

Observational Study Information

| Title | Pattern of use of Direct Oral Anticoagulants in Non- valvular Atrial Fibrillation patients in UK general practices | | | | |
|-------------------------------------|--|--|--|--|--|
| Protocol version identifier | 1.0 | | | | |
| Date of last version of protocol | 24.02.2017 | | | | |
| IMPACT study number | 19330 | | | | |
| Study type/Study phase | $\square \text{ non-PASS}$ $\boxtimes \text{ PASS} \text{Joint PASS:} \square \text{ YES} \square \text{ NO}$ | | | | |
| Active substance | B01A F DIRECT FACTOR Xa INHIBITORS (B01A F01 RIVAROXABAN, B01A F02 APIXABAN) and B01A E07 DABIGATRAN | | | | |
| Medicinal product | Xarelto, Pradaxa, and Eliquis | | | | |
| Marketing authorization holder(s) | Bayer AG, 51368 Leverkusen | | | | |
| Research question and objectives | Primary Objective To provide baseline characteristics of NVAF patients who are prescribed with any of the three DOACs (rivaroxaban, dabigatran and apixaban) for the first time for stroke prevention, and contrast with the corresponding characteristics of patients in clinical trials. To assess the pattern of use (daily dose, dose posology, treatment duration, na ve status) of rivaroxaban, dabigatran and apixaban in UK for stroke prevention in NVAF patients To assess the proportion of NVAF patients with renal impairment who are prescribed with rivaroxaban, dabigatran, and apixaban at index date including their treatment characteristics (daily dose, dose posology, duration). | | | | |



| | • To determine time-trends in the characteristics of first-time use of rivaroxaban, dabigatran and apixaban in NVAF patients. | | | |
|------------------------|---|--|--|--|
| Country(-ies) of study | United Kingdom | | | |
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Marketing authorization holder

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The study will be conducted in compliance with the protocol and any applicable regulatory requirements.

Throughout this document, symbols indicating proprietary names ([®], TM) may not be displayed. Hence, the appearance of product names without these symbols does not imply that these names are not protected.



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2. List of abbreviations

AF Atrial fibrillation ACR Albumin to Creatinine Ratio ATC Anatomical Therapeutic Chemical (Classification System) **BMI Body Mass Index** CEIFE Centro Español de Investigación Farmacoepidemiológica CI Confidence Interval CKD Chronic Kidney Disease CKD-EPI Chronic Kidney Disease Epidemiology Collaboration DVT Deep Vein Thrombosis eGFR estimated Glomerular Filtration Rate EMA European Medicine Agency ENCePP European Network of Centers in Pharmacoepidemiology and Pharmacovigilance **CPRD** Clinical Practice Reaseach Datalink **GCP Good Clinical Practice** HR Hazard Ratio **IHD Ischemic Heart Diseases INR** International Normalized Ratio LMWH Low molecular weight heparins MAH Marketing Authorization Holder MDRD Modification of Diet in Renal Disease Study MREC Multicenter Research Ethics Committee N/A Not Applicable DOACs new oral anticoagulants NVAF Non valvular Atrial Fibrillation OTC over the counter medications PAD Peripheral Artery Disease PAS Post-Authorization Study PASS Post-Authorization Safety Study PCPs Primary Care Physicians SRC Scientific Research Committee STROBE Strengthening the Reporting of Observational Studies in Epidemiology THIN The Health Improvement Network UK United Kingdom VKAs Vitamin K antagonists



3. Responsible parties

Study initiator and funder / MAH

| Function: | Study conduct responsible and Study Epidemiologist |
|-----------|--|
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| | |

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4. Abstract

Title

Pattern of use of Direct Oral Anticoagulants in Non-valvular Atrial Fibrillation patients in UK general practices

v 1.0, 24 February 2017

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Rationale and background

Individualized anticoagulant treatment should be based on patients' age, renal function, comorbidities, and concomitant treatments. The DOACs are new agents with several advantages including use of fixed-dosing with no need for INR monitoring, few interactions etc. The lack of effective antidote for some of them, their cost, or uncertainties in patients with kidney disease, and associated risk of bleeding may explain reservations in their widespread use (Hinojar et al. 2015).

There is a limited data on prescription and usage patterns of DOACs in routine care for stroke prevention in non-valvular atrial fibrillation (NVAF). Monitoring the usage patterns of DOACs is essential to study compliance with labelling information.

Research question and objectives

This population-based descriptive study will characterize first-time users of three DOACs in NVAF patients for stroke prevention including those renal impaired. Additionally, it will assess patterns of drug utilization in routine general practice in the UK, using the Clinical Practice Research Datalink (CPRD) and The Health Improvement Network (THIN).

Primary Objective

- To provide baseline characteristics of NVAF patients who are prescribed with any of the three DOACs (rivaroxaban, dabigatran and apixaban) for the first time for stroke prevention, and contrast with the corresponding characteristics of patients in clinical trials.
- To assess the pattern of use (daily dose, dose posology, treatment duration, na we status) of rivaroxaban, dabigatran and apixaban in UK for stroke prevention in NVAF patients
- To assess the proportion of NVAF patients with renal impairment who are prescribed with rivaroxaban, dabigatran, and apixaban at index date including their treatment characteristics (daily dose, dose posology, duration).

Secondary Objective

• To determine time-trends in the characteristics of first-time use of rivaroxaban, dabigatran and apixaban in NVAF patients.

Study design



This is a population-based retrospective cohort study designed to assess the characteristics of patients and patterns of drug utilization in new users of DOACs in the UK by merging the CPRD and THIN databases.

The study enrollment period extends from 1st January 2011 up to last available database extraction (at time of writing, May 2016 in THIN and in CPRD).

Among the source population resulting from the combination of THIN and CPRD databases, we will ascertain three separate cohorts of first-time users of rivaroxaban, apixaban and dabigatran using the date of first prescription (index date) of the respective drug (index drug).

This study will apply a new-users (initiators) design (Ray, 2003). New users are individuals starting a study medication for the first time ever recorded in the database. Yet, they may have used the other study medications before index date and therefore classified as non-na we. New-users without any history of any oral anticoagulant would be classified as na we.

Population

All patients aged 18 and above and who have been enrolled in the databases for at least 1 year and had their first prescription recorded in the databases at least 1 year ago will be included in source population. A patient will be considered eligible to enter a study cohort as a first-time user of one the study drugs when he or she has a first prescription of the drug recorded during the enrolment period. Among the three study cohorts, we will further identify patients with Non-valvular Atrial Fibrillation (NVAF).

Variables

Detailed descriptive variables incuding baseline characteristics will be captured for the population, including co-medications and comorbidities. Dose, posology, duration of study drug and other anticoagulant before index date including na ve/non-na ve status. Renal disease using estimated glomerular filtration rate (eGFR) as well as ACR (Albumin/Creatinine Ratio) where available. Also, risk scores, lifestyle factors and healthcare utilization.

Data sources

THIN - The population included in THIN is representative of the UK as a whole in terms of age, sex and geographic distribution. THIN now collects data from 570 practices, covering 6% of the general population of the UK population.

CPRD – It contains diagnostic and prescribing information recorded by GPs as part of their routine clinical practice in the UK. The CPRD has information on 5.4 million individuals (active contributors), which represents approximately 9% of the UK population.

Study size

THIN version1605: The prevalence of NVAF among patients 18+ and register with GP for at least a year is 1.89% (N= 74319).

CPRD GOLD 2014: The prevalence of AF in all ages was 2.47% in men and 1.56% in women.



Data analysis

Describe the three study cohorts i.e. patients prescribed with rivaroxaban, dabigatran, apixaban by baseline characteristics, use of medications, comorbidities and healthcare utilization services among the three study cohorts and contrast them with the baseline characteristics of patients in clinical trials.

Use of study medications: Dose at first Rx, dose posology, duration of treatment (time on index medication), discontinuation, switch to another study drug.

To assess the proportion of patients that are dosed in accordance and non-accordance to label, in study population and in subset of patients with renal impairment

Milestones

The project is planned to begin in February 2017 and will end in April 2017

5. Amendments and updates

None

6. Milestones

This study will be conducted between January 2017 and April 2017

| Milestone | Project timeline |
|--|----------------------|
| Protocol development and submission for review and comment | By end December 2016 |
| Ethics Submission & Approval | By end January 2017 |
| Data Extraction | March 2017 |
| Data Analysis and reporting | April-May 2017 |

7. Rationale and Background

Vitamin K antagonists (VKAs) have been the standard treatment for antithrombotic prevention in atrial fibrillation (AF) in the last 60 years (NICE, 2016). Direct oral anticoagulants (DOACs) have shown to have a favourable balance between efficacy and safety compared with VKAs, and three (rivaroxaban, dabigatran, and apixaban) are now available and approved in the United Kingdom (UK) for the prevention of stroke in non-valvular AF (NVAF) patients.

Two classes of DOACs are currently available, the oral direct thrombin inhibitors (DTIs; e.g. dabigatran) and oral direct factor Xa inhibitors (e.g. rivaroxaban, apixaban, and edoxaban). Unlike VKAs, which block the formation of multiple active vitamin K-dependent coagulation factors (factors II, VII, IX, and X), these drugs block the activity of one single step in the coagulation cascade.



Individualized anticoagulant treatment should be based on patients' age, renal function, comorbidities, and concomitant treatments. The DOACs are new agents with several advantages including use of fixed-dosing with no need for INR monitoring, few interactions etc. The lack of effective antidote for some of them, their cost, or uncertainties in patients with kidney disease, and associated risk of bleeding may explain reservations in their widespread use (Hinojar et al. 2015).

There is a limited data on prescription and usage patterns of DOACs in routine care for stroke prevention in non-valvular atrial fibrillation (NVAF). Monitoring the usage patterns of DOACs is essential to study compliance with labelling information.

8. Research question and objectives

This population-based descriptive study will characterize first-time users of three DOACs in NVAF patients for stroke prevention including those renal impaired. Additionally, it will assess patterns of drug utilization in routine general practice in the UK, using the Clinical Practice Research Datalink (CPRD) and The Health Improvement Network (THIN).

8.1 Primary Objective

- To provide baseline characteristics of NVAF patients who are prescribed with any of the three DOACs (rivaroxaban, dabigatran and apixaban) for the first time for stroke prevention, and contrast with the corresponding characteristics of patients in clinical trials.
- To assess the pattern of use (daily dose, dose posology, treatment duration, na we status) of rivaroxaban, dabigatran and apixaban in UK for stroke prevention in NVAF patients
- To assess the proportion of NVAF patients with renal impairment who are prescribed with rivaroxaban, dabigatran, and apixaban at index date including their treatment characteristics (daily dose, dose posology, duration).

8.2 Secondary Objective

To determine time-trends in the characteristics of first-time use of rivaroxaban, dabigatran and apixaban in NVAF patients.

9. Research methods

9.1 Study design

This is a population-based retrospective cohort study designed to assess the characteristics of patients and patterns of drug utilization in new users of DOACs in the UK.

The study enrollement period extends from 1st January 2011 up to last available database extraction (at time of writing, May 2016 in THIN and in CPRD).

Among the source population resulting from the combination of THIN and CPRD databases, we will ascertain three separate cohorts of first-time users of rivaroxaban, apixaban and dabigatran using the date of first prescription (index date) of the respective drug (index drug).



This study will apply a new-users (initiators) design (Ray et al, 2003). New users are individuals starting a study medication for the first time ever recorded in the database. Yet, they may have used the other study medications before index date and therefore classified as non-na we. New-users without any history of any oral anticoagulant would be classified as na we.

All patients aged 18 and above and who have been enrolled in the databases for at least 1 year and had their first prescription recorded in the databases at least 1 year ago will be included in source population. A patient will be considered eligible to enter a study cohort as a first-time user of one the study drugs when he or she has a first prescription of the drug recorded during the enrolment period.

Patients who have any record of being prescribed their index drug prior to the enrolment period or who qualify as members of more than one cohort on the same day, will be excluded. If a patient qualifies as first-time user of more than one study drug during the enrolment period, with different index dates, she/he will be assigned to the cohort of study drug first prescribed during the enrolment period, with the date of this prescription being the index date. (eg mutually exclusive cohorts)

Among the three study cohorts, we will further identify patients with NVAF defined as:-

Patients with a record of Atrial fibrillation (AF) any time prior index date or within the 2 weeks after the index date, and free of valvular replacement or mitral stenosis prior to index date or 2 weeks after index-date

9.1.1 Primary end-points

- 1. Baseline characteristics of NVAF patients in the UK prescribed any of the three direct oral anticoagulants (DOACs) (rivaroxaban, dabigatran and apixaban) for the first time for stroke prevention
- 2. Daily dose, dose posology, na we status, treatment duration of DOACs for stroke prevention in NVAF patients including those with renal impairment

9.1.2 Secondary end-point

1. Time-trends in the characteristics of first-time use of DOACs in NVAF patients

9.2 Setting

All patients aged >= 18 years with at least one year of enrollment with the PCP and one year since first health contact recorded in the database (THIN or CPRD) prior to index prescription date.

In the UK, nearly all residents are registered in a general medical practice that uses electronic medical records, grouped in databases that are available for research projects. The CPRD and THIN are two similarly structured, de-identified electronic medical record databases in the UK. To increase the number of patients available, both data sources would be pooled. Combining CPRD and THIN data will increase the size relative to the CPRD alone by approximately 25 to 30%. However, some practices provide data to both databases, therefore duplicate patients would be identified to avoid double-counting patients.



Among duplicate practices, it is anticipated that due to availability of free-text, the information from THIN will be retained. Therefore, we will use all THIN practices and only the information from CPRD practices that do not contribute to THIN. To identify and exclude duplicated practices between THIN and CPRD, and matching of anonymized patient characteristics will be applied (Cai et al., 2012, Garc & Rodr guez et al., 2014).

9.3 Variables

The following variables will be collected among the three study cohorts of DOACs:

- age and sex distribution at index date;
- dose of index drug at index date, dose posology, and duration of treatment (including pack size);
- type and duration of other anticoagulant use before the index date
- prior anticoagulation (DOACs, warfarin and LMWH) before index date: proportion of na we patients (defined as those with no use of any anticoagulant ever prior to index date)
- use of specifically prescribed medications both in the year before the index date and year after the index date: antiplatelet drugs (low-dose acetylsalicylic acid, clopidogrel, dipyridamole, prasugrel, ticlopidine and ticagrelor); anticoagulants (including rivaroxaban, dabigatran, apixaban, warfarin, and LMWH), antiarrhythmic drugs, antihypertensive drugs, statins, anti-diabetic agents, non-steroidal anti-inflammatory drugs, oral steroids, acid-suppressive drugs, disease-modifying anti-rheumatic drugs, antidepressants, antipsychotic drugs, oral contraceptives, hormone-replacement therapy, strong inhibitors of either cytochrome P450 3A4 or P-glycoprotein (e.g. the systemic azole antimycotics ketoconazole, itraconazole, voriconazole and posaconazole and the HIV-protease inhibitor ritonavir), strong CYP3A4 inducers (e.g. rifampicin, phenytoin, carbamazepine or phenobarbital) and fluconazole.
- Renal disease (estimated glomerular filtration rate (eGFR) before index date as well as ACR (Albumin/Creatinine Ratio) where available.
- Comorbidity: haemorrhagic disease and history of intracranial haemorrhage, urogenital bleeding and gastrointestinal bleeding. Liver disease, pancreatic disease, cancer, cardiovascular disease (acute MI, coronary artery disease, congestive heart failure, ventricular arrhythmia, peripheral arterial disease) cardiovascular risk factors (hypertension, diabetes mellitus, hyperlipidaemia and obesity), stroke/TIA, respiratory disease (asthma and chronic obstructive pulmonary disease), rheumatoid arthritis, osteoarthritis, gastrointestinal disease, liver disease and pancreatic, alcohol-related disorders.
- CHADS2 and CHA₂DS₂Vasc scores will be calculated based on the presence/ history of congestive heart failure, hypertension, age, diabetes mellitus and prior stroke or transient ischaemic attack. HAS-BLED score for major bleeding risk (hypertension, renal disease, liver disease, stroke history, prior major bleeding or predisposition to bleeding, age > 65, medication usage predisposing to bleeding, alcohol usage history), will also be calculated.



- smoking status, body mass index (BMI) and Townsend score: most recently recorded value before the index date.
- healthcare utilization in the year prior to the index date and the year after (e.g. PCP visits, outpatient visits and hospital admissions).

| Parameter | Description/ Definition | | | | |
|---|--|--|--|--|--|
| Demographic Characteristics at index date | • Age | | | | |
| | • Sex | | | | |
| | Smoking status (previous 6 months) | | | | |
| | Body mass index (previous 6 months) | | | | |
| | Blood pressure history (previous 12 months) | | | | |
| | Number of patients that are naïve vs non-naïve | | | | |
| | • For non-naïve: type and duration of anticoagulant used before index date | | | | |
| Risk factor categories | CHADS ₂ score | | | | |
| | CHA ₂ DS ₂ VASC | | | | |
| | HASBLED score | | | | |
| | INR measurement | | | | |
| Previous medical history (12 months prior to | Acute MI | | | | |
| index date) | Stroke or TIA | | | | |
| | Systemic peripheral arterial embolism | | | | |
| | Coronary artery disease | | | | |
| | Congestive heart disease | | | | |
| | Hypertension | | | | |
| | Diabetes | | | | |
| | Renal disease (eGFR) or ACR (Albumin/Creatinine Ratio) | | | | |
| Previous medication history (within previous 12 | Anti-arrhythmics | | | | |
| months of index date) | Statins | | | | |
| | Anti-platelets | | | | |
| | Beta-blockers | | | | |
| | ACE inhibitors | | | | |
| | Anti-diabetic agents | | | | |
| | Non-steroidal anti-inflammatory drugs (NSAIDs) | | | | |
| | Antacids | | | | |
| | Histamine receptor antagonists | | | | |
| | Proton pump inhibitors (PPIs) | | | | |
| | Disease-modifying anti-rheumatic drugs (DMARDs) | | | | |
| | Antidepressants | | | | |
| | Antipsychotic agents | | | | |
| | Oral contraceptives | | | | |



| | Hormone replacement therapy (HRT) Strong inhibitors of Cytochrome P450 or P-GP |
|--|---|
| | Strong inducers of CYP3A4 |
| Previous use of VKA (ever prior to index date) | • Warfarin |
| | Other Vitamin K antagonist(s) |
| Concurrent (from index date) co-medication | Anti-coagulants |
| | • Aspirin |
| | Clopidogrel |
| | Other |

9.4 Data sources

THIN

Established in 2002, THIN now collects data from 570 practices, covering 6% of the general population, with more than 65 million patient-years of experience (CSD Medical Research, 2012). Eleven million individual patients are represented in the data; of those, approximately one-third are active at any one time. THIN records information on all services provided by the PCP, and information on specialist visits and hospitalizations are routinely forwarded to the PCP, who enters that information into the medical record. The population included in THIN is representative of the UK as a whole in terms of age, sex and geographic distribution (Bourke, Dattani et al. 2004; Blak, Thompson et al. 2011). THIN has been extensively validated for use in pharmacoepidemiology (Lewis, Schinnar et al. 2007).

The Read classification is used to code specific diagnoses as reasons for each consultation (O'Neil, Payne et al. 1995; Stuart-Buttle, Read et al. 1996), and a drug dictionary based on data from the MULTILEX classification is used to record prescriptions (First Data Bank 2014).

CPRD

The CPRD (http://www.cprd.com/intro.asp) contains diagnostic and prescribing information recorded by GPs as part of their routine clinical practice in the UK. The CPRD has information on 5.4 million individuals (active contributors), which represents approximately 9% of the UK population. These data are linkable, at least partially, with other health care data sets (e.g., hospitalization and national mortality data). Updated, valid, linked data are available through the CPRD Division of the UK Medicines and Health Care Products Regulatory Agency.

As in THIN, The CPRD also includes information recorded by GPs on patient demographics and lifestyle factors and detailed information on prescriptions written by the PCP. Free text comments are not available in CPRD.



The CPRD patients are representative of the UK population in terms of age and sex; it has been validated previously for use in pharmacoepidemiology to address a wide range of study questions in the European population (Herrett et al. 2015). Research at the CPRD requires approval from the CPRD Independent Scientific Advisory Committee (ISAC).

9.5 Study size

<u>THIN version1605</u>: The prevalence of AF (2011-2016), among patients 18+ and register with GP for at least a year 1.92% (No. of patients with AF= 75784). The prevalence of AF excluding patients with prior Mitral Stenosis or Valvular replacement = 1.89% (N= 74319).

<u>CPRD GOLD database in 2014</u>: authors reported a prevalence AF in all ages was 2.47% in men and 1.56 % in women. (<u>Bhatnagar</u> et al, 2015).

A study conducted using CPRD by Johnson et al, 2016, identified 541 na we apixaban users, 1589 na we rivaroxaban users, and 741 na we dabigatran users up to October 2014.

9.6 Data Management

For each study project, all material including: study protocol, copy of Scientific Review Committee approval, algorithms and data collections, datasets, STATA programs, results from validation exercises and questionnaires, final STATA programs, and final report and publications are kept in one folder cross-shared by the CEIFE team. Monthly back-ups are performed and kept in a secure location, and all material is kept for a minimum of 10 years.

As a standard process, one researcher prepares the list of codes, test the computer algorithms to be used and runs statistical analysis after agreement on all phases of analyses with the rest of the team. As one measure of quality control, another researcher independently performs several checks in reviewing commands and analyses performed in order to minimise data errors.

9.6.1 Strategy for handling missing data

As a general strategy, no data imputation strategies will be applied to supplement missing data. The requirement for inclusion is complete data for critical variables; otherwise this individual is not eligible to be a member of the study population. However, missing values may occur in a small proportion. In this case, individuals with missing values will be kept in the analysis and a separate category will be created for missing values of that variable.

9.7 Data analysis

The analysis will be based on descriptive statistics: frequencies and percentages will be calculated to the variables of interests, continuous and count variables will be described using mean (±standard deviation), proportions, median (quartiles) and minimum and maximum values. 95% confidence intercals will be computed for descriptive variables. The following outcomes will be assessed:

• Describe the three study cohorts i.e. patients prescribed with rivaroxaban, dabigatran, apixaban by baseline characteristics, use of medications, comorbidities and healthcare utilization services



(see all the variables in section 9.3) among the three study cohorts and contrast them with the baseline characteristics of patients in clinical trials.

- Use of study medications: Dose at first Rx, dose posology, duration of treatment (time on index medication), discontinuation, switch to another study drug.
- To assess the proportion of patients that are dosed in accordance and non-accordance to label, in study population and in subset of patients with renal impairment
- Contrasting patient characteristics of those prescribed DOACs with the corresponding characteristics in patients participating in clinical trials.

Table 1: Dosing of each study drug in the study population.

| | Rivaroxaban | Apixaban | Dabigatran |
|--------------------------|-------------|----------|------------|
| Low dose | | | |
| Renal impairment | | | |
| Other indication to | | | |
| reduce the dose | | | |
| Non- accordance to label | | | |
| Standard dose | | | |
| incl.documented renal | | | |
| impairment | | | |
| All | | | |

- Use of medication before index date will be categorized as:
 - Concurrent use (when the drug supply lasts until index date or is prescribed at indexdate)
 - Recent (when the drug supply ends 1-30 days before index date)
 - Past use (when the drug supply ends 31-365 days before index date)
 - Non-use: no use in year before index date

9.8 Quality control

Standard operating procedures at research centre will be used to guide the conduct of the study. These procedures include internal quality audits, rules for secure and confidential data storage, methods to maintain and archive project documents, quality control procedures for programming, standards for writing analysis plans, and requirements for senior scientific review.

All programming written by the executing researcher will be reviewed independently by a senior researcher. All key study documents, such as study reports, will undergo quality control and senior scientific review.

Privacy issues will be addressed and respected at each stage of the study. All analyses and reporting will be done on appropriately de-identified data. The Company will not receive any patient or



provider identifiable information from CEIFE at any time. We will abide by the Guidelines for Good Pharmacoepidemiology Practices. The study protocol is dependent on approval by a Scientific Research Committee (SRC) that review studies performed in THIN

9.9 Limitations

- Given the nature of real-world data, missing data are likely to be present in a minority of instances.
- Only prescriptions captured in the CPRD and THIN dataset will be available. Medications prescribed at hospital will not be captured nor will over the counter medications (OTC).
- Incomplete data concerning medication compliance: drug use is based on prescriptions written by the treating physician, but no information is available to confirm if the drug was actually taken by the patient (common to virtually any computerized clinical database).
- There may be some missing data if GPs may not enter the hospitalization data however we expect that the vast majority of GPs will record information on hospitalization into THIN or CPRD (in practices not linked to HES).
- Some lifestyle variables such as smoking, BMI and alcohol consumption is not consistently recorded for all patients.
- The results from the three study cohorts should be interpreted with care, as in the presence of confounding, any findings cannot simply be attributed to the treatments defining the cohorts.

9.10 Other aspects

None

10. Protection of human subjects

This study protocol will be approved by a Research Ethics Committee (REC), and the study will be conducted in accordance with Good Pharmacoepidemiology Practices. We will send the study protocol to the Multicenter Research Ethics Committee (MREC). In this investigation we will use a medical record linkage database where the information of patients is anonymized and there is no need to obtain informed consent from patients.

Centro Español de Investigación Farmacoepidemiológica (CEIFE) will comply with all applicable data protection, security and privacy laws, rules and regulations with respect to the collection, production, use, processing, storage, transfer, modification, deletion, and/or disclosure of any information related to this study under this Agreement. CEIFE will ensure that information is not disclosed or transferred to any third party not mentioned in this protocol. CEIFE will ensure that appropriate technical and organizational measures are taken to protect information against accidental or unlawful destruction or accidental loss or alteration, or unauthorized disclosure or access and against all other unlawful forms of processing. CEIFE will store the Database used to perform this study at the premises of CEIFE. Privacy issues will be addressed and respected at each stage of the



study. All analyses and reporting will be done on appropriately de-identified data and only in aggregate form. We will abide by the Guidelines for Good Pharmacoepidemiology Practices(31). The study protocol is dependent on approval by a Scientific Research Committee (SRC) for studies performed in THIN

11. Management and reporting of adverse events/adverse reactions

As per the EMA Guideline on Good Pharmacovigilance Practices (Module VI–Management and reporting of adverse reactions to medicinal products), for non-interventional study designs that are based on secondary use of data, individual reporting of adverse reactions is not required. Reports of adverse events/reactions will be summarized in the study report (European Medicines Agency 2012).

12. Plans for disseminating and communicating study results

At least one manuscript based on the findings from this project will be submitted for publication to a peer-review journal.

Study results will be published following guidelines of the International Committee of Medical Journal Editors (ICMJE, 2013), and communication in appropriate scientific venues will be considered.

When reporting results of this study, the appropriate STROBE checklist (STROBE, 2007) will be followed.

13. List of references

- Atrial fibrillation: the management of atrial fibrillation NICE Clinical Guidelines (CG180) 2014 available at <u>https://www.nice.org.uk/guidance/cg180/evidence/atrial-fibrillation-update-full-guideline-243739981</u> accessed 15th Feb 2016. Page 15
- <u>Bhatnagar</u>, P et al, The epidemiology of cardiovascular disease in the UK 2014. Heart doi:10.1136/heartjnl-2015-307516
- Blak, B. T., M. Thompson, et al. (2011). "Generalisability of The Health Improvement Network (THIN) database: demographics, chronic disease prevalence and mortality rates." <u>Inform Prim Care</u> 19(4): 251-255.
- Bourke, A., H. Dattani, et al. (2004). "Feasibility study and methodology to create a qualityevaluated database of primary care data." <u>Inform Prim Care</u> **12**(3): 171–177
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- Hinojar R, Jimenez-Natcher JJ, Fernandez-Golfin C, and Zamorano JJ: New oral anticoagulants: a practical guide for physicians. European Heart Journal Cardiovascular Pharmacotherapy (2015) 1, 134–145 doi:10.1093/ehjcvp/pvv002
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- Ray WA. Evaluating medication effects outside of clinical trials: new-user designs. Am J Epidemiol. 2003 Nov 1;158(9):915-20.
- Strobe. Strobe statement strengthening the reporting of observational studies in epidemiology. 2007 [[accessed 5 October 2016]. Available from: <u>http://www.strobe-statement.org</u>.
- ISPE. (2007). "Guidelines for good pharmacoepidemiology practices (second revision)." Retrieved 10 Oct, 2010, from <u>http://www.pharmacoepi.org/resources/guidelines_08027.cfm</u>
- European Medicines Agency (2012) "Guideline on good pharmacovigilance practices (GVP) Module VI – Management and reporting of adverse reactions to medicinal products."
- Johnson ME, Lefèvre C, Collings SL, Evans D, Kloss S, Ridha E, Maguire A. Early realworld evidence of persistence on oral anticoagulants for stroke prevention in non-valvular atrial fibrillation: a cohort study in UK primary care. BMJ Open. 2016 Sep 26;6(9):e011471.



Annex 1. List of stand-alone documents

None



Annex 2. ENCePP checklist for study protocols

ENCePP Checklist for Study Protocols (Revision 2, amended)

Adopted by the ENCePP Steering Group on 14/01/2013; Doc.Ref. EMA/540136/2009

Study title:

Pattern of use of Direct Oral Anticoagulants in Non-valvular Atrial Fibrillation patients in UK general practices

Study reference number:

| Section 1: Milestones | Yes | No | N/A | Page Number(s) |
|---|-------------|-------------|-----------|-------------------|
| 1.1 Does the protocol specify timelines for | | | | |
| 1.1.1 Start of data collection ¹ | \boxtimes | | | 8 |
| 1.1.2 End of data collection ² | \boxtimes | | | 8 |
| 1.1.3 Study progress report(s) | | | \square | |
| 1.1.4 Interim progress report(s) | | | \square | |
| 1.1.5 Registration in the EU PAS register | | \boxtimes | | |
| 1.1.6 Final report of study results. | \boxtimes | | | 8 |

Comments:

The study is not yet registered in the EU PAS register however will be registered soon.

| Section 2: Research question | Yes | No | N/A | Page Number(s) |
|---|-----------|----|-----|-------------------|
| 2.1 Does the formulation of the research question and objectives clearly explain: | | | | |
| 2.1.1 Why the study is conducted? (e.g. to address an important public health concern, a risk identified in the | | | | 9 |
| risk management plan, an emerging safety issue) 2.1.2 The objective(s) of the study? | | | | 9 |
| 2.1.3 The target population? (i.e. population or subgroup to whom the study results are intended to be generalised) | \square | | | 10 |

 $^{^1}$ Date from which information on the first study is first recorded in the study dataset or, in the case of secondary use of data, the date from which data extraction starts.

² Date from which the analytical dataset is completely available.



| Section 2: Research question | Yes | No | N/A | Page Number(s) |
|--|-----|----|-------------|-------------------|
| 2.1.4 Which formal hypothesis (-es) is (are) to be tested?2.1.5 If applicable, that there is no <i>a priori</i> hypothesis? | | | \boxtimes | |
| | | | \square | |

| Section 3: Study design | Yes | No | N/A | Page Number(s) |
|---|-------------|----|-----|-------------------|
| 3.1 Is the study design described? (e.g. cohort, case-control, randomised controlled trial, new or alternative design) | \boxtimes | | | 10 |
| 3.2 Does the protocol specify the primary and secondary (if applicable) endpoint(s) to be investigated? | | | | |
| 3.3 Does the protocol describe the measure(s) of effect? (e.g. relative risk, odds ratio, deaths per 1000 person-years, absolute risk, excess risk, incidence rate ratio, hazard ratio, number needed to harm (NNH) per year) | | | | |

| Section 4: Source and study populations | Yes | No | N/A | Page Number(s) |
|--|-----|----|-----|----------------------------------|
| 4.1 Is the source population described? | | | | 10-11 |
| 4.2 Is the planned study population defined in terms of: 4.2.1 Study time period? 4.2.2 Age and sex? 4.2.3 Country of origin? 4.2.4 Disease/indication? 4.2.5 Co-morbidity? 4.2.6 Seasonality? | | | | 10-11 10-11 10-11 10-11 |
| 4.3 Does the protocol define how the study population will be sampled from the source population? (e.g. event or inclusion/exclusion criteria)Comments: | | | | 10-11 |

| Section 5: Exposure definition and measurement | Yes | No | N/A | Page Number(s) |
|--|-----|----|-----|-------------------|
| 5.1 Does the protocol describe how exposure is defined and | | | | |



| Section 5: Exposure definition and measurement | Yes | No | N/A | Page Number(s) |
|--|-------------|-------------|-----------|-------------------|
| measured? (e.g. operational details for defining and categorising exposure) | | | | 10-11 |
| 5.2 Does the protocol discuss the validity of exposure measurement? (e.g. precision, accuracy, prospective ascertainment, exposure information recorded before the outcome occurred, use of validation sub-study) | | \boxtimes | | |
| 5.3 Is exposure classified according to time windows? (e.g. current user, former user, non-use) | \boxtimes | | | 15 |
| 5.4 Is exposure classified based on biological mechanism of action and taking into account the pharmacokinetics and pharmacodynamics of the product? | | | | |
| 5.5 Does the protocol specify whether a dose-dependent or duration-dependent response is measured? | | | \square | |
| Comments: | | | | |

| Section 6: Endpoint definition and measurement | Yes | No | N/A | Page Number(s) |
|---|-------------|----|-----|-------------------|
| 6.1 Does the protocol describe how the endpoints are defined and measured? | \boxtimes | | | 11-13 |
| 6.2 Does the protocol discuss the validity of endpoint measurement? (e.g. precision, accuracy, sensitivity, specificity, positive predictive value, prospective or retrospective ascertainment, use of validation sub-study) | | | | |

| Section 7: Confounders and effect modifiers | Yes | No | N/A | Page Number(s) |
|---|-----|----|-------------|-------------------|
| 7.1 Does the protocol address known confounders? (e.g. collection of data on known confounders, methods of controlling for known confounders) | | | \boxtimes | |
| 7.2 Does the protocol address known effect modifiers? (e.g. collection of data on known effect modifiers, anticipated direction of effect) | | | \boxtimes | |
| Comments: | | | | |



| Section 8: | Data sources | Yes | No | N/A | Page Number(s) |
|--|--|-------------|-----------|-----|-------------------|
| 8.1 Does the study f | he protocol describe the data source(s) used in the for the ascertainment of: | | | | |
| 8.1.1 E practic | Exposure? (e.g. pharmacy dispensing, general e prescribing, claims data, self-report, face-to-face | \square | | | 11-14 |
| intervi 8.1.2 E | ew, etc.) Endpoints? (e.g. clinical records, laboratory | \square | | | 11-14 |
| marken intervi statisti | rs or values, claims data, self-report, patient ew including scales and questionnaires, vital cs, etc.) | | | | 11-14 |
| 8.1.3 C | Covariates? | | | | |
| 8.2 Does the from the | he protocol describe the information available ne data source(s) on: | | | | |
| 8.2.1 E quantit daily d | Exposure? (e.g. date of dispensing, product by, dose, number of days of supply prescription, (osage, prescriber) | \boxtimes | | | 13-14 |
| 8.2.2 E | Endpoints? (e.g. date of occurrence, multiple event, | | \square | | |
| severit 8.2.3 C history | y measures related to event) Covariates? (e.g. age, sex, clinical and product use y, co-morbidity, co-medications, life style, etc.) | | | | 13-14 |
| 8.3 Is a co | ding system described for: | | | | |
| 8.3.1 E Diseas | Diseases? (e.g. International Classification of es (ICD)-10) | | | | 13-14 |
| 8.3.2 E Activit | Endpoints? (e.g. Medical Dictionary for Regulatory ties (MedDRA) for adverse events) | | | | 13-14 |
| 8.3.3 E Therap | Exposure? (e.g. WHO Drug Dictionary, Anatomical beutic Chemical (ATC)Classification System) | | | | 13-14 |
| 8.4 Is the l (e.g. ba | inkage method between data sources described? ased on a unique identifier or other) | \boxtimes | | | 10-11 |

| Yes | No | N/A | Page Number(s) |
|-----|-----|-------------|--|
| | | \boxtimes | |
| | | | |
| | Yes | Yes No | YesNoN/AImage: Image: Image |



| Section 10: Analysis plan | Yes | No | N/A | Page Number(s) |
|---|-----------|----|-------------|-------------------|
| 10.1 Does the plan include measurement of excess risks? | | | \boxtimes | |
| 10.2 Is the choice of statistical techniques described? | \square | | | 14-15 |
| 10.3 Are descriptive analyses included? | \square | | | 11-15 |
| 10.4 Are stratified analyses included? | \square | | | 11-15 |
| 10.5 Does the plan describe methods for adjusting for confounding? | | | \boxtimes | |
| 10.6 Does the plan describe methods addressing effect modification? | | | \boxtimes | |
| | | | | |

| Section 11: Data management and quality control | Yes | No | N/A | Page Number(s) |
|---|-------------|----|-----|-------------------|
| 11.1 Is information provided on the management of missing data? | \boxtimes | | | 15 |
| 11.2 Does the protocol provide information on data storage? (e.g. software and IT environment, database maintenance and anti-fraud protection, archiving) | | | | 14-15 |
| 11.3 Are methods of quality assurance described? | \square | | | 14-15 |
| 11.4 Does the protocol describe possible quality issues related to the data source(s)? | \boxtimes | | | 14-15 |
| 11.5 Is there a system in place for independent review of study results? | | | | |
| Commontor | | | | |

| Section 12: Limitations | Yes | No | N/A | Page Number(s) |
|---|-------------|----|-----|-------------------|
| 12.1 Does the protocol discuss: 12.1.1 Selection biases? 12.1.2 Information biases? (e.g. anticipated direction and magnitude of such biases, validation sub-study, use of validation and external data, analytical methods) | \boxtimes | | | 15-16 15-16 |



| Section 12: Limitations | Yes | No | N/A | Page |
|--|-----|----|-------------|-----------|
| | | | | Number(s) |
| 12.2 Does the protocol discuss study feasibility? (e.g. sample size, anticipated exposure, duration of follow-up in a cohort study, patient recruitment) | | | \boxtimes | |
| 12.3 Does the protocol address other limitations? | | | | 15-16 |
| 0 | | | | |

| Section 13: Ethical issues | Yes | No | N/A | Page Number(s) |
|--|-----------|-------------|-----|-------------------|
| 13.1 Have requirements of Ethics Committee/Institutional Review Board approval been described? | | | | 16 |
| 13.2 Has any outcome of an ethical review procedure been addressed? | | \boxtimes | | |
| 13.3 Have data protection requirements been described? | \square | | | 16 |
| Comments: | | | | |

The application to the ethics approval is still pending

| Section 14: Amendments and deviations | Yes | No | N/A | Page Number(s) |
|--|-----------|----|-----|-------------------|
| 14.1 Does the protocol include a section to document future amendments and deviations? | \square | | | 8 |

Comments:

| Section 15: Plans for communication of study results | Yes | No | N/A | Page Number(s) |
|---|-------------|----|-------------|-------------------|
| 15.1 Are plans described for communicating study results (e.g. to regulatory authorities)? | | | \boxtimes | |
| 15.2 Are plans described for disseminating study results externally, including publication? | \boxtimes | | | 17 |

Comments:

Name of the main author of the protocol: <u>Gunnar Brobert</u>

Date: 24/01/2017

Signature: _____



Annex 3. Additional information

List of Read Codes



| Table S1. | | | | | | |
|-----------|-------------|---------------------------------|----------|-----------------------|-------|-------------|
| Multilex | BNF-code | Generic Name | ATC | ATC name | BCD | BCD name |
| code | | | | | | |
| 53246979 | 02.08.02.00 | Apixaban 5mg tablets | B01A | ANTITHROMBOTIC AGENTS | 60396 | APIXABAN |
| 53247979 | 02.08.02.00 | Apixaban 5mg tablets | B01A | ANTITHROMBOTIC AGENTS | 60396 | APIXABAN |
| 81167998 | 02.08.02.00 | Apixaban 2.5mg tablets | B01A F02 | APIXABAN | 60396 | APIXABAN |
| 81168998 | 02.08.02.00 | Apixaban 2.5mg tablets | B01A F02 | APIXABAN | 60396 | APIXABAN |
| 81214998 | 02.08.02.00 | Dabigatran etex150mg cap | B01A E07 | DABIGATRAN ETEXILATE | 60278 | DABIGATRAN |
| 81215998 | 02.08.02.00 | Dabigatran etexilate 150mg caps | B01A E07 | DABIGATRAN ETEXILATE | 60278 | DABIGATRAN |
| 83971998 | 02.08.02.00 | Dabigatran etexilate 110mg caps | B01A E07 | DABIGATRAN ETEXILATE | 60278 | DABIGATRAN |
| 83972998 | 02.08.02.00 | Dabigatran etexilate 75mg caps | B01A E07 | DABIGATRAN ETEXILATE | 60278 | DABIGATRAN |
| 83973998 | 02.08.02.00 | Dabigatran etexilate 75mg caps | B01A E07 | DABIGATRAN ETEXILATE | 60278 | DABIGATRAN |
| 83974998 | 02.08.02.00 | Dabigatran etexilate 110mg caps | B01A E07 | DABIGATRAN ETEXILATE | 60278 | DABIGATRAN |
| 59454978 | 02.08.02.00 | Rivaroxaban 2.5mg tablets | B01A F01 | RIVAROXABAN | 60320 | RIVAROXABAN |
| 60767979 | 02.08.02.00 | Rivaroxaban 20mg tablets | B01A F01 | RIVAROXABAN | 60320 | RIVAROXABAN |
| 60768979 | 02.08.02.00 | Rivaroxaban 20mg tablets | B01A F01 | RIVAROXABAN | 60320 | RIVAROXABAN |
| 60769979 | 02.08.02.00 | Rivaroxaban 15mg tablets | B01A F01 | RIVAROXABAN | 60320 | RIVAROXABAN |
| 60770979 | 02.08.02.00 | Rivaroxaban 15mg tablets | B01A F01 | RIVAROXABAN | 60320 | RIVAROXABAN |
| 80953998 | 02.08.02.00 | Rivaroxaban 20mg tablets | B01A F01 | RIVAROXABAN | 60320 | RIVAROXABAN |
| 80954998 | 02.08.02.00 | Rivaroxaban 20mg tablets | B01A F01 | RIVAROXABAN | 60320 | RIVAROXABAN |
| 80955998 | 02.08.02.00 | Rivaroxaban 15mg tablets | B01A F01 | RIVAROXABAN | 60320 | RIVAROXABAN |
| 80956998 | 02.08.02.00 | Rivaroxaban 15mg tablets | B01A F01 | RIVAROXABAN | 60320 | RIVAROXABAN |
| 83418998 | 02.08.02.00 | Rivaroxaban 10mg tablets | B01A F01 | RIVAROXABAN | 60320 | RIVAROXABAN |
| 83425998 | 02.08.02.00 | Rivaroxaban 10mg tablets | B01A F01 | RIVAROXABAN | 60320 | RIVAROXABAN |

Table S2:

Operational definitions for subpopulations:

| Non-valvular Atrial Fibrillation (NVAF) | Patients with a record of Atrial fibrillation (AF) any time prior index date or within the 2 weeks after the index date, and free of valvular replacement or mitral stenosis (see table codes below) prior to index date or 2 weeks after index-date |
|---|--|
| Renal Impairment | We will obtain eGFR values from creatinine values using the MDMR (1) or CDK-EPI (2) formula. Furthermore we will define four levels of decreasing severity of severe renal impairment (defined as eGFR < 30 ml/min/1.73m³) or READ code indicating renal dialysis or kidney transplant moderate renal impairment (defined as eGFR 30–44 ml/min/1.73m² mild renal disease (45–59 ml/min/1.73m² |

(1)Modification of Diet in Renal Disease equation (MDMR) formula to calculated the eGFR, expressed in ml per minute

 $eGFR = 186 \ x \ (Creat / 88.4)^{-1.154} \ x \ (Age)^{-0.203} \ x \ (0.742 \ if female)$ (2)CDK-EPI Formula: $eGFR = 141 \ * \min(Scr/\kappa, 1)a \ * \max(Scr/\kappa, 1) - 1.209 \ * 0.993Age \ * 1.018 \ [if female] \ * 1.159 \ [if black]$



Scr: serum creatinine (mg/dL) κ : 0.7 for females and 0.9 for males α : 0.329 for females and 0.411 for males min : the minimum of Scr/ κ or 1 max : the maximum of Scr/ κ or 1.

Table S3- AF READ codes

| READ | Description |
|---------|--|
| 3272.00 | ECG: ATRIAL FIBRILLATION |
| 3273.00 | ECG: ATRIAL FLUTTER |
| 3274.00 | ECG: PAROXYSMAL ATRIAL TACHY. |
| 7936A00 | IMPLANT INTRAVENOUS PACEMAKER FOR ATRIAL FIBRILLATION |
| G570.00 | PAROXYSMAL SUPRAVENTRICULAR TACHYCARDIA |
| G570000 | PAROXYSMAL ATRIAL TACHYCARDIA |
| G573.00 | ATRIAL FIBRILLATION AND FLUTTER |
| G573000 | ATRIAL FIBRILLATION |
| G573100 | ATRIAL FLUTTER |
| G573200 | PAROXYSMAL ATRIAL FIBRILLATION |
| G573z00 | ATRIAL FIBRILLATION AND FLUTTER NOS |
| 14AN.00 | H/O: ATRIAL FIBRILLATION |
| 212R.00 | Atrial fibrillation resolved |
| 662S.00 | Atrial fibrillation monitoring |
| 6A900 | Atrial fibrillation annual review |
| 9hF00 | Exception reporting: atrial fibrillation quality indicators |
| 9hF1.00 | Excepted from atrial fibrillation qual indic: Inform dissent |
| 9Os00 | Atrial fibrillation monitoring administration |
| 9Os0.00 | Atrial fibrillation monitoring first letter |
| 9Os1.00 | Atrial fibrillation monitoring second letter |
| 9Os2.00 | Atrial fibrillation monitoring third letter |
| 9Os3.00 | Atrial fibrillation monitoring verbal invite |
| 9Os4.00 | Atrial fibrillation monitoring telephone invite |
| G573300 | Non-rheumatic atrial fibrillation |

| Table s4 READ | Codes for mitral | stenosis (to | exclude from AF | patients) |
|----------------------|------------------|---------------|-----------------|-----------|
|----------------------|------------------|---------------|-----------------|-----------|

| READ | Description |
|---------|------------------------------------|
| G1111 | Rheumatic mitral valve disease |
| G110.00 | Mitral stenosis |
| G110.11 | Rheumatic mitral stenosis |
| G112.00 | Mitral stenosis with insufficiency |
| G112.12 | Mitral stenosis with incompetence |



| G112.13 | Mitral stenosis with regurgitation |
|---------|--|
| G113.00 | Nonrheumatic mitral valve stenosis |
| G130.00 | Mitral and aortic stenosis |
| G131.00 | Mitral stenosis and aortic insufficiency |
| G131.13 | Mitral stenosis and aortic incompetence |
| G131.14 | Mitral stenosis and aortic regurgitation |
| P6500 | Congenital mitral stenosis |
| P650.00 | Congenital mitral stenosis, unspecified |
| P651.00 | Fused commissure of the mitral valve |
| P65z.00 | Congenital mitral stenosis NOS |
| РбууС00 | Fusion of mitral valve cusps |

Table S5 READ Codes for valvular replacement- to exclude from AF patients)

| READ | Description |
|---------|---|
| 7910.12 | Replacement of mitral valve |
| 7910000 | Allograft replacement of mitral valve |
| 7910100 | Xenograft replacement of mitral valve |
| 7910200 | Prosthetic replacement of mitral valve |
| 7910211 | Bjork-Shiley prosthetic replacement of mitral valve |
| 7910212 | Bjork-Shiley prosthetic replacement of mitral valve |
| 7910213 | Carpentier prosthetic replacement of mitral valve |
| 7910214 | Edwards prosthetic replacement of mitral valve |
| 7910300 | Replacement of mitral valve NEC |
| 7911.12 | Replacement of aortic valve |
| 7911000 | Allograft replacement of aortic valve |
| 7911100 | Xenograft replacement of aortic valve |
| 7911200 | Prosthetic replacement of aortic valve |
| 7911300 | Replacement of aortic valve NEC |
| 7911500 | Transapical aortic valve implantation |
| 7911600 | Transluminal aortic valve implantation |
| 7912.11 | Replacement of tricuspid valve |
| 7912000 | Allograft replacement of tricuspid valve |
| 7912100 | Xenograft replacement of tricuspid valve |
| 7912200 | Prosthetic replacement of tricuspid valve |
| 7912300 | Replacement of tricuspid valve NEC |
| 7913.12 | Replacement of pulmonary valve |
| 7913000 | Allograft replacement of pulmonary valve |
| 7913100 | Xenograft replacement of pulmonary valve |



| 7913200 | Prosthetic replacement of pulmonary valve |
|---------|--|
| 7913300 | Replacement of pulmonary valve NEC |
| 7914.11 | Replacement of unspecified valve of heart |
| 7914000 | Allograft replacement of valve of heart NEC |
| 7914100 | Xenograft replacement of valve of heart NEC |
| 7914200 | Prosthetic replacement of valve of heart NEC |
| 7914211 | Edwards prosthetic replacement of valve of heart |
| 7914212 | Starr prosthetic replacement of valve of heart |
| 7914300 | Replacement of valve of heart NEC |
| 7914600 | Replacement of truncal valve |
| 7919600 | Percutaneous transluminal pulmonary valve replacement |
| 791C000 | Aortic root replac us pul val auto ri vent pulm art val cond |
| 791C100 | Ao ro repl us pulm val auto ri vent pul art val cond aortov |
| 791C200 | Aortic root replacement using homograft |
| 791C300 | Aortic root replacement using mechanical prosthesis |
| 791C400 | Aortic root replacement |
| 14S4.00 | H/O: heart valve recipient |
| 14T3.00 | H/O: artificial heart valve |
| SP00200 | Mechanical complication of heart valve prosthesis |
| SP00400 | Infect and inflammatory reaction due to cardiac valve pros |
| SyuK611 | [X] Embolism from prosthetic heart valve |
| TB01200 | Implant of heart valve prosthesis + complication, no blame |
| ZV42200 | [V]Heart valve transplanted |
| ZV43300 | [V]Has artificial heart valve |
| ZV45H00 | [V]Presence of prosthetic heart valve |
| ZVu6e00 | [X]Presence of other heart valve replacement |

Table S6. Read codes of Dialysis (renal Impairment)

| Read | Description |
|---------|--|
| 14V2.00 | H/O: renal dialysis |
| 14V2.11 | H/O: kidney dialysis |
| 4I29.00 | Peritoneal dialysis sample |
| 4N300 | Peritoneal dialysis fluid cell count |
| 4N400 | Dialysis fluid potassium level |
| 4N500 | Dialysis fluid sodium level |
| 7A60600 | Creation of graft fistula for dialysis |
| 7A61900 | Ligation of arteriovenous dialysis fistula |
| 7A61A00 | Ligation of arteriovenous dialysis graft |
| 7L1A.11 | Dialysis for renal failure |



| 7L1A000 | Renal dialysis |
|---------|--|
| 7L1A011 | Thomas intravascular shunt for dialysis |
| 7L1A100 | Peritoneal dialysis |
| 7L1A200 | Haemodialysis NEC |
| 7L1A400 | Automated peritoneal dialysis |
| 7L1A500 | Continuous ambulatory peritoneal dialysis |
| 7L1A600 | Peritoneal dialysis NEC |
| 7L1B.11 | Placement ambulatory dialysis apparatus - compens renal fail |
| 7L1B000 | Insertion of ambulatory peritoneal dialysis catheter |
| 7L1B100 | Removal of ambulatory peritoneal dialysis catheter |
| 7L1B200 | Flushing of peritoneal dialysis catheter |
| 7L1C000 | Insertion of temporary peritoneal dialysis catheter |
| 7L1f000 | Extracorporeal albumin haemodialysis |
| 8882.00 | Intestinal dialysis |
| SP05613 | [X] Peritoneal dialysis associated peritonitis |
| SP06B00 | Continuous ambulatory peritoneal dialysis associated perit |
| TA02.00 | Accid cut,puncture,perf,h'ge - kidney dialysis/oth perfusion |
| TA02000 | Accid cut,puncture,perf,h'ge - kidney dialysis |
| TA02011 | Accidental cut/puncture/perf/haem'ge during renal dialysis |
| TA12000 | Foreign object left in body during kidney dialysis |
| TA12011 | Foreign object left in body during renal dialysis |
| TA22000 | Failure of sterile precautions during kidney dialysis |
| TA22011 | Failure of sterile precautions during renal dialysis |
| TA42000 | Mechanical failure of apparatus during kidney dialysis |
| TA42011 | Mechanical failure of apparatus during renal dialysis |
| TB11.00 | Kidney dialysis with complication, without blame |
| TB11.11 | Renal dialysis with complication, without blame |
| U611200 | [X]Foreign obj accid left body dur kidney dialys/oth perfus |
| U612200 | [X]Failure sterile precautions dur kidney dialys/other perf |
| U641.00 | [X]Kidny dialysis caus abn reac pt/lat comp no misad at time |
| Z131500 | Warming patient with warm haemodialysis |
| Z131600 | Warming patient with warm peritoneal dialysis |
| Z1A2.00 | Haemodialysis training |
| Z1A2.11 | HD - Haemodialysis training |
| Z919.00 | Care of haemodialysis equipment |
| Z919100 | Priming haemodialysis lines |
| Z919200 | Washing back through haemodialysis lines |
| Z919300 | Reversing haemodialysis lines |
| Z91A.00 | Peritoneal dialysis bag procedure |
| Z91A100 | Putting additive into peritoneal dialysis bag |
| ZV45100 | [V]Renal dialysis status |



| ZV56.00 | [V]Aftercare involving intermittent dialysis |
|---------|--|
| ZV56000 | [V]Aftercare involving extracorporeal dialysis |
| ZV56011 | [V]Aftercare involving renal dialysis NOS |
| ZV56100 | [V]Preparatory care for dialysis |
| ZV56y00 | [V]Other specified aftercare involving intermittent dialysis |
| ZV56y11 | [V]Aftercare involving peritoneal dialysis |
| ZV56z00 | [V]Unspecified aftercare involving intermittent dialysis |
| 4N00 | Dialysis fluid examination |
| 4N000 | Dialysis fluid urea level |
| 4N100 | Dialysis fluid creatinine level |
| 4N200 | Dialysis fluid glucose level |
| SP01500 | Mechanical complication of dialysis catheter |
| Z131400 | Warming patient by dialysis therapy |
| Z132800 | Cooling patient using cool peritoneal dialysis |
| Z1A00 | Dialysis training |
| Z1A1.00 | Peritoneal dialysis training |
| Z1A1.11 | PD - Peritoneal dialysis training |
| Z919400 | Recirculation of the dialysis machine |
| ZVu3G00 | [X]Other dialysis |

Table S7. Read codes of Kidney transplant (renal Impairment)

| Read | Description |
|---------|--|
| 7B00.00 | Transplantation of kidney |
| 7B00000 | Autotransplant of kidney |
| 7B00100 | Transplantation of kidney from live donor |
| 7B00111 | Allotransplantation of kidney from live donor |
| 7B00200 | Transplantation of kidney from cadaver |
| 7B00211 | Allotransplantation of kidney from cadaver |
| 7B00300 | Allotransplantation of kidney from cadaver, heart-beating |
| 7B00400 | Allotransplantation kidney from cadaver, heart non-beating |
| 7B00500 | Allotransplantation of kidney from cadaver NEC |
| 7B00y00 | Other specified transplantation of kidney |
| 7B00z00 | Transplantation of kidney NOS |
| 7B01500 | Transplant nephrectomy |
| 7B01511 | Excision of rejected transplanted kidney |
| 7B06300 | Exploration of renal transplant |
| 7B0F.00 | Interventions associated with transplantation of kidney |
| 7B0F100 | Pre-transplantation of kidney work-up, recipient |
| 7B0F200 | Pre-transplantation of kidney work-up, live donor |
| 7B0F300 | Post-transplantation of kidney examination, recipient |
| 7B0F400 | Post-transplantation of kidney examination, live donor |



| 7B0Fy00 | OS interventions associated with transplantation of kidney |
|---------|---|
| 7B0Fz00 | Interventions associated with transplantation of kidney NOS |
| 8L50.00 | Renal transplant planned |
| SP08011 | 13.1.1.1.1.1 Det.ren.func.after ren.transpl |
| SP08300 | Kidney transplant failure and rejection |
| TB00100 | Kidney transplant with complication, without blame |
| ZV42000 | [V]Kidney transplanted |
| 14S2.00 | H/O: kidney recipient |

CKD stage 1

| U | |
|---------|---|
| 1Z10.00 | Chronic kidney disease stage 1 |
| 1Z17.00 | Chronic kidney disease stage 1 with proteinuria |
| 1Z17.11 | CKD stage 1 with proteinuria |
| 1Z18.00 | Chronic kidney disease stage 1 without |
| | proteinuria |

CKD Stage 2

| end blage | - |
|-----------|---|
| 1Z11.00 | Chronic kidney disease stage 2 |
| 1Z19.00 | Chronic kidney disease stage 2 with proteinuria |
| 1Z19.11 | CKD stage 2 with proteinuria |
| 1Z1A.00 | Chronic kidney disease stage 2 without |
| | proteinuria |
| 1Z1A.11 | CKD stage 2 without proteinuria |
| | |

CKD stage 3

| 0 | |
|---------|---|
| 1Z12.00 | Chronic kidney disease stage 3 |
| 1Z15.00 | Chronic kidney disease stage 3A |
| 1Z16.00 | Chronic kidney disease stage 3B |
| 1Z1B.00 | Chronic kidney disease stage 3 with proteinuria |
| 1Z1B.11 | CKD stage 3 with proteinuria |
| 1Z1C.00 | Chronic kidney disease stage 3 without proteinuria |
| 1Z1C.11 | CKD stage 3 without proteinuria |
| 1Z1D.00 | Chronic kidney disease stage 3A with proteinuria |
| 1Z1D.11 | CKD stage 3A with proteinuria |
| 1Z1E.00 | Chronic kidney disease stage 3A without proteinuria |
| 1Z1E.11 | CKD stage 3A without proteinuria |
| 1Z1F.00 | Chronic kidney disease stage 3B with proteinuria |
| 1Z1F.11 | CKD stage 3B with proteinuria |
| 1Z1G.00 | Chronic kidney disease stage 3B without proteinuria |



| 1 |
|---|
| |

CKD stage 4

| U | |
|---------|---|
| 1Z13.00 | Chronic kidney disease stage 4 |
| 1Z1H.00 | Chronic kidney disease stage 4 with proteinuria |
| 1Z1H.11 | CKD stage 4 with proteinuria |
| 1Z1J.00 | Chronic kidney disease stage 4 without |
| | proteinuria |
| 1Z1J.11 | CKD stage 4 without proteinuria |
| | |

Dialysis Stage 4

| 14V2.00 | H/O: renal dialysis |
|---------|--|
| 14V2.11 | H/O: kidney dialysis |
| 4129.00 | Peritoneal dialysis sample |
| 4N300 | Peritoneal dialysis fluid cell count |
| 4N400 | Dialysis fluid potassium level |
| 4N500 | Dialysis fluid sodium level |
| 7A60600 | Creation of graft fistula for dialysis |
| 7A61900 | Ligation of arteriovenous dialysis fistula |
| 7A61A00 | Ligation of arteriovenous dialysis graft |
| 7L1A.11 | Dialysis for renal failure |
| 7L1A000 | Renal dialysis |
| 7L1A011 | Thomas intravascular shunt for dialysis |
| 7L1A100 | Peritoneal dialysis |
| 7L1A200 | Haemodialysis NEC |
| 7L1A400 | Automated peritoneal dialysis |
| 7L1A500 | Continuous ambulatory peritoneal dialysis |
| 7L1A600 | Peritoneal dialysis NEC |
| 7L1B.11 | Placement ambulatory dialysis apparatus - compens renal fail |
| 7L1B000 | Insertion of ambulatory peritoneal dialysis catheter |
| 7L1B100 | Removal of ambulatory peritoneal dialysis catheter |
| 7L1B200 | Flushing of peritoneal dialysis catheter |
| 7L1C000 | Insertion of temporary peritoneal dialysis catheter |
| 7L1f000 | Extracorporeal albumin haemodialysis |
| 8882.00 | Intestinal dialysis |
| SP05613 | [X] Peritoneal dialysis associated peritonitis |
| SP06B00 | Continuous ambulatory peritoneal dialysis associated perit |
| TA02.00 | Accid cut,puncture,perf,h'ge - kidney dialysis/oth perfusion |
| TA02000 | Accid cut,puncture,perf,h'ge - kidney dialysis |
| TA02011 | Accidental cut/puncture/perf/haem'ge during renal dialysis |



| TA12000 | Foreign object left in body during kidney dialysis |
|---------|--|
| TA12011 | Foreign object left in body during renal dialysis |
| TA22000 | Failure of sterile precautions during kidney dialysis |
| TA22011 | Failure of sterile precautions during renal dialysis |
| TA42000 | Mechanical failure of apparatus during kidney dialysis |
| TA42011 | Mechanical failure of apparatus during renal dialysis |
| TB11.00 | Kidney dialysis with complication, without blame |
| TB11.11 | Renal dialysis with complication, without blame |
| U611200 | [X]Foreign obj accid left body dur kidney dialys/oth perfus |
| U612200 | [X]Failure sterile precautions dur kidney dialys/other perf |
| U641.00 | [X]Kidny dialysis caus abn reac pt/lat comp no misad at time |
| Z131500 | Warming patient with warm haemodialysis |
| Z131600 | Warming patient with warm peritoneal dialysis |
| Z1A2.00 | Haemodialysis training |
| Z1A2.11 | HD - Haemodialysis training |
| Z919.00 | Care of haemodialysis equipment |
| Z919100 | Priming haemodialysis lines |
| Z919200 | Washing back through haemodialysis lines |
| Z919300 | Reversing haemodialysis lines |
| Z91A.00 | Peritoneal dialysis bag procedure |
| Z91A100 | Putting additive into peritoneal dialysis bag |
| ZV45100 | [V]Renal dialysis status |
| ZV56.00 | [V]Aftercare involving intermittent dialysis |
| ZV56000 | [V]Aftercare involving extracorporeal dialysis |
| ZV56011 | [V]Aftercare involving renal dialysis NOS |
| ZV56100 | [V]Preparatory care for dialysis |
| ZV56y00 | [V]Other specified aftercare involving intermittent dialysis |
| ZV56y11 | [V]Aftercare involving peritoneal dialysis |
| ZV56z00 | [V]Unspecified aftercare involving intermittent dialysis |
| 4N00 | Dialysis fluid examination |
| 4N000 | Dialysis fluid urea level |
| 4N100 | Dialysis fluid creatinine level |
| 4N200 | Dialysis fluid glucose level |
| SP01500 | Mechanical complication of dialysis catheter |
| Z131400 | Warming patient by dialysis therapy |
| Z132800 | Cooling patient using cool peritoneal dialysis |
| Z1A00 | Dialysis training |
| Z1A1.00 | Peritoneal dialysis training |
| Z1A1.11 | PD - Peritoneal dialysis training |



| Z919400 | Recirculation of the dialysis machine |
|---------|---|
| 7B00.00 | Transplantation of kidney |
| 7B00000 | Autotransplant of kidney |
| 7B00100 | Transplantation of kidney from live donor |
| 7B00111 | Allotransplantation of kidney from live donor |
| 7B00200 | Transplantation of kidney from cadaver |
| 7B00211 | Allotransplantation of kidney from cadaver |
| 7B00300 | Allotransplantation of kidney from cadaver, heart-beating |
| 7B00400 | Allotransplantation kidney from cadaver, heart non-beating |
| 7B00500 | Allotransplantation of kidney from cadaver NEC |
| 7B00y00 | Other specified transplantation of kidney |
| 7B00z00 | Transplantation of kidney NOS |
| 7B01500 | Transplant nephrectomy |
| 7B01511 | Excision of rejected transplanted kidney |
| 7B06300 | Exploration of renal transplant |
| 7B0F.00 | Interventions associated with transplantation of kidney |
| 7B0F100 | Pre-transplantation of kidney work-up, recipient |
| 7B0F200 | Pre-transplantation of kidney work-up, live donor |
| 7B0F300 | Post-transplantation of kidney examination, recipient |
| 7B0F400 | Post-transplantation of kidney examination, live donor |
| 7B0Fy00 | OS interventions associated with transplantation of kidney |
| 7B0Fz00 | Interventions associated with transplantation of kidney NOS |
| 8L50.00 | Renal transplant planned |
| SP08011 | Det.ren.func.after ren.transpl |
| SP08300 | Kidney transplant failure and rejection |
| TB00100 | Kidney transplant with complication, without blame |
| ZV42000 | [V]Kidney transplanted |
| 14S2.00 | H/O: kidney recipient |



Annex 4. Signature pages

Signature Page - Study Conduct Responsible and Study Epidemiologist

| Title | Pattern of use of Direct Oral Anticoagulants in Non-valvular Atrial Fibrillation patients in UK general practices | |
|--------------------------------------|--|----------|
| Protocol version identifier | 1.0 | |
| Date of last version of protocol | 24.02.2017 | |
| IMPACT study number | 19330 | |
| Study type | ⊠ PASS | non PASS |
| EU PAS register number | Study not yet registered | |
| Active substance (medicinal product) | B01A F DIRECT FACTOR Xa INHIBITORS (B01A F01 RIVAROXABAN, B01A F02 APIXABAN) and B01A E07 DABIGATRAN | |
| Marketing authorization holder(s) | Bayer AG, 51368 Leverkusen | |
| Function | Epidemiology | |
| Name | Gunnar Brobert | |

The undersigned confirms that the study will be conducted in compliance with the protocol and any applicable regulatory requirements.



Signature Page - Study Medical Expert

| Title | Pattern of use of Direct Oral Anticoagulants in Non-valvular Atrial Fibrillation patients in UK general practices | |
|--------------------------------------|--|----------|
| Protocol version identifier | 1.0 | |
| Date of last version of protocol | 24.02.2017 | |
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| Study type | ⊠ PASS | non PASS |
| EU PAS register number | Study not yet registered | |
| Active substance (medicinal product) | B01A F DIRECT FACTOR Xa INHIBITORS (B01A F01 RIVAROXABAN, B01A F02 APIXABAN) and B01A E07 DABIGATRAN | |
| Marketing authorization holder(s) | Bayer AG, 51368 Leverkusen | |
| Function | Global Medical Affairs Thrombosis | |
| Name | Isabelle Ling Meng | |

The undersigned confirms that the study will be conducted in compliance with the protocol and any applicable regulatory requirements.



Signature Page - Study Safety Lead

| Title | Pattern of use of Direct Oral Anticoagulants in Non-valvular Atrial Fibrillation patients in UK general practices | |
|--------------------------------------|--|----------|
| Protocol version identifier | 1.0 | |
| Date of last version of protocol | 24.02.2017 | |
| IMPACT study number | 19330 | |
| Study type | \boxtimes PASS | non PASS |
| EU PAS register number | Study not yet registered | |
| Active substance (medicinal product) | B01A F DIRECT FACTOR Xa INHIBITORS (B01A F01 RIVAROXABAN, B01A F02 APIXABAN) and B01A E07 DABIGATRAN | |
| Marketing authorization holder(s) | Bayer AG, 51368 Leverkusen | |
| Function | Pharmacovigilance | |
| Name | Tomasz Dyszynski | |

The undersigned confirms that the study will be conducted in compliance with the protocol and any applicable regulatory requirements.



Signature Page - Study Statistician

| Title | Pattern of use of Direct Oral Anticoagulants in Non-valvular Atrial Fibrillation patients in UK general practices | |
|--------------------------------------|--|----------|
| Protocol version identifier | 1.0 | |
| Date of last version of protocol | 24.02.2017 | |
| IMPACT study number | 19330 | |
| Study type | ⊠ PASS | non PASS |
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| Active substance (medicinal product) | B01A F DIRECT FACTOR Xa INHIBITORS (B01A F01 RIVAROXABAN, B01A F02 APIXABAN) and B01A E07 DABIGATRAN | |
| Marketing authorization holder(s) | Bayer AG, 51368 Leverkusen | |
| Function | Statistics | |
| Name | Martin Homering | |

The undersigned confirms that the study will be conducted in compliance with the protocol and any applicable regulatory requirements.



Signature Page - Study Health Economist

| Title | Pattern of use of Direct Oral Anticoagulants in Non-valvular Atrial Fibrillation patients in UK general practices | |
|--------------------------------------|--|----------|
| Protocol version identifier | 1.0 | |
| Date of last version of protocol | 24.02.2017 | |
| IMPACT study number | 19330 | |
| Study type | ⊠ PASS | non PASS |
| EU PAS register number | Study not yet registered | |
| Active substance (medicinal product) | B01A F DIRECT FACTOR Xa INHIBITORS (B01A F01 RIVAROXABAN, B01A F02 APIXABAN) and B01A E07 DABIGATRAN | |
| Marketing authorization holder(s) | Bayer AG, 51368 Leve | rkusen |
| Function | Patient Access | |
| Name | Kevin Bowrin | |

The undersigned confirms that the study will be conducted in compliance with the protocol and any applicable regulatory requirements.



Signature Page - Real Life Evidence Strategy and Outcomes Data Generation

| Title | Pattern of use of Direct Oral Anticoagulants in Non-valvular Atrial Fibrillation patients in UK general practices | |
|--------------------------------------|--|----------|
| Protocol version identifier | 1.0 | |
| Date of last version of protocol | 24.02.2017 | |
| IMPACT study number | 19330 | |
| Study type | ⊠ PASS | non PASS |
| EU PAS register number | Study not yet registered | |
| Active substance (medicinal product) | B01A F DIRECT FACTOR Xa INHIBITORS (B01A F01 RIVAROXABAN, B01A F02 APIXABAN) and B01A E07 DABIGATRAN | |
| Marketing authorization holder(s) | Bayer AG, 51368 Leverkusen | |
| Function | Real Life Evidence Strategy and Outcomes Data Generation | |
| Name | Daniel Eriksson | |

The undersigned confirms that the study will be conducted in compliance with the protocol and any applicable regulatory requirements.



Signature Page - Local Study Unit - Medical Affairs (Bayer UK)

| Title | Pattern of use of Direct Oral Anticoagulants in Non-valvular Atrial Fibrillation patients in UK general practices | |
|--------------------------------------|--|----------|
| Protocol version identifier | 1.0 | |
| Date of last version of protocol | 24.02.2017 | |
| IMPACT study number | 19330 | |
| Study type | ⊠ PASS | non PASS |
| EU PAS register number | Study not yet registered | |
| Active substance (medicinal product) | B01A F DIRECT FACTOR Xa INHIBITORS (B01A F01 RIVAROXABAN, B01A F02 APIXABAN) and B01A E07 DABIGATRAN | |
| Marketing authorization holder(s) | Bayer AG, 51368 Leverkusen | |
| Function | Local Study Unit - Medical Affairs (Bayer UK) | |
| Name | Samuel Fatoba | |

The undersigned confirms that the study will be conducted in compliance with the protocol and any applicable regulatory requirements.



Signature Page – Medical Advisor (Bayer UK)

| Title | Pattern of use of Direct Oral Anticoagulants in Non-valvular Atrial Fibrillation patients in UK general practices | |
|--------------------------------------|--|----------|
| Protocol version identifier | 1.0 | |
| Date of last version of protocol | 24.02.2017 | |
| IMPACT study number | 19330 | |
| Study type | ⊠ PASS | non PASS |
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| Active substance (medicinal product) | B01A F DIRECT FACTOR Xa INHIBITORS (B01A F01 RIVAROXABAN, B01A F02 APIXABAN) and B01A E07 DABIGATRAN | |
| Marketing authorization holder(s) | Bayer AG, 51368 Leverkusen | |
| Function | Medical Advisor (Bayer UK) | |
| Name | Luke Roberts | |

The undersigned confirms that the study will be conducted in compliance with the protocol and any applicable regulatory requirements.



Signature Page – Principal Investigator

| Title | Pattern of use of Direct Oral Anticoagulants in Non-valvular Atrial Fibrillation patients in UK general practices | |
|--------------------------------------|--|----------|
| Protocol version identifier | 1.0 | |
| Date of last version of protocol | 24.02.2017 | |
| IMPACT study number | 19330 | |
| Study type | ⊠ PASS | non PASS |
| EU PAS register number | Study not yet registered | |
| Active substance (medicinal product) | B01A F DIRECT FACTOR Xa INHIBITORS (B01A F01 RIVAROXABAN, B01A F02 APIXABAN) and B01A E07 DABIGATRAN | |
| Marketing authorization holder(s) | Bayer AG, 51368 Leverkusen | |
| | | |
| Function | Principal Investigator | |
| Name | Dr Luis A Garcia Rodriguez | |
| | Spanish Centre for Pharmacoepidemiologic Research (CEIFE), Almirante, 28, 2, 28004 Madrid, Spain | |

The undersigned confirms that the study will be conducted in compliance with the protocol and any applicable regulatory requirements.



Signature Page – Co-investigator

| Title | Pattern of use of Direct Oral Anticoagulants in Non-valvular Atrial Fibrillation patients in UK general practices | |
|--------------------------------------|--|--|
| Protocol version identifier | 1.0 | |
| Date of last version of protocol | 24.02.2017 | |
| IMPACT study number | 19330 | |
| Study type | \square PASS \square non PASS | |
| EU PAS register number | Study not yet registered | |
| Active substance (medicinal product) | B01A F DIRECT FACTOR Xa INHIBITORS (B01A F01 RIVAROXABAN, B01A F02 APIXABAN) and B01A E07 DABIGATRAN | |
| Marketing authorization holder(s) | Bayer AG, 51368 Leverkusen | |
| | | |
| Function | Co-investigator | |
| Name | Ana Ruigomez | |
| | Spanish Centre for Pharmacoepidemiologic Research (CEIFE), Almirante, 28, 2, 28004 Madrid, Spain | |

The undersigned confirms that the study will be conducted in compliance with the protocol and any applicable regulatory requirements.