

Servier Laboratories Ltd

Methodological note for HCP/ORDM/HCO disclosure 2025

Data year: 2025

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The following document outlines the processes and decisions taken in the preparation of the disclosure of certain transfers of value (ToV) from Servier Laboratories Limited (“Servier”) to Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs) in the United Kingdom.

Servier fully supports the objectives of the Association of the British Pharmaceutical Industry (ABPI) Code of Practice. Servier believes the Code will contribute to provide a better insight on the long-established relationship between HCPs/HCOs and pharmaceutical companies for the improvement of patient care.

The present document is intended to provide all methodological information relevant for interpretation of the information disclosed by Servier in the United Kingdom, as required by Clause 28 of the 2024 ABPI Code of Practice and applicable supplementary information.

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1. Definitions

1.1 Recipients

Healthcare Professionals (HCPs)

The term 'healthcare professional' includes members of the medical, dental, pharmacy and nursing professions and any other persons who in the course of their professional activities may administer, prescribe, purchase, recommend or supply a medicine.

This definition includes the following professionals Servier is interacting with:

- Medical doctors,
- Pharmacists,
- Midwives,
- Nurses
- Allied Health Professionals may also be disclosed as a HCP.

Other Relevant Decision Makers (ORDMs)

The term 'other relevant decision makers' particularly includes those with an NHS role who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply or use of any medicine but who are not HCPs.

Healthcare Organisations (HCOs)

The term 'healthcare organisation' means either a healthcare, medical or scientific association or organisation such as 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 Europe or an organisation through which one or more HCPs or ORDMs provide services. This definition includes the following organisations Servier interacts with: - Hospitals, - Healthcare institutions or clinics, - Group medical practices, - Relevant service providers, - Universities (Medical departments), - Foundations and charities involved in the medical domain, - Medical or learned societies, - Medical education companies, - Associations of healthcare professionals.

Professional Conference Organisers (PCO)

A company specialised in the organisation and management of congresses, conferences, seminars and similar events (all considered as events). Commercial companies involved in organisation of travel (travel agencies) or accommodation (hotels, banqueting functions in hotels, etc.) are not considered as PCOs.

Donations and Grants

Funds, benefits-in-kind or services freely given for the purpose of supporting healthcare, scientific research or education, with no consequent obligation on the recipient organisation, institution and the like to provide goods or services to the benefit of the pharmaceutical company in return. Donations are physical items, services or benefits-in-kind which may be offered or requested. Grants are the provision of funds. Donations may also be funding

provided to an eligible non-profit organisation to support its general mission or on-going charitable efforts without any benefit for Servier in return. Grants are financial contributions provided to an eligible organisation to support a specific, time-limited project or programme with identified objectives without a tangible benefit for Servier in return.

Sponsorship

Sponsorship is a contribution, in whole or in part, towards an activity (including an event/meeting or material) performed, organised, created by a healthcare organisation, patient organisation or other independent organisation. A sponsorship can be a support of congress or third-party event in exchange for a tangible benefit, such as a congress stand, promotional satellite speaker programmes, educational meetings and other third-party meetings.

Support

Provision of a financial contribution, in whole or in part, whether paid directly or indirectly to individual health professionals or other relevant decision makers to attend events/meetings. In this context it could include registration fees, costs of accommodation and travel.

Retired Healthcare Professionals/ORDMs: Where there has been a ToV provided to a HCP/ORDM and they have subsequently retired following the engagement, the ToV to this individual has still been included in the disclosure report.

Deceased Healthcare Professionals/ORDMs: Where there has been a ToV provided to a HCP/ORDM and they have subsequently passed away following the engagement, the ToV to this deceased individual has not been disclosed, if the company has been made aware.

1.2 Kind of ToVs

ToVs to HCPs and ORDMs

Servier discloses the following ToVs when provided, paid, or reimbursed to HCPs and ORDMs, or for their benefit, either directly or indirectly: - Meeting registration fees and associated travel and accommodation expenses - Fees for services and expenses related to the services or consultancy contracts.

ToVs to HCOs, including PCOs

Servier discloses the following ToVs when provided, paid or reimbursed to HCOs, including PCOs, or for their benefit, either directly or indirectly: - Donations and grants, - Fees for services, including training for Servier employees, - Expenses agreed in the services or consultancy contracts. - Sponsorship towards an event that may include contribution towards sponsorship package, registration fees, travel and accommodations, overall cost of subsistence (food and drink).

In line with PMCPA guidance, genetic testing provided as a package deal where the genetic test is a requirement of the summary of product characteristics is considered to be an ordinary course purchase. The fee paid to the HCO providing the genetic testing service is therefore disclosed as fee for service. Homecare is also provided as package deal. As such, disclosure is made as fee-for-service to the third-party HCO.

ToVs related to Research and Development (R&D) Activities

R&D ToVs disclosed by Servier consist of ToVs to HCPs and HCOs related to the planning or conduct of: - Non-Clinical Studies (laboratory), - Clinical Trials - Non-interventional studies that are prospective in nature and that involve the collection of patient data from or on behalf of individual HCPs, or groups of HCPs specifically for the study R&D ToVs also include ToVs to PCOs. ToVs to commercial companies involved in organisation of patient travel and accommodation (travel agencies) are not disclosed. All R&D ToVs are disclosed in aggregate.

2. Disclosure's Scope

2.1 Products concerned

All transfers listed relate to prescription only medicines (POMs) as Servier does not have any activities in "over the counter" (OTC) medicines or medical devices.

2.2 Company concerned

A Group process is implemented to ensure the local affiliate (Servier UK) disclosure includes all ToVs/Crossborder interactions provided by companies of the Servier Group, either locally or in other countries, during the previous calendar year (1st January to 31st December).

2.3 Excluded ToVs

Excluded ToVs

The ToVs corresponding to the following categories or provided in relation with the following activities, are not included in the disclosed information:

- Subsistence (meals and drinks), unless the ToV forms an integral part of a sponsorship agreement towards a third-party event
- Commercial activities that are part of the ordinary course of business including sales of medicinal products,
- Grants, donations and sponsorship ToVs to patient organisations (POs), which are disclosed separately from the ABPI platform and are located on the Servier company website.

TOVs to the public including patients and journalists are disclosed separately on the Servier UK company website. This covers fees for speaking at meetings, assistance with training, participating in advisory boards, advising on the design etc. of clinical trials and participating in market research where such participation involves remuneration and/or

travel.

2.4 ToVs date

The date used to define the year of disclosure corresponds to the date of the financial payment made to the recipient in the case of direct ToV, or the date where the benefit is transferred to the recipient in the case of indirect ToV.

2.5 Direct ToVs

For UK direct ToVs, all recipients are individually identified in our financial system, with the classification of each payment recorded at the time of entry.

2.6 Indirect ToVs

UK indirect ToVs are identified and segregated at the time of recording in the financial system. Data from other sources (internal databases) were then used to assign these ToVs to the relevant recipients.

Indirect ToV might include money from sponsorship package given to third-parties entities such as venues/restaurants and they are disclosed to the final beneficiaries being the HCOs.

2.7 Non-monetary ToVs

Any non-monetary transfers have been identified and valued at an appropriate market rate. Some donations as being non-monetary includes agency time.

2.8 ToVs in case of partial attendances or cancellation and refund

Where a HCP/HCO does not receive any benefit, due to cancellation of an event, costs such as cancelling hotel bookings or accommodation are not reported. In case of partial attendance the actual ToVs provided to a recipient will be disclosed, unless the ToV can be refunded.

2.9 Cross-border activities

A Servier Group reporting platform is implemented to ensure the local disclosure by any country affiliate can include all ToVs relevant to that country, irrespective of where in the Servier Group the payment originated.

All ToVs initiated by any country affiliate of the Group are thus captured for disclosure in the country where the physical address or principal place of practice of the

recipient is located.

2.10 R&D

All R&D ToVs are disclosed in aggregate.

R&D ToVs disclosed by Servier consist of ToVs to HCPs and HCOs related to the planning or conduct of:

- Non-Clinical Studies (laboratory)
- Clinical Trials
- Non-interventional studies that are prospective in nature and that involve the collection of patient data from or on behalf of individual HCPs, or groups of, HCPs specifically for the study.

R&D ToVs Investigational Sponsored Studies, defined as unsolicited, independent research, prospective or retrospective, irrespective of whether the investigator or the organisation (academic, private, or state) acts as sponsor, where SERVIER provides support in the form of the study medication and/or financing and/or support for publication.

2.11 Voluntary disclosure

Not Applicable

3. Specific considerations

3.1 Country unique identifier

Not Applicable

3.2 Self-incorporated HCP

If a healthcare organisation consists of only one health professional or other relevant decision maker, then it would be subject to the requirements in the Code regarding individual health professionals.

3.3 Multi-year agreements

Multi-year agreements refer to contracts that generate ToVs beyond a period of twelve months. This kind of agreement has no impact on the disclosure and the date of each ToV during the calendar year, it is also based on the payment scheme which is taken into consideration for the purpose of the disclosure

3.4 Country specificities

Not Applicable

3.5 Quality Checks

Prior to reporting, Servier internal processes ensures that ToVs made to HCPs, ORDMs, HCOs and POs are accurately collected in Servier. Data quality checks are performed through multiple internal departments such as finance, medical and over seen by compliance.

4. Data protection legal basis

4.1 Consent collection

Where HCPs exercise their right under the Data Protection Act or under the General, Data Protection Regulation (GDPR) to object to individual disclosure, those ToVs are reported in aggregate.

4.2 Legitimate interests

Servier introduced legitimate interests as the basis during the latter part of 2023 therefore Servier does not ask the HCP for permission to publish their name and practice address with the value received on Disclosure UK. Whilst no longer asking for formal consent, the company has a responsibility to be clear about their intentions with the HCP and must allow individuals to exercise their right to raise objections.

Described within the contract Annex, is the process where an HCP can withdraw consent by emailing DataPrivacy-UK@servier.com explaining why consent should be withdrawn. If the objection is deemed valid, the disclosed HCP data for whom an objection has been raised will be disclosed on an aggregate basis.

Partial Disclosure:

No individuals have objected to partial disclosure. This is where an individual HCP/ORDM requests that some payments are disclosed on an individual basis and some in aggregate. Where a HCP/ORDM has objected to Legitimate Interest, all related ToVs provided to this individual in 2025 have been disclosed in aggregate.

5. Form of disclosure

5.1 Date of publication

The date of publication is 30/06/2026.

This date has been defined in accordance with the ABPI Code of Practice

5.2 Disclosure platform

The publication is provided through the local association's website:

<https://search.disclosureuk.org.uk>

5.3 Disclosure language

The publication is provided in English

6. Disclosure financial data

6.1 Currency

The currency used for the current publication is GBP (Pound Sterling). For ToVs involving the use of foreign currencies, amounts are converted from the initial currency to the publication currency according to the Servier Group Monthly Average Exchange Rate applicable at the date of the ToV.

6.2 VAT included or excluded

Financial amounts indicated in the publication are expressed inclusive of VAT, where applicable.

6.3 Calculation rules

In the case of direct payments, the date of the payment is considered the ToV date.

In the case of indirect payments, the date the ToV took place such as the date of the meeting was used.

Transfers of value made during the reporting period are totalled—either by individual recipient or in aggregated form—in line with the segmentation required by the disclosure template.

7. Additional Information

[Not Applicable]