patient Advocacy Group (PO/PAG)	PO's/PAGs will only be included in the disclosure report if they are in scope for reporting as defined in the local country code/law. ToVs to UK PO/PAGs are out of scope for this report and are disclosed separately on the Evolus International website. NB: Evolus has not been involved in any projects with POs/PAGs in 2022.
Research and Development (R&D)	Transfers of Value related to R&D are disclosed in aggregate

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Multi-year contracts	Transfers of Value related to multi-year contracts are captured and reported on the relevant Reporting Date (i.e., payment date), irrespective of the duration of the contract. Only ToV payments made in the reporting period are disclosed.
Cross Border Payments, and Other Evolus Legal Entities and Distributors	<p>Evolus will report one disclosure per market as necessitated by the local regulations, including all ToVs paid directly through entities belonging to Evolus International or indirectly through third parties acting on behalf of Evolus. The report for the UK includes Great Britain & Northern Ireland (UK) and contains all disclosable TOVs of the UK marketed product, made by Evolus in the UK and by any of our affiliates across the world:</p> <ul style="list-style-type: none"> • The disclosure report includes ToVsmade by any other Evolus Group Country to HCPs, ORDMs and HCOs whose address of principal practice or registration is in the UK. • This includes all relevant TOVs made by any Evolus affiliates and legal entities in other countries included in the EFPIA disclosure code.
“No Shows” or Cancellations	<p>Where an HCP/HCO does not receive the benefit due to:</p> <ul style="list-style-type: none"> • A “no show” e.g., occurring when an HCP fails to attend a meeting they were supposed to, the associated costs e.g., the cost of cancelling a hotel booking or accommodation, are not reported if Evolus International is unable to confirm the in-kind benefit was received. • In case of partial attendance, only the benefits received are disclosed. • The cancellation of an Event, possible penalties for annulling a confirmed arrangement or order, and cancellation fees are not disclosed.
Self-incorporated HCPs/ORDMs	Where an individual has set up their own company and they are the sole owner and Evolus has made payments to that company for Services provided by the HCP/ORDM, the ToVs have been disclosed against that individual.
HCPs employed by Evolus	Evolus will not report payments made to HCPs who are employed by Evolus as staff members. Evolus considers that it would be inappropriate to the disclose an employee’s salary, bonus, expenses, and benefits.
Language of disclosure	Disclosure is made in English
Retention of Records	Relevant records of the disclosure are retained for a minimum of 5 years after the end of the relevant Reporting Period.

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3.) Data Protection and Consent Management

Consent to publish & GDPR legal basis for disclosure:

Disclosure of TOV's to Individuals

There are two routes for processing the personal data of individual HCP, ORDMs and other relevant consultants for disclosure - legitimate interest, or consent from the individuals. Evolus International discloses the TOVs to individuals based on their consent to the disclosure of the TOV made to them.

- If the individual provides consent for disclosure, the sum of all ToVs to that individual during the reporting period is disclosed under his/her name according to the specific ToV category.
- If the individual does not provide consent to disclosure, all the ToVs in the reporting period are reported in the “aggregate” section, as part of the sum of all the TOV, without stating the personal details of the individual.

In all cases, the Evolus Privacy Notice is provided to the individuals and is also available in those websites under our control where the TOV are disclosed. We make our best effort to advocate for transparency and explain its societal benefits.

Indirect ToV to Individuals via a third-party: Where individuals have requested that their payment is made to a third party such as their employer, the ToV has been reported as being received by the individual (with consent or in aggregate as stated above) in accordance with the EFPIA and ABPI Code of Practice requirements.

Management of recipient's queries and requests: As the UK disclosure data will be hosted on the ABPI central platform, HCPs/HCOs or ORDMs should in the first case raise queries or requests with the ABPI data management Partner. If data queried by an HCP/ORDM has already been published on the public search, it will be immediately suppressed in the system and will disappear from publication until the query is resolved. HCP/ORDMs will continue to see the queried data within their private Disclosure Portal even if it is under query. Any data queried by HCOs will remain published.

Disclosure of TOV's to HCOs

Evolus International does not obtain consents from HCOs for the disclosure of the transfers of value made to them because legal entities are not subject to personal data protection under the law and therefore the consent collection is not required.

4.) Publication

Publication/Re-publication: Evolus International will publish transparency disclosure reports in line with the timelines as defined by the ABPI code or MHRA guidelines. Re-publication will be carried out as and when needed in line with these codes/laws.

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5.) Definitions

Healthcare Professional (HCP)	<p>The term ‘healthcare professional’ includes members of the medical, dental, pharmacy and nursing professions and any other persons who in the course of their professional activities may administer, prescribe, purchase, recommend or supply a medicine.</p> <p>HCPs relevant to this disclosure of TOVs are those whose primary practice, principal professional address or place of incorporation is in the UK.</p> <p>The definition of HCPs includes:</p> <ol style="list-style-type: none"> 1.any official or employee of a government, agency or other organisation (whether in the public or private sector) that may prescribe, purchase, supply, recommend or administer Medicinal Products and 2.any employee of a Member Company whose primary occupation is that of a practising HCP
Healthcare Organisation (HCO)	<p>The term ‘healthcare organisation’ means either a healthcare, medical or scientific entity, association, or organisation (irrespective of the legal or organisational form) such as 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 the UK, or an organisation through which one or more HCPs or ORDMs provide services.</p>
Other Relevant Decision Makers (ORDMs)	<p>The term ‘other relevant decision makers’ includes those who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply, or use of any medicine, but who are not health professionals per se.</p>
Patient Organisation/Patient Advocacy Group (PO/PAG)	<p>A PO/PAG is a non-for-profit legal person/entity (including the umbrella organisation to which it belongs), mainly composed of patients and/or caregivers, that represents and/or supports the needs of patients and/or caregivers and whose business address, place of incorporation or primary place of operation is in the UK or Europe.</p>
PCO – Professional Conference Organiser	<p>A company/individual specialised in the organization and management of congresses, conferences, seminars, and similar events(all “Events”). Commercial companies involved in organisation of travel(travel agencies) or accommodation (hotels,banqueting functions in hotels, etc.) are not considered PCOs.</p>
Transfer of Value (TOV)	<p>TOVs are economic transfers whether direct or indirect, both in cash or in-kind, carried out for either promotional aims or for the development and commercialisation of pharmaceuticals for human use subject to medical prescription.</p> <p>Evolus International have defined two types of Transfers of Value for Disclosure Reporting purposes:</p> <ol style="list-style-type: none"> 1.A Direct/Monetary Transfer of Value 2.An In-Kind/ Non-monetary Transfer of Value

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Direct and Indirect Transfers of Value	<p>Direct transfers - This is a payment of money made to an HCP/ORDM or HCO by Evolus either directly or through an intermediary (for example, fees for service), for the benefit of the recipient.</p> <p>Indirect transfers – This is a benefit without a monetary payment received from Evolus either directly or through an intermediary (e.g., a flight or fee paid to a travel agent or event’s organiser).</p>
Distributors	<p>A distributor is a contracted 3rd party involved in the distribution and/or promotion of medicines on behalf of Evolus International in an EFPIA country. The activities of any such distributors under Evolus International’s operational control and guidance comply with the necessary legal and regulatory requirements of that country.</p>
Donations and Grants	<p>Donations and Grants are awarded freely to HCOs, POs or registered charities involved in patient support, with nothing in return for Evolus. Grants are financial support provided by Evolus International to an approved organisation for the purposes of achieving a specific defined outcome. Donations include Medical & Educational Goods & Services (MEGS) and are the provision of non-monetary support by Evolus International for the purposes of achieving a specific defined outcome to enhance patient care or benefit the NHS and maintain patient care.</p>
Sponsorships and Travel Support	<p>Sponsorships are contributions provided by Evolus International towards an activity initiated by an independent organisation where Evolus receives something in return. This might include the contribution of costs related to an event by way of registration fees, accommodation, and travel expenses.</p> <p>Evolus Travel Support is support (i.e., travel – flights, train, taxi etc., and registration fees etc.) provided freely to assist HCPs and ORDMs to attend an independent meeting. It includes the provision of a financial contribution, in whole or in part, whether paid directly or indirectly to the individual HCPs or ORDMs to attend such events/meetings and includes the support via an HCO, of HCPs and ORDMs not known to Evolus International:</p> <ul style="list-style-type: none"> • Where these are provided to HCOs, Evolus is not involved in the selection of the HCPs. When provided to individual HCPs/ORDMs, payments may be made directly to the recipient by way of reimbursement for submitted invoices, or to the event organizer, and/ or 3rd party travel/accommodation providers/other Professional Conference Organisers (PCOs).