

HCP/ORDM/HCO Methodological Note Template



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[Britannia Pharmaceutical Ltd Methodological note for HCP/ORDM/HCO disclosure 2025

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Britannia Pharmaceuticals Ltd (BPL) is a part of STADA Arzneimittel AG, specialising in neurological pharmaceuticals. BPL believes transparency and honesty are essential in maintaining and upholding confidence in our products and the pharmaceutical industry. BPL regularly collaborates with various Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs) and Healthcare Organisations (HCOs) in the interests of patients. These collaborations are essential for the continuous improvement of patient care and the sharing of knowledge which may be relevant to clinical decision making.

BPL are committed to ensuring transparency is always respected. Acting with integrity is one of STADA's core business values, ensuring the way BPL conducts business with openness and to the highest ethical standards, in caring for people's health as a trusted partner.

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1 Definitions

1.1 Recipients

This methodological note details the approach taken by BPL with regards to the collection and submission of all Transfers of Value (ToVs) to HCPs, ORDMs and HCOs based in the United Kingdom (UK), and UK Research & Development, as mandated in the Association of the British Pharmaceutical Industry (ABPI) Code of Practice. This methodological note covers the reporting period of 1st January 2025 to 31st December 2025.

ToVs made to Patient Organisations and members of public, including journalists and patients, are disclosed on BPL's corporate website. Links to the relevant pages can be found on the Disclosure UK website.

Health professional (HCP): includes any member of the medical, dental, pharmacy or nursing profession and any other person who in the course of their professional activities may administer, prescribe, purchase, recommend or supply a medicine. In relation to the annual disclosure of transfers of value (ABPI Code of Practice Clause 28), the term also includes any employee of a pharmaceutical company whose primary occupation is that of a practising health professional.

Healthcare organisation (HCO): 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 health professionals or other relevant decision makers provide services. 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.

Other relevant decision maker (ORDM): includes someone 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 is not a health professional.

1.2 Kind of ToVs

BPL follow the ABPI Code of Practice definition of the reporting categories. The following table provides examples (list not exhaustive) of the specific activities reported under each category.

Reporting category	Examples of specific activities
Collaborative Working	Note: BPL did not participate in any Collaborative Working in 2025
Donations and grants to HCOs	Grants and donations (in cash or in kind) for the purpose of supporting healthcare, scientific research, or education
Contribution to costs of Events: Sponsorship agreements with HCOs / third party organisations appointed by HCOs to manage an Event	ToVs provided to HCOs or to a third-party agency on behalf of an HCO with regards to the cost of events For example: <ul style="list-style-type: none"> - Funding an event in return for a display booth or stand area at the event - Satellite symposia at a congress - Package deal – Britannia Nurse Service Note: the nurse service cannot be disclosed elsewhere on the template as it is not considered a grant, donation, collaborative working or a contracted service (as per note M)
Contribution to costs of Events: Registration Fees	HCP support for registration fees provided to HCPs to attend educational events
Contribution to costs of Events: Travel and accommodation	HCP support provided to HCPs to attend educational events <ul style="list-style-type: none"> - Travel (e.g., flight, train, taxi, mileage reimbursement, parking) - Accommodation - Travel and accommodation expenses associated with supporting HCPs to attend 3rd party conferences/company funded meetings Note: <ul style="list-style-type: none"> - Where group accommodation and transport has been provided as a ToV, the total cost has been divided by the number of attendees and this amount has been disclosed - Travel and accommodation costs related to services or research & development activities are not covered in this category
Contracted Services: Fees	Fees paid for services and consultancy provided as contracted services <ul style="list-style-type: none"> - Speaker engagements - Advisory boards and other consulting engagements - Data analysis, medical writing, and development of educational materials

	- General consulting and advising
Contracted Services: Expenses	<p>Expenses incurred during contracted services</p> <ul style="list-style-type: none"> - Travel (e.g. flight, train, taxi, mileage reimbursement and parking) - Accommodation <p>Note: Where BPL have been unable to separate expenses from the fee for service, these amounts have been disclosed together as a total fee</p>
Research & Development	<p>Research and Development ToVs provided to UK HCPs or HCOs related to the planning and conduct of:</p> <ul style="list-style-type: none"> - Non-clinical studies (as defined in the OECD Principles on Good Laboratory Practice) - Clinical trials (as defined in Regulation 536/2014) - Non-interventional studies that are prospective in nature and that involve the collection of patient data from or on behalf of individuals or groups of health professionals specifically for the study <p>Note: ToVs related to research activities which do not fall under the definition of Research & Development* (e.g. retrospective non-interventional studies) are not covered in this category.</p>

2 Disclosure's Scope

2.1 Products concerned

The ToVs included in this disclosure relate to BPL's prescription only medications.

2.2 Company concerned

This report includes ToVs made by BPL and STADA affiliates to HCPs, ORDMs and HCOs based in the United Kingdom.

2.3 Excluded ToVs

ToVs excluding from the scope of disclosure include:

- Medical items and ancillaries that are provided to patient free of charge that are required for the administration of BPL medicines are excluded from our disclosure.
- ToVs that are part of the ordinary course of purchase and sale of medicinal products, such as discounts and price reductions.
- Subsistence is not within the scope of the ABPI disclosure obligations and as such no costs associated purely with subsistence have been disclosed, unless included in a 'day delegate rate' and BPL have been unable to separate the subsistence cost from the room hire.

2.4 ToVs date

ToVs disclosed are those that have a reporting date between 1st January 2025 and 31st December 2025. Disclosed ToVs also include some activities conducted in 2024 where payment was made in 2025.

The reporting date for monetary ToVs is the date on which the payment was made, irrespective of when the activity/event occurred.

2.5 Direct ToVs

A direct transfer of value is one made directly by a company for the benefit of a recipient. The types of activities resulting in direct transfers of value include:

- Fees and expenses paid for contracted services provided to HCPs, ORDMs or HCOs
- HCP support provided directly to HCPs or ORDMs
- Sponsorship contributing to events and meetings paid to HCOs
- Grants provided to HCOs

2.6 Indirect ToVs

An indirect transfer of value is one made on behalf of a company for the benefit of a recipient or through an intermediate and where the company knows or can identify the recipient that will benefit from the transfer of value. The types of activities resulting in indirect transfers of value include:

- Via a third-party event organiser

2.7 Non-monetary ToVs

BPL has not provided any benefits in kind and non-monetary ToVs in 2025.

2.8 ToVs in case of partial attendances or cancellation and refund

In the case of cancellation of an activity, and where an HCP, ORDM or HCO has not received a ToV, the ToV has not been reported. In the case of partial attendance, any ToVs received by an HCP/ORDM have been reported.

BPL has not needed to request for a ToV refund due to partial attendance or cancellations in 2025.

2.9 Cross-border activities

BPL is part of STADA Arzneimittel AG and operates globally via affiliates and partners. Cross border payments are communicated internally and reconciled locally to ensure all relevant UK ToVs are included within this disclosure. The focus of disclosing affiliate activity is based on relevant therapeutic area as there are multiple UK affiliates.

Any payments made in Euros have been converted to Great British Pounds (GBP) based on the Euro to GBP 2025 Average exchange rate provided by the European Central Bank. This value is 0.86 GBP to 1 Euro. Any payments made in another currency have been exchanged based on the average 2025 conversion rate. The above exclusion criteria apply for cross-border payments.

2.10 R&D

Research and Development ToVs are ToVs provided to an HCO or HCP related to the planning and conduct of:

- I. Non-clinical studies (as defined in the OECD Principles on Good Laboratory Practice)
- II. Clinical trials (as defined in Regulation 536/2014)
- III. Non-interventional studies that are prospective in nature and that involve the collection of patient data from or on behalf of individuals or groups of health professionals specifically for the study.

Summaries of the types of activities included in this disclosure under the R&D definition in the ABPI Code are:

- Fees for investigator activities related to Research & Development taking place in the UK
- Activities contracted to UK Clinical Research Organisations (CROs), where indirect ToVs are made to UK HCPs/HCOs/CROs

Note: ToVs related to research activities which do not fall under the definition of Research & Development* (e.g. retrospective non-interventional studies) are not covered in this category.

2.11 Voluntary disclosure

Not applicable.

3 Specific considerations

3.1 Country unique identifier

BPL uses unique identifications (IDs) from the commercial databases of Wilmington Healthcare to disclosure ToVs provided to individual HCPs and ORDMs.

3.2 Self-incorporated HCP

TOVs provided to a company where an HCPs and ORDMs are the sole owner have been disclosed against the individual HCP or ORDM who has received the ToV.

3.3 Multi-year agreements

Disclosures of multi-year agreements have been made based on the year the actual ToV was provided. The amount that has been disclosed will be the total amount provided by BPL during the relevant reporting year.

3.4 Country specificities

Not applicable, BPL did not participate in any Collaborative Working in 2025

3.5 Quality Checks

An internal electronic system is used to track ToVs made to HCPs, ORDMs and HCOs. Details of ToVs are recorded against the HCP, ORDM and HCO record cards, within the electronic system. Finance provides a record of all payments made to HCPs/ORDMs and

HCOs, this data is used to cross check the electronic system and highlight and address any discrepancies. Additionally, the Commercial and Medical Affairs teams provide a record of ToVs they have recorded for 2025, which is used to reconcile against the payments recorded by the Finance team and the internal electronic system. Following cross checking of data, ToVs are disclosed against individuals, or as an aggregate based on disclosure consent status and HCOs, accordingly.

4 Data protection legal basis

4.1 Consent collection

BPL has adopted Legitimate interest as the legal basis for disclosure of ToVs provided to HCPs and ORDMs. In the context of ToVs, BPL does not need consent from HCPs and ORDMs to disclose TOVs on an individual basis. However, HCPs and ORDMS have the right to object to BPL processing personal data in this manner. BPL considers any objections put forward and balances them against BPL's legitimate interests. To object, an HCP/ORDM should email disclosures@britannia-pharm.com explaining the reason why any data cannot be processed. Each objection request is reviewed by BPL's Legal and Compliance teams, and a decision is taken. HCP/ORDM objections which have been honoured by BPL will have their ToV data disclosed in the aggregate amount

4.2 Legitimate interests

BPL's legitimate interests are to comply with BPL's obligations to the requirements of the ABPI Code of Practice and to help increase transparency of interactions between BPL and HCPs and ORDMs, enabling better public scrutiny of financial transactions.

BPL make HCPs and ORDMs aware of this through a Data Protection Statement within their Professional Services Contract, which describes BPL's position on legitimate interest for the processing of personal data.

5 Form of disclosure

5.1 Date of publication

[30/06/26

5.2 Disclosure platform

Disclosure UK – www.disclosureuk.org.uk

5.3 Disclosure language

English

6 Disclosure financial data

6.1 Currency

Disclosures have been made in Great British Pounds (GBP). ToVs paid in Euros have been converted to GBP using the 2025 annual average European Central Bank rate of 1 Euro = 0.86 GBP.

6.2 VAT included or excluded

Where applicable, disclosure of payments does not include VAT. Cross border ToVs may or may not include VAT depending on the data submitted to BPL from Affiliates.

6.3 Calculation rules

[Not applicable. BPL has not provided any benefits in kind and non-monetary ToVs in 2025, so no further calculations have been conducted.]

7 Additional Information

Britannia Nurse Service

BPL provides a nurse service as a package deal to HCOs. This service is covered under an honorary contract, which is a legal agreement between the BPL nurse and an HCO, that allows a BPL Specialist Nurse to work directly with patients for HCOs, providing therapy support. The Specialist Nurse is clinically responsible to, and accountable to, the HCOs' prescribing physician (and Specialist Nurse, where applicable) in the relevant service for Parkinson's Disease. BPL's Specialist Nurses work alongside HCPs to provide on-going support to Parkinson's patients once they have been prescribed BPL device aided products.

For employment and administrative matters, the Specialist Nurse reports to BPL, but BPL does not direct or control the clinical services provided by the Specialist Nurses to the HCOs' patients. The service employs nurses internally and via an external agency and is led by the Head of Clinical Nursing and NHS Liaison, who reports to the Senior Director Medical Affairs STADA Specialty. This is a package deal and is independent of the Sales team and the Commercial functions of the business.

The total cost of providing this service to the HCOs has been calculated using the total salaries from all nurses (internal and external agency) divided by the total number of HCOs who have used the BPL nurse service in 2025. This provides an average cost per HCO.

As this ToV is not considered a grant, donation, collaborative working, or a contracted service, the cost is disclosed against each receiving HCO as a 'sponsorship agreement with HCOs/Third party organisations appointed by HCOs to manage an event', as per note M of the ABPI Code of Practice Mandatory Disclosure Template.