

Diurnal Limited

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**Disclosure of Transfers of Value Methodology Note for Diurnal 2019**

Statement for the disclosure of 2019 data during the COVID 19 pandemic in 2020

As part of the pharmaceutical industry’s annual disclosure of transfers of value to HCPs, ORDMs and HCOs via the Disclosure UK platform and in order to ensure accuracy of the published data, the ABPI

writes to all of the HCPs, ORDMs and HCOs named in companies’ disclosure data ahead of its publication on Disclosure UK at the end of June. (Over 20,000 in June 2019.)

Given the unprecedented pressure on the NHS and health care professionals in responding to the COVID 19 pandemic, in April 2020 the ABPI and PMCPA agreed that it would not be appropriate for

industry to write to HCPs, ORDMs or HCOs to request that disclosure data be reviewed. Doing so would add additional work for NHS professionals at this time. To avoid this, and in line with guidance

provided by the ABPI, Diurnal’s 2019 transfer of value data has been published on Disclosure UK in aggregate.

Commitment to transparency

The pharmaceutical industry is committed to preserving the integrity of Disclosure UK and transparency in our interactions with HCPs, ORDMs and HCOs. The ABPI continues to explore how the full disaggregated 2019 data can be submitted to Disclosure UK in line with data from previous years.

Diurnal methodology, 2019

Diurnal is a small predominantly research-based company. During 2019 one product was marketed by Diurnal in the UK, Germany and Austria. During this period the same product was marketed in Sweden, Denmark, Norway and Iceland by partner Frost Pharma, who disclose transfers of value as a separate entity. Non- research and development activity was limited to a number of research and educational grants. One of these was to a patient group organisation and is declared separately below. Diurnal had two active product development programmes. Transfers of value relating to these programmes were recorded and consolidated at year end. All payments during the chronological year 2019 were reviewed. The total spend was reviewed with finance functions. The aggregated total is declared on the accompanying spread sheet.

In calculating the aggregated total the following methodologies have been used:

* Amounts declared do not include VAT due to the differing levels of VAT across the areas where Diurnal has clinical trials programmes ongoing.
* Amounts declared are in UK sterling with the conversion rates at the time of reporting.
* All payments worldwide are declared as Diurnal group is headquartered in the UK.
* Where contracts extend beyond a single year, in year payments only are declared.
* Diurnal does not have any over the counter business or medical device business.
* In including worldwide payments, Diurnal goes beyond the requirements of the EFPIA and ABPI codes and the US legislation.
* French payments are additionally declared in accordance with Loi Bertrand on the Diurnal website and through HAS.
* Individual consent has been sought for individual payments to Healthcare professionals with no refusals. Disaggregated 2019 disclosure data are published on the Diurnal website, available here:

<https://www.diurnal.co.uk/non-healthcare-professionals/transparency/overview/>

* As Professor Ross undertakes clinical work, payments and expenses relating to his work with Diurnal as Diurnal Chief Scientific Officer have been declared.
* Diurnal has made no non-monetary transfers of value in 2019.
* Diurnal has no joint working to disclose in 2019

**Unrestricted Educational Grant to Patient Group:**

Netzwerk Hypophysen und Nebennierenerkrankungen (Glandula), Furth, Germany, £1769.48 for meeting sponsorship

**Charitable Donation:**

Funds raised by Diurnal staff on charity cycle ride, Living with CAH, UK, charitable donation £1160