

ABPI Disclosure Methodological Note March 2025

Data Year: 2025

Publication Year: 2026

This note describes the methods used by Bio Products Laboratory Ltd in the UK (BPL) to meet its obligations and the requirements for disclosing payments and Transfers of Value (ToV) to Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs) and Healthcare Organisations (HCOs) as outlined in the EFPIA HCP/HCO Code of Practice and reflected in the ABPI Code of Practice for the Pharmaceutical Industry.

1. Definitions

1.1 Recipients

- 1.1.1 **Healthcare Professionals (HCP)** 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.
- 1.1.2 **Healthcare Organisation (HCO)** 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 the UK, or an organisation through which one or more health professionals or other relevant decision makers provide services.
- 1.1.3 **Other Relevant Decision Maker (ORDM)** 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 health professionals.

1.2 Kinds of Transfer of Value (ToV)

The term 'transfer of value' means a direct or indirect transfer of value, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development or sale of medicines.

In the case of fees, BPL pays fair market value (FMV) in exchange for bona fide services. The services could include consulting or research-related services. Other ToVs for HCPs could include travel, lodging, meals, and registration fees. With respect to HCOs, ToVs could include sponsorships or grants.

2. Disclosure's Scope

2.1 Products Concerned

Prescription Only Medicines

2.2 Company Concerned

Disclosures made by BPL include any ToVs made to UK HCPs by any BPL-affiliated companies.

2.3 Excluded ToVs: N/A

2.4 ToV's Date: 1/1/25-31/12/25

2.5 Direct ToVs

FMV fees for bona fide services, travel, lodging, transfers, subsistence, whether paid directly or reimbursed, and registrations.

2.6 Indirect ToVs

Travel, lodging, transfers, subsistence and registrations could be managed and paid directly on behalf of BPL by a third party event organizer or agency, or reimbursed by same.

2.7 Non-monetary ToVs: N/A

2.8 ToVs in case of partial attendance or cancellation and refund: N/A

2.9 Cross-border activities

ToVs for cross-border activities are either handled directly by BPL or indirectly through a third party. In the event that an HCP has an out-of-pocket expense covered under the applicable written agreement, such expense is reimbursed at actual cost in GBP.

2.10 R&D

N/A

2.11 Voluntary disclosure

N/A

3. Specific Considerations

3.1 Country unique identifier

N/A

3.2 Self-incorporated HCP

N/A

3.3 Multi-year agreements

If any agreements extend beyond the reporting period, only payments made during the reporting period are included in the submission.

3.4 Country specificities

N/A

3.5 Quality Checks

ToVs are validated based on confirmation of the services received, approval of the invoices for such services and payments or reimbursements made in accordance with the terms of the written agreement. The agreements and payments are periodically audited.

4. Consent Collection

4.1 Consent Collection

If any HCP personal information is disclosed as part of the required disclosure of payments/transfers of value, consent has been obtained by the HCPs on an activity-by-activity basis prior to submission. Otherwise, the disclosures are made on an aggregated basis.

4.2 Legitimate Interests

N/A

5. Form of Disclosure

5.1 Date of Publication: 27/3/26

5.2 Disclosure Platform: Disclosure UK – www.disclosure.org.uk

5.3 Disclosure Language: English

6. Disclosure Financial Data

6.1 Currency: GBP

6.2 VAT: Included

6.3 Calculation Rules: N/A

7. Additional Information

N/A