

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), patient organisations (POs), other relevant decision makers (ORDMs) and other disclosable parties (ODPs) by operating within the Association of British Pharmaceutical Industry (ABPI) Code of Practice for the Pharmaceutical Industry with the European Federation of Pharmaceutical Industries and Associations (EFPIA) Code on Disclosure on Transfers of Value.

For simplicity, ADVANZ PHARMA has maintained all of their required UK disclosures for ToV from each of their legal entities on a single portal named 'Advanz Pharma UK & Ireland Ltd'. This Methodological Note will be cross-referenced on all of ADVANZ PHARMA's ABPI platforms.

The principles applied in this methodological note are relevant to the UK 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 the UK. This includes employees of ADVANZ PHARMA whose primary occupation is that of a practising health professional.

In the UK, HCP includes ‘other relevant decision makers’ (“ORDMs”). ADVANZ PHARMA regards all employees of NHS or private HCOs as HCPs or ORDMs regardless of employment status.

Transfers of value for HCPs who are retired at the time of the activity/engagement with ADVANZ PHARMA will be disclosed under Member of the Public.

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 the UK; or

an organisation through which one or more HCPs provide services.

- Individuals representing patient organisations: means a person who is mandated to represent and express the views of a patient organisation.
- Other Disclosable Parties (ODP): Individuals representing patient organisations, and members of the public, including patients and journalists.
- 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

1. Transfers of value to healthcare professionals (HCPs):
 - i. Receipt of support for attendance at third party led educational meetings including registration fees and logistics (travel and accommodation). Costs related to subsistence (food) are not declared but the meal costs are regulated by strict industry guidelines;
 - ii. Contracted services and expenses relating to the consultancy/speaker services;
 - iii. Market access and market research costs where the identity of the individual is known to ADVANZ PHARMA. Where these activities are “blind” or unknown to ADVANZ PHARMA, these disclosures are not made.
2. Transfers of value to healthcare organisations (HCOs):
 - i. For payments made to medical associations, healthcare organisations or institutions in relation to educational or scientific meetings. This includes direct funding such as sponsorship fees, fees paid for exhibition stands and indirect payments such as to a logistics agency/secretariat acting on behalf of the HCO.
 - ii. Fees for service paid to institutions, organisations or associations;
 - iii. Donations and grants for medical educational projects. ADVANZ PHARMA’s funding policies in these circumstances require that ADVANZ PHARMA has no influence over the details of the project. As ADVANZ PHARMA would not influence or select HCPs involved in such projects, ADVANZ PHARMA would disclose such payments under an HCO category where such definition is met by the independent company;

Note: Where ADVANZ PHARMA 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 ADVANZ PHARMA is not aware of the identity of recipient HCPs, the grant is declared against the named healthcare organisation.

- iv. Collaborative or joint working projects;
- v. Benefits in kind will be disclosed against the HCO and must be supported by a written contract detailing the value of the benefit provided for disclosure purposes.

Note: For third party sponsorship payments made to a non-HCO (e.g. for a medical educational event) with an HCP audience, this will be disclosed against the non-HCO entity.

3. Transfers of value to patient organisations (POs):

- i. Contracted services and expenses relating to the consultancy/speaker services;
- ii. For payments made to support funding of a medical or educational event or meeting. This includes direct and indirect support;
- iii. Donations and grants for medical educational or scientific projects;
- iv. Collaborative or joint workings.
- v. Benefits in kind will be disclosed against the PO and must be supported by a written contract detailing the value of the benefit provided for disclosure purposes.

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

For simplicity, ADVANZ PHARMA has maintained all of their required UK disclosures for ToV from each of their legal entities on a single portal named 'Advanz Pharma UK & Ireland Ltd'. This Methodological Note will be cross-reference on all of ADVANZ PHARMA's APBI platforms.

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.

2.4 ToVs date

The reporting period is by calendar year (1st January 2025 to 31st 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 UK HCP, HCO, PO or ODP 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/ODPs 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/ODP 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, HCOs or ODPs. 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/ODP 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

N/A

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 UK HCP, HCO, PO or ODP does not receive the benefit due to non-participation, ADVANZ PHARMA will not disclose ToVs against such HCP, HCO, PO or ODP.

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 UK-based HCP or organisations by ADVANZ PHARMA overseas operations are disclosed within the UK.

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

Each vendor used by ADVANZ PHARMA 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, 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 UK HCP, HCO, PO or ODP 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.

For collaborative working projects, ADVANZ PHARMA would disclose all transfers of value made by ADVANZ PHARMA, and the executive summaries would be published on the corporate website.

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 UK Medical Director.

4.0 Data protection legal basis

4.1 Consent collection

In accordance with Data Privacy law, ADVANZ PHARMA has obtained and retained records of consent from HCPs on an individual activity basis prior to disclosing personal data such as individual transfers of value. Where permission has not been obtained or where HCPs have refused consent, ADVANZ PHARMA has declared the total

spend as 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.

ADVANZ PHARMA are transitioning to Legitimate Interests and where contracts have been used with the appropriate legitimate interest wording, these will be disclosed as individually named payments. Where this isn't yet the case, individual consent will be sought and payments will be disclosed accordingly as mentioned above.

UK 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.

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

ODP, Journalists and Member of the Public disclosures are not made on a named basis and therefore consent is not required.

Research and development will be disclosed in aggregate for all UK 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

ADVANZ PHARMA uses Legitimate Interest as a lawful basis to process personal information about an individual to publically disclose ToVs on Disclosure UK. By using Legitimate Interest for ToV disclosure, ADVANZ PHARMA can fully commit its transparency goals that are aligned to the pharmaceutical industry and broader UK life-sciences stakeholders. ADVANZ PHARMA will notify all relevant HCPs of its intention to disclose ToV.

Objections to the publication of ToV disclosure are managed and carefully considered on a case-by-case basis, balancing the interests of the individual HCP with the legitimate interests of the company.

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 UK based HCPs and HCOs, including research related spend is disclosed on the Disclosure UK website (<https://www.abpi.org.uk/reputation/disclosure-uk/>).

All transfers of value to UK-based POs and ODPs are disclosed directly on ADVANZ PHARMA's Website (<https://www.advanzpharma.com/ethics-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.

ToVs made to ODPs are not disclosed by name and include for each category the total number of ODP, the total monetary value and a description of the support provided.

5.3 Disclosure language

English

6. Disclosure financial data

6.1 Currency

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

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.