

# Methodological Note for HCP/ORDM/HCO Disclosure 2025

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Abcur AB (An entity of ADVANZ PHARMA) located in Sweden is committed to ensuring transparency of relationships with healthcare professionals (HCPs), healthcare organisations (HCOs) and patient organisations (POs), by operating within the “Läkemedelsindustriföreningen (Lif)” aligned with the European Federation of Pharmaceutical Industries and Associations (EFPIA) Code , International trade association IFPMA as well as of the Association of the European Self-Medication Industry (AESGP) on Disclosure of Transfers of Value.

The principles applied in this methodological note are relevant to Sweden only.

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## 1. Definitions

### 1.1 Recipients

The types of recipients who can receive transfers of value are:

- Healthcare Professional (HCP): A member of the medical, dental, pharmacy or nursing professions or any other person who, in the course of his/her professional activities, may prescribe, purchase, supply, recommend or administer a medicinal product and whose primary practice, principal professional address or place of incorporation is in Sweden.

Transfers of value to HCPs who are retired at the time of the activity or engagement with Abcur AB will also be disclosed in accordance with the above definition and applicable transparency requirements.

If an HCP is deceased subsequent to an engagement with Abcur AB, the transfer of value would be disclosed in the relevant disclosure year.

- Healthcare Organisation (HCO): A healthcare, medical or scientific association or organisation (e.g., a hospital, clinic, foundation, university or other teaching institution or learned society) whose business address, place of incorporation or primary place of operation is in Sweden; or an organisation through which one or more HCPs provide services.
- Patient organization (PO): An organisation mainly comprising of patients and/or caregivers or any user organisation such as a disability organisation, carer or relative organisation and consumer organisation that represents and/or supports the needs of patients and/or caregivers.

- **Research and Development (R&D):** HCP/HCO transfers of value that relate to the planning and conduct of:
  - Non-clinical studies (as defined in OECD Principles on Good Laboratory Practice);
  - Clinical trials (as defined in Directive 2001/20/EC);
  - Non-interventional studies that are prospective in nature and that involve the collection of patient data from or on behalf of individual, or groups of, HCPs specifically for the study. This also includes investigator sponsored research (ISRs).

## 1.2 Kind of ToVs

In 2025, Abcur AB has disclosed the following financial and non-financial payments:

	HCP	HCO	PO
<b><u>Contracted Services</u></b> ToVs resulting from or related to a contract where the HCP / HCO/ PO provides services  Examples: Advisory Boards, Speaker Services, Consulting Services, Steering Committees, Market Access/Market Research	√		
<b><u>Related Expenses to the Contracted Service</u></b> ToVs directly related to a fee for service contract  Examples: Travel (incl. flights, taxi, train, parking), Accommodation	√		
<b><u>Sponsorship Agreements</u></b> ToVs made to either the HCO/PO directly or to an event organizer or other third party appointed by the HCO/PO to manage an educational or scientific event.  Examples: Congress Sponsorship, Stand/Booth Sponsorship		√	
<b><u>Support to Attend Third Party Led Educational Meetings</u></b>  Examples: Registration Fees, Travel and Accommodation			
<b><u>Donations**</u></b> Non-financial support provided for an unspecified purpose			
<b><u>Grants**</u></b> Funding provided to support a specific activity that provides educational benefit or enhances patient care			
<b><u>Research and Development</u></b> ToVs related to non-clinical studies, clinical studies and non- interventional studies  Examples: Investigator site fees, Advisory boards related to R&D Expert meeting services, Data safety monitoring boards, Steering Committee meetings, Investigator sponsored research		√	
<b><u>Benefits in Kind</u></b>  Examples: AVEP, Provision of free passes to educational events			

\* Market access and market research costs where the identify of the individual is known to Abcur AB, where these activities are “blind” or unknown to Abcur AB, these disclosures are not made.

\*\* Donations and grants for medical educational projects. Abcur AB funding policies in these circumstances require that Abcur AB has no influence over the details of the project. As Abcur AB would not influence or select HCPs involved in such projects, Abcur AB would disclose such payments under an HCO category where such definition is met by the independent company. Where Abcur AB is requested by an HCO to provide a financial grant to assist its employees to attend third party medical meetings, where possible the payment will be disclosed against a named individual HCP. Where Abcur AB is not aware of the identity of recipient HCPs, the grant is declared against the named healthcare organisation.

## 2. Disclosure's Scope

### 2.1 Products concerned

Prescription only Medicines within the context of the activities listed in section 1.2.

### 2.2 Company concerned

Disclosure is made under Abcur AB, an entity of ADVANZ PHARMA

### 2.3 Excluded ToVs

The following categories were deemed out of scope for disclosure:

1. All costs associated with meetings run solely by Abcur AB except for fees paid to individual HCPs providing services as speakers, and HCP support for logistics to attend a meeting;
2. All costs related to OTC medicines and Medical Devices;
3. Costs related to subsistence (food) are not declared. Meals are excluded as per LIF thresholds and rules
4. All delivery of samples
5. All articles of medical utility and educational or informative materials to HCPs

### 2.4 ToVs date

The reporting period is by calendar year (1<sup>st</sup> January 2025 to 31<sup>st</sup> December 2025).

ToVs are reported based on payment date or transfer of value date (e.g. the date a flight was taken). Where an interaction with a Swedish HCP, HCO or PO runs for more than one year, Abcur AB will disclose ToVs made in the year of payment or transfer.

### 2.5 Direct ToVs

Activity types that may result in direct transfers of value:

- HCP/HCO/POs fee for service e.g.
  - participation at Abcur AB led meetings, such as advisory boards, speaker meetings, congress symposiums
  - market access activities
  - consultancy services such as training, advising, medical writing, data analysis
- HCP support such as travel, accommodation, registration fees related to a fee for service
- HCO/PO sponsorship of educational or scientific events
- HCO/PO donations
- HCO/PO grants

HCPs who have worked with Abcur AB may ask for their fee to be paid to charity. Abcur AB does not encourage this type of fee payment and all payments are made directly to the HCP.

## 2.6 Indirect ToVs

In some cases, a third party may be contracted to make indirect transfers of value to HCPs or HCOs. These may be:

- Third party event organisers, including secretariats acting on behalf of healthcare organisations
- Travel companies
- Logistics or Medical Communication Agencies

Indirect ToVs could include:

- Fees for service
- HCP support such as travel, accommodation or registration fees
- HCO sponsorships

In such cases, Abcur AB will disclose any payments made to the individual HCP or to the HCO by the service agency as if the payment had been made directly by Abcur AB to that HCP or HCO.

## 2.7 Non-monetary ToVs

Non-monetary ToVs are included under “benefits in kind” as described in section 1.2.

As reflected in the above table, no non-monetary ToV were identified for the reporting year 2025; therefore, this section is considered **not applicable**.

## 2.8 ToVs in case of partial attendances or cancellation and refund

ToVs will only be disclosed where the benefit has been received. In the event of a cancellation or where a Swedish HCP, HCO or PO does not receive the benefit due to non-participation, Abcur AB will not disclose ToVs against such HCP, HCO or PO.

Any Fee for Service activity where the HCP did not or partially delivered a service, will result in payment and ToV for any work done and not include any service that was not completed.

## 2.9 Cross-border activities

All disclosures are made in the country in which the HCP or HCO practice is located. Payments made to Swedish based HCPs or organisations by ADVANZ PHARMA overseas operations are disclosed within Sweden.

## 2.10 R&D

Research and Development (R&D): HCP/HCO transfers of value that relate to the planning and conduct of:

- Non-clinical studies (as defined in OECD Principles on Good Laboratory Practice);
- Clinical trials (as defined in Directive 2001/20/EC);
- Non-interventional studies that are prospective in nature and that involve the collection of patient data from or on behalf of individual, or groups of, HCPs specifically for the study. This also includes investigator sponsored research (ISRs).

## 2.11 Voluntary disclosure

Not applicable for Sweden

# 3. Specific considerations

## 3.1 Country unique identifier

Each vendor used by Abcur AB has a unique finance vendor identifier, which is used for internal purposes only. No commercial identifiers for HCPs or HCOs are published publicly.

### **3.2 Self-incorporated HCP**

If an HCP has set up a private company, as a sole director, they will be considered an HCP for disclosure purposes. Part-time employees or contractors of Abcur AB (including employees or contractors of Abcur AB appointed agencies and third-party vendors) who are not also an employee of an HCO would fall outside the scope of disclosure for ToVs made by Abcur AB. For example, if an employee or contractor is providing full time services to ADVANZ PHARMA/Abcur AB (or to Abcur AB appointed agencies or third-party vendors) and they are not also employed by an HCO then this would not be considered as reportable.

### **3.3 Multi-year agreements**

Where projects run for several years Abcur AB will declare the amount paid relevant to the year in which each part of the payment was made. Thus a project which spans 4 calendar years and includes several individual transfers of value during that time will have four associated disclosures; one for each calendar year showing the value of the transfer made in that specific calendar year.

ToVs are reported based on payment date or transfer of value date (e.g. the date a flight was taken). Where an interaction with a Swedish HCP, HCO or PO runs for more than one year, Abcur AB will disclose ToVs made in the year of payment or transfer.

### **3.4 Country specificities**

#### **Co-Marketing Projects**

Where Abcur AB jointly markets a product with another pharmaceutical company, Abcur AB will only declare those payments made directly from Abcur AB bank accounts and listed in the company records as part of its normal business operations. Transfers of value made by its co-marketing partners will be disclosed separately by those organisations.

### **3.5 Quality Checks**

The disclosure report is developed by the global healthcare compliance team, reviewed by the activity initiators at affiliate level and verified by the Local Healthcare Compliance Responsible Person.

## **4.0 Data protection legal basis**

### **4.1 Consent collection**

Abcur obtains consent from HCPs in the HCP engagement agreements to disclose personal data related to individual transfers of value and publishes individualized data accordingly. Where permission has not been obtained or where HCPs have refused consent, Abcur may declare an aggregate figure given on a separate line entry within the relevant disclosure category and the % of non-consenting HCPs given as a percentage of the total HCPs receiving a ToV. HCPs have the right to withdraw consent at any time. If Abcur receives such a withdrawal of consent, Abcur will, within a reasonable period, move the relevant ToV data into the aggregate category.

HCO and PO consent is not required in order to disclose ToVs against named organisations in Sweden.

Research and development will be disclosed in aggregate for all Sweden transfers of value.

Partial disclosures: In 2025 there were 0 number of individuals who agreed to some payments being disclosed individually and some in aggregate.

### **4.2 Legitimate interests**

Not applicable. Abcur AB relies on consent as the legal basis for disclosure of individual HCP data in Sweden.

## 5. Form of disclosure

### 5.1 Date of publication

Transfers of value in 2025 will be published by 30 June 2026 at the latest.

### 5.2 Disclosure platform

All transfers of value to Swedish-based HCPs and HCOs, including research-related transfers, are disclosed via the LIF disclosure platform (<https://www.lif.se/>) in accordance with the LIF Code of Ethical Rules (LER).

Additionally, the transfers of value above are also disclosed on the ADVANZ PHARMA website, on the Ethics and Transparency page <https://www.advanzpharma.com/ethics-and-transparency>.

All transfers of value to Swedish-based patient organisations (POs) are disclosed on the ADVANZ PHARMA website (<https://www.advanzpharma.com/ethics-and-transparency>), in accordance with applicable transparency requirements. PO disclosures follow the EFPIA PO Code and are not reported via the LIF platform.

The disclosure of transfers of value to a PO must include both the monetary value and a description of that support to enable the reader to understand the nature of that support or the arrangements.

### 5.3 Disclosure language

English

## 6. Disclosure financial data

### 6.1 Currency

Abcur AB discloses ToVs in Swedish Krona (SEK). Where ToVs are made in another currency, the invoice amount will be converted into Swedish Krona using a monthly exchange rate. Amounts disclosed may therefore vary slightly from the exact amounts paid.

### 6.2 VAT included or excluded

For all ToVs, VAT and other applicable taxes and business-related fees (e.g. administration fees) are excluded where these can be identified.

### 6.3 Calculation rules

N/A

## 7. Additional Information

Abcur AB will maintain public disclosures for a minimum of three (3) years and will retain records for at least five (5) years after the end of the calendar year to which they relate.