

Tillotts Pharma UK: Methodological note for HCP/ORDM/HCO disclosure 2025

Data year: 2025

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This methodological note explains the data disclosed by Tillotts Pharma UK Ltd for the 2025 reporting period and summarises the methodologies used to prepare the disclosure. Its purpose is to support understanding of the published transfers of value. Publication of this methodological note alongside the disclosure dataset is required under Clause 28.6 of the ABPI Code of Practice and forms part of the standardised EFPIA disclosure framework used for 2025 onward.

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1 Definitions

1.1 Recipients

Healthcare professionals (HCPs): 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.

Other relevant decision makers (ORMDs): Employed in the NHS at a role who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply or use of any medicine but who are not health professionals.

Healthcare organisations (HCOs): Either a healthcare, medical or scientific association or organisation such as a hospital, clinic, foundation, university or other address, place of incorporation or primary place of operation is in Europe or an organisation through which one or more health professionals or other relevant decision makers provide services.

ToVs provided to HCPs or ORDMs who retire during the reporting period are disclosed if the transfer relates to activities undertaken while they were practising.

Where a recipient is confirmed as deceased before publication, Tillotts follows PMCPA guidance, including the Q&A on publishing data about deceased health professionals, to determine whether the ToVs remain individually disclosed or must be aggregated.

1.2 Kind of ToVs

Transfers of value include honoraria and related expenses for contracted services, as well as support for HCPs and ORDMs to attend educational events or meetings; donations, grants, collaborative working (including joint working) and sponsorship to HCOs, including contributions to the costs of events; donations, grants, sponsorship and contracted services

provided to patient organisations, disclosed individually as required under Clause 29; contracted services provided by members of the public (including patients and journalists), disclosed in aggregate in accordance with Clause 30; Research and Development transfers disclosed in aggregate only, including clinical trials and prospective non-interventional studies; indirect transfers made via intermediaries where an identifiable beneficiary exists; and cross-border activities made by Tillotts affiliates to UK recipients

2 Disclosure's Scope

2.1 Products concerned

Disclosures relate to prescription-only medicines. Tillotts Pharma UK Ltd does not market over-the-counter medicines. One product includes medical device components; these are included in disclosure only insofar as they form part of the prescription medicine presentation. No stand alone medical device transfers of value are included.

2.2 Company concerned

Disclosures cover all transfers of value made to UK based recipients by Tillotts Pharma UK Ltd as well as by Tillotts Pharma AG and other Tillotts affiliates, with all cross-border activities consolidated into the UK dataset rather than reported separately. If the company name or structure changes in the future, such changes will be described in this section and cross referenced so that disclosures from previous years can still be identified and tracked by the public.

2.3 Excluded ToVs

Transfers not considered transfers of value under Clause 1.25 are excluded from this disclosure. These include product samples, ordinary-course purchases and sales, and subsistence provided in accordance with Clause 10.1. Transfers to patient organisations and members of the public are also out of scope for this methodological note and are disclosed separately where required under Clauses 29 and 30.

2.4 ToVs date

The disclosure covers transfers of value related to activities delivered during the 2025 calendar year.

2.5 Direct ToVs

Direct transfers of value include payments made directly to individuals or organisations for contracted services (such as honoraria, consultancy and associated expenses), along with direct support for attendance at educational events, including registration fees, travel and accommodation. Direct ToVs also include donations, grants and sponsorship provided to healthcare organisations, as well as contracted services provided to patient organisations and members of the public, disclosed in accordance with the ABPI Code.

2.6 Indirect ToVs

Indirect transfers of value include payments made through third party intermediaries where the ultimate beneficiary is an identifiable HCP or HCO. These activities may involve support routed via event agencies or third party congress organisers, medical communications or educational partners delivering activities on behalf of Tillotts, or cross-border support provided by affiliated Tillotts entities to UK recipients. Indirect ToVs are disclosed once only, against the relevant individual or organisation.

2.7 Non-monetary ToVs

Non-monetary transfers of value include in kind contributions provided to identifiable HCPs or HCOs that do not involve direct financial payment, such as the provision of staff time or other non-financial resources delivered as part of collaborative activities. These transfers are disclosed at the value of the benefit provided.

The value of non-monetary ToVs (e.g., staff time provided as part of collaborative activities) is calculated using either the third-party invoiced amount where applicable, or internal cost estimation based on hourly rates of personnel involved, multiplied by hours contributed.

2.8 ToVs in case of partial attendances or cancellation and refund

Tillotts Pharma UK Ltd keeps attendance records for all supported congresses and meetings. Transfers of value are disclosed only where the HCP actually attends and therefore receives a benefit in kind. If an HCP does not attend, no ToV is disclosed, even if certain costs (such as non-refundable accommodation) are charged to Tillotts, as no benefit was received by the individual. Where partial attendance occurs, only the portion of support actually used by the HCP is disclosed. Refunds or credit notes received by Tillotts are deducted from the relevant ToV

2.9 Cross-border activities

Transfers of value provided to UK recipients by Tillotts affiliates outside the UK are consolidated and disclosed within the UK dataset. Tillotts Pharma UK Ltd receives cross-border data from affiliates and applies the same categorisation and verification checks used for UK generated ToVs. Cross-border transfers are disclosed once only, against the relevant UK HCP or HCO.

2.10 R&D

Research & Development transfers of value are disclosed in the aggregate and encompass transfers of value to UK health professionals and UK health care organisations related to non-clinical studies (as defined in the OECD Principles of Good Laboratory Practice), clinical trials (as defined in Regulation 536/2014), non-interventional studies (prospective in nature and involving the collection of data from, or on behalf of, individual or groups of health professionals specifically for the study), as well as costs that are subsidiary to these activities.

2.11 Voluntary disclosure

Tillotts Pharma UK Ltd does not include any voluntary disclosures.

3 Specific considerations

3.1 Country unique identifier

Tillotts Pharma UK Ltd does not use or submit professional identifiers (such as GMC numbers) to Disclosure UK. Internally, HCP and HCO details are cross-checked using the individual's name, primary place of practice, contract details and records held within our customer relationship management system. No commercial identifiers are published as part of the disclosure.

3.2 Self-incorporated HCP

Where a health professional provides services through their own limited company, Tillotts Pharma UK Ltd discloses the transfer of value against the individual health professional rather than the company, in line with Clauses 1.8 and 1.25 of the ABPI Code. If an individual does not permit individual disclosure for contracted services, the relevant transfers are included in the aggregate total.

3.3 Multi-year agreements

For multi-year agreements, transfers of value are allocated to the calendar year in which the relevant services or activities take place. Prepayments are recognised when the activity occurs, and any adjustments such as credit notes are applied to the year of the original transfer.

3.4 Country specificities

Tillotts Pharma UK Ltd did not undertake any collaborative working or joint working projects during the reporting period. Consequently, no shared Transfers of Value required apportioning between companies, and no collaborative working executive summaries (NOTE G of the ABPI mandatory disclosure template) were produced for 2025.

If collaborative working projects are undertaken in future years, Tillotts will disclose the associated ToVs in accordance with ABPI requirements and will publish links to the relevant executive summaries as required.

3.5 Quality Checks

Prior to submission, Tillotts Pharma UK Ltd undertakes internal quality checks to ensure that disclosures are accurate and complete. These checks include verifying data from internal systems such as finance and customer relationship management, cross-checking transfers of value against contracts and agreements, confirming correct categorisation, and reviewing currency, VAT and data-protection requirements. All checks are completed and reviewed internally before final approval and submission to Disclosure UK.

4 Data protection legal basis

4.1 Consent collection

For contracted services (honoraria, consultancy, speaker engagements and related expenses), Tillotts Pharma UK Ltd uses Consent as the lawful basis for publishing individual-level data. Recipients are informed at the point of contracting through agreements and privacy notices. Partial consents are not accepted, in line with EFPIA guidance. Where consent is not given or is withdrawn, the related transfers of value are disclosed in aggregate. Withdrawals apply to future disclosures and may be submitted via dataprivacy@tillotts.com. Transfers to patient organisations (Clause 29) do not require consent; transfers to members of the public (Clause 30) are disclosed in aggregate only. Cross-border processing is carried out under appropriate safeguards.

4.2 Legitimate interests

For support to attend educational events and meetings, including registration fees, travel and accommodation, Tillotts relies on Legitimate Interests under Article 6(1)(f) UK GDPR as outlined in its Legitimate Interests Assessment. Recipients are informed of this lawful basis through agreements and privacy information, and they may object via dataprivacy@tillotts.com or through the Disclosure UK portal. All objections are reviewed through a repeat balancing test with no automatic opt-out, and where an individual's rights outweigh Tillotts' interests, the transfer is disclosed in aggregate for future years. Appropriate safeguards are in place, including data minimisation, accuracy checks, transparency measures and secure processing.

5 Form of disclosure

5.1 Date of publication

30/06/26

5.2 Disclosure platform

<http://www.disclosureuk.org.uk>

5.3 Disclosure language

English

6 Disclosure financial data

6.1 Currency

All disclosures are reported in GBP (£). Where payments were originally made in another currency, Tillotts Pharma UK Ltd converts the amount into GBP using either the exchange rate applicable on the date of payment or the European Central Bank's average annual exchange rate for the relevant year, depending on the documentation available.

6.2 VAT included or excluded

Transfers of value are reported excluding VAT unless VAT is irrecoverable, in which case the gross amount is disclosed.

6.3 Calculation rules

Transfers of value are calculated using the actual cost incurred by Tillotts Pharma UK Ltd. In-kind or non-monetary transfers of value are disclosed at the value paid to secure the benefit provided. Where expenses include both business and non-business elements, only the business-related portion is disclosed. All values are rounded to two decimal places for publication

7 Additional Information

No additional methodological considerations apply