

# Methodological Note for HCP/ORDM/HCO Disclosure 2025

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## Introduction

ADVANZ PHARMA is committed to ensuring transparency of relationships with healthcare professionals (HCPs), healthcare organisations (HCOs) and patient organisations (POs) by operating within Farmaindustria (Asociación Nacional Empresarial de la Industria Farmacéutica), aligned with the European Federation of Pharmaceutical Industries and Associations (EFPIA) Code on Disclosure on Transfers of Value.

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

## Contents

1. Definitions.....	2
1.1 Recipients.....	2
1.2 Kind of ToVs .....	3
2. Disclosure's Scope.....	3
2.1 Products concerned.....	3
2.2 Company concerned.....	3
2.3 Excluded ToVs.....	4
2.4 ToVs date.....	4
2.5 Direct ToVs .....	4
2.6 Indirect ToVs.....	4
2.7 Non-monetary ToVs .....	5
2.8 ToVs in case of partial attendances or cancellation and refund .....	5
2.9 Cross-border activities.....	5
2.10 R&D .....	5
2.11 Voluntary disclosure.....	5
3. Specific considerations .....	5
3.1 Country unique identifier .....	5
3.2 Self-incorporated HCP .....	5
3.3 Multi-year agreements.....	5
3.4 Country specificities .....	6
3.5 Quality Checks .....	6

4. Data protection legal basis .....	6
4.1 Consent collection .....	6
4.2 Legitimate interests.....	6
5. Form of disclosure .....	6
5.1 Date of publication .....	6
5.2 Disclosure platform .....	6
5.3 Disclosure language.....	7
6. Disclosure financial data .....	7
6.1 Currency .....	7
6.2 VAT included or excluded.....	7
6.3 Calculation rules .....	7
7. Additional Information .....	7

## 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 Spain. This includes employees of ADVANZ PHARMA whose primary occupation is that of a practicing health professional.

Transfers of value for HCPs who are retired at the time of the activity/engagement with ADVANZ PHARMA will be disclosed in the same way as they would be completely active. No different treatment will be allocated to retired than to active HCPs regarding the ToV perspective.

If an HCP is deceased subsequent to an engagement with ADVANZ PHARMA, the transfer of value would be disclosed in the relevant disclosure year. Any requests to remove ToV from the public domain would be dealt with on a case by case basis.

- **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 Spain; 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, ADVANZ PHARMA Spain has disclosed the following financial and non-financial payments:

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

## 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 ADVANZ PHARMA Spain S.L.

### 2.3 Excluded ToVs

The following categories were deemed out of scope for disclosure:

1. All costs associated with meetings run solely by ADVANZ PHARMA 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 but the meal costs are regulated by strict industry guidelines;
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 Spanish HCP, HCO or PO runs for more than one year, ADVANZ PHARMA 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 ADVANZ PHARMA 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
  - reimbursement for HCP support to attend an educational meeting
- HCO/PO sponsorship of educational or scientific events
- HCO/PO donations
- HCO/PO grants

HCPs who have worked with ADVANZ PHARMA may ask for their fee to be paid to charity. ADVANZ PHARMA 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, ADVANZ PHARMA 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 ADVANZ PHARMA to that HCP or HCO.

### **2.7 Non-monetary ToVs**

Please refer to the table in section 1.2 to see any applicable non-monetary ToVs.

### **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 an HCP, HCO or PO does not receive the benefit due to non-participation, ADVANZ PHARMA 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 Spanish-based HCP or organisations by ADVANZ PHARMA overseas operations are disclosed within Spain.

### **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**

No

## **3. Specific considerations**

### **3.1 Country unique identifier**

To publish the ToV disclosure information, ADVANZ PHARMA are required to include the HCP's coded ID number and the tax ID number for HCOs in a coded format. Example: XXX8827XX

In addition, each vendor used by ADVANZ PHARMA has a unique finance vendor identifier, which is used for internal purposes only.

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

If an HCP has set up a private company, they will be considered an HCP for disclosure purposes. Part-time employees or contractors of ADVANZ PHARMA (including employees or contractors of ADVANZ PHARMA'S 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 ADVANZ PHARMA. For example, if an employee or contractor is providing full time services to ADVANZ PHARMA (or to ADVANZ PHARMA'S 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 ADVANZ PHARMA 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 Spanish HCP, HCO or PO runs for more than one year, ADVANZ PHARMA will disclose ToVs made in the year of payment or transfer.

### **3.4 Country specificities**

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

Where ADVANZ PHARMA jointly markets a product with another pharmaceutical company, ADVANZ PHARMA will only declare those payments made directly from ADVANZ PHARMA 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 then verified, signed off and submitted by the Spanish Medical Director.

## **4.0 Data protection legal basis**

### **4.1 Consent collection**

In the case of HCPs, in accordance with Article 7f) of Directive 95/46, on the protection of individuals with regard to the processing of personal data and the free movement of such data, there is a legitimate interest of the companies subject to the Code, recognized by the AEPD in its Report dated April 22, 2016, so that consent is not necessary for the publication on an individual basis of the Transfers of Value to HCPs. In any case, ADVANZ PHARMA shall inform HCPs, pursuant to Organic Law 3/2018 of December 5, 2018, on the Protection of Personal Data and Guarantee of Digital Rights, that their data will be published in accordance with the provisions of Farmaindustria Code of Practice.

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

R&D ToVs are disclosed in aggregate for all transfers of values.

Spanish HCPs have the right to withdraw consent. If ADVANZ PHARMA receives such a withdrawal of consent an approved reason is required. This is then evaluated and reviewed in balance of the legal process of Legitimate Interest. If agreed, ADVANZ PHARMA will, within a reasonable period, move the relevant ToV data into the aggregate category.

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**

See section 4.1 above

## **5. Form of disclosure**

### **5.1 Date of publication**

Transfers of value in 2025 will be published on 30/06/26.

### **5.2 Disclosure platform**

All transfers of value to Spanish based HCPs, HCOs, POs and research related spend are disclosed on ADVANZ PHARMA's Website on the Ethics and Transparency page: (<https://www.advanzpharma.com/ethics-and-transparency>).

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**

Spanish

## **6. Disclosure financial data**

### **6.1 Currency**

ADVANZ PHARMA discloses ToVs in EUROS (€). Where ToVs are made in another currency, the invoice amount will be converted into EUROS (€) 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**

AVEP donations are disclosed at fair market value. Any free registration passes that may be given to HCPs as part of a sponsorship package are disclosed against the individual HCP, but at zero cost.

## **7. Additional Information**

ADVANZ PHARMA 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.