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Aguettant Limited: Methodological note for HCP/ORDM/HCO disclosure 2025

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Aguettant Limited recognises the importance of transparency in its interactions with healthcare professionals (HCPs), healthcare organisations (HCOs), other relevant decision makers (ORDMs), patient organisations, and the public. Although not an official member of the Association of the British Pharmaceutical Industry (ABPI), Aguetant Limited has given formal agreement to adhere to the 'ABPI Code of Practice for the Pharmaceutical Industry 2024' and accepts the jurisdiction of the Prescription Medicines Code of Practice Authority (PMCPA).

Contents

1	Definitions	2
1.1	Recipients	2
1.2	Kind of ToVs	2
2	Disclosure's Scope	3
2.1	Products concerned.....	3
2.2	Company concerned.....	3
2.3	Excluded ToVs.....	3
2.4	ToVs date.....	4
2.5	Direct ToVs.....	4
2.6	Indirect ToVs	5
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

Aguettant Limited, in collaboration with its parent company and other affiliates, diligently records all transfers of value made to UK-based HCPs, ORDMs, and HCOs. Each transfer is tracked contemporaneously to ensure accuracy in reporting. Transfers of value considered for the 2025 disclosure include:

- Consultancy Fees paid to HCPs (for speaker roles, advisory boards, safety talks) and associated expenses.
- Contributions toward the costs of events (e.g., sponsorship fees for conferences, exhibitions and meetings) and associated registration fees and expenses.

1.2 Kind of ToVs

The transfer of value (TOV) disclosures for the 2025 reporting period are conducted in accordance with the 'ABPI Code of Practice for the Pharmaceutical Industry 2024'.

Specifically, the following clauses of the Code are relevant to this disclosure:

- **Collaborative working**, including joint working, in accordance with Clause 20.
- **Donations and grants** provided to healthcare organisations, institutions and other organisations in accordance with Clause 23.

- **Fees and expenses paid for contracted services** between companies and institutions, organisations or associations of health professionals, in accordance with Clause 24.6.
- **Support of attendance by health professionals and other relevant decision makers at events/meetings** whether paid directly, indirectly or via another party in accordance with Clause 10.11.
- **Fees and expenses paid for contracted services** to health professionals and other relevant decision makers, or to their employers on their behalf, in relation to Clause 24.6.
- **Sponsorship**, including contributions to costs related to events/meetings paid to healthcare organisations or to organisations managing events on their behalf, which may include support of health professionals not known to the company via the healthcare organisation by way of registration fees, accommodation and travel, in accordance with Clause 10.12.
- **Interactions with the public including patients, journalists and patient organisations**, in accordance with Clauses 26-27.

While Aguetant Limited is not an ABPI member, we align with the Code and ensure full compliance with its principles regarding transparency.

2 Disclosure's Scope

2.1 Products concerned

Products concerned include the company's prescription-only medicines (POMs) that are associated with the transfers of value disclosed. Aguetant manufacture injectable medicines, solutions and analgesics. These include pre-filled (polypropylene) syringes, pre-diluted glass vials and pre-diluted glass ampoules.

Attribution to a specific POM is based on the content and purpose of the activity. In cases where the activity is not linked to a specific POM, including activities related to a therapeutic area or general scientific exchange, the transfer of value is classified as non-product specific.

The majority of events hosted by Aguetant in 2025 involving HCP participation or sponsorship to attend or speak, related to the general topic of safety improvements associated with pre-filled injectable medicines. These activities were not focused on specific medicinal products but addressed broader clinical and safety considerations within healthcare.

2.2 Company concerned

Aguettant Ltd, its parent company and other affiliates.

2.3 Excluded ToVs

Aguettant Ltd has not disclosed routine subsistence provided during meetings between Key Account Managers and healthcare professionals within hospital settings. In accordance with Clause 28.2 of the Association of the British Pharmaceutical Industry 2024 Code of Practice, 'where a company supports individual healthcare professionals or other relevant decision

makers (directly or indirectly) to attend events/meetings, there is no requirement to disclose subsistence (food and drink)'. Accordingly, such transfers of value are excluded from disclosure.

2.4 ToVs date

The date of transfer of value (ToV date) is the date on which the payment was made by Aguettant Ltd. Transfers of value are reported in the disclosure period in which the payment occurred (2025), regardless of when the related activity took place.

For payments made in currencies other than GBP, the amounts have been converted into GBP using the monthly exchange rate for the corresponding month in which the payment was made.

2.5 Direct ToVs

Contributions Towards the Costs of Events:

Aguettant Limited attended 25 events throughout 2025. These events included medical and scientific conferences/exhibitions and meetings. The fees paid to healthcare organisations or third-party event organisers for exhibition packages, registration fees, and sponsorship costs are fully disclosed.

Consultancy Fees Paid to Healthcare Professionals:

- One consultant was paid for their role as a speaker during a company-sponsored event, with associated expenses such as travel, and accommodation also covered. The payment was made in euros, and the amount converted to GBP using the exchange rate for the month the payment took place. The event took place outside of the UK in Barcelona, Spain.
- Six HCPs were sponsored to attend a company-held event, with associated expenses such as travel and accommodation covered by Aguettant and Aguettant Ltd. One Consultant was paid additionally for their role as a speaker during the event. The event took place outside of the UK in Lyon, France.
- One consultant was sponsored to deliver a presentation at a company-sponsored event, with associated expenses such as travel and accommodation covered. This sponsorship contributed directly to his continuing professional development. The event took place in the UK.
- One consultant had their travel and accommodation expenses covered in order to attend an event. His participation in the event contributed directly to his continuing professional development. The event took place in the UK.
- One consultant was paid for their role to provide clinical expertise and findings on the use of one of our products for a promotional set of videos. The event took place in the UK.
- Finally, one consultant was sponsored to provide educational support at two company-sponsored events. These took place in the UK.

2.6 Indirect ToVs

Transfers of value were provided as direct payments to a charitable fund, which were used to support the sponsorship of one consultant's attendance at two exhibitions.

2.7 Non-monetary ToVs

Event registration fees, travel, accommodation and sponsorship of attendance of a HCP at meetings or events have been disclosed at their monetary value and attributed to the relevant recipient.

2.8 ToVs in case of partial attendances or cancellation and refund

In 2025, we cancelled our participation in two exhibitions. For one event, we received a 50% refund of the registration fees. For the second event, a 10% cancellation fee was applied, with the remaining balance refunded.

2.9 Cross-border activities

Although two Aguetant-held events took place outside of the UK in 2025, we continued to apply the principles and requirements of the Association of the British Pharmaceutical Industry Code of Practice to all relevant activities.

In line with Clause 2.9 (Cross-border activities), the Code governs interactions with healthcare professionals regardless of event location. Sponsorship of HCP attendance at international events is conducted in accordance with applicable transparency requirements, with appropriate documentation retained to support transfer of value disclosure and compliance with relevant hospitality and event-related provisions.

2.10 R&D

No transfers of value related to research and development (R&D) are reported for the 2025 reporting period.

2.11 Voluntary disclosure

No voluntary disclosures are reported for the 2025 reporting period. All transfers of value disclosed are limited to those required under applicable transparency obligations.

3 Specific considerations

3.1 Country unique identifier

GB

3.2 Self-incorporated HCP

No self-incorporated healthcare professionals (HCPs) have been identified or reported for the 2025 reporting period.

3.3 Multi-year agreements

No multi-year agreements with healthcare professionals, other relevant decision makers, or healthcare organisations have been identified or reported for the relevant reporting period.

3.4 Country specificities

Aguettant (parent company of Aguettant Ltd) applies the relevant local laws, codes of practice, and guidance in each country in which it operates.

Aguettant Ltd applies the ABPI disclosure requirements in preparing and reporting transfers of value in the United Kingdom, ensuring compliance with applicable UK transparency rules and guidance.

3.5 Quality Checks

Before disclosure to the central platform managed by the ABPI, the records are cross-checked and internally verified.

Aguettant conducts an internal review to confirm that all required transfers of value have been appropriately captured, validated, and reconciled.

4 Data protection legal basis

4.1 Consent collection

Aguettant Limited is committed to maintaining confidentiality and adhering to data privacy laws, including the General Data Protection Regulation (GDPR). All personal data associated with the transfers of value (e.g., names, roles, and payments to individual HCPs) is disclosed only with the explicit consent of the concerned individuals. This consent is obtained through contractual agreements signed by HCPs with Aguettant Limited, which grants the company permission to disclose relevant financial information as required by the ABPI Code of Practice. Contractual agreements are either drawn up for specific events or established on a yearly basis, with regular reviews to ensure they remain up-to-date and compliant with relevant regulations.

All TOV data is collected by the Senior Leadership Team, stored securely, and then added to the PMCPA mandatory template in preparation for the declaration disclosure. This system captures all relevant financial transactions, ensuring transparency and consistency.

4.2 Legitimate interests

All Aguettant Ltd's interactions with HCPs/HCOs are based on legitimate business or scientific needs and are conducted in accordance with ABPI Code Clause 4.2, without any intent to improperly influence clinical or commercial decisions.

5 Form of disclosure

5.1 Date of publication

March 2026.

5.2 Disclosure platform

All TOVs made by Aguettant Limited, its parent company, and other affiliates from 01 January to 31 December 2025 have been disclosed on the central platform, Disclosure UK, managed by the ABPI, in accordance with the guidelines set out in the ABPI 'Code of Practice for the Pharmaceutical Industry 2024'.

5.3 Disclosure language

English

6 Disclosure financial data

6.1 Currency

GBP (£)

For payments made in currencies other than GBP, the amounts have been converted into GBP using the monthly exchange rate for the corresponding month in which the payment was made. This ensures consistency and fairness in the reporting of financial data across different currencies.

6.2 VAT included or excluded

The transfers of value are disclosed exclusive of VAT, except where VAT is non-reclaimable by Aguettant Limited. In such cases, VAT is included in the disclosed transfer of value.

6.3 Calculation rules

Transfers of value are recorded based on the actual amounts incurred by Aguettant Ltd, including fees, travel, accommodation, and other associated costs where applicable. Where costs are shared or relate to multiple activities or recipients, they are allocated on a reasonable and consistent basis.

Currency conversions are applied using exchange rates for the corresponding month in which the payment was made.

Additional Information

- **Reporting Period:** This disclosure only includes payments made within the calendar year 2025 (1 January to 31 December 2025).
- **Payment Dates:** Only payments made in 2025 are reported, regardless of when the agreements or contracts were signed.