

Valneva UK

Methodological note for HCP/ORDM/HCO disclosure 2025

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Introduction – As an ethical pharmaceutical company, Valneva UK Ltd takes its responsibilities under the ABPI code of practice very seriously, and therefore has clear standard operating procedures in place for the approval and processing of all transfers of value to healthcare professionals (HCPs), healthcare organisations (HCOs), other relevant decision makers (ORDMs), Patient Organisations (POs), including charities and members of the public (MoP). All requests for support from healthcare professionals and all engagement of healthcare professionals' services undergo a rigorous approval process to ensure the ABPI Code of Practice is adhered to. All transfers of value and relevant approval documentation are recorded and saved for 5 years.

Valneva has prepared this document to outline the Company's interpretations and assumptions made and methodologies used in complying with the requirements to disclose payments to Healthcare Professionals (HCPs), Healthcare Organisations (HCOs) and Other Relevant Decision Makers (ORDMs). We are now operating under the 2024 Code of Practice administered by the Prescription Medicines Code of Practice Authority (PMCPA), further in the document referred to as the Code.

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1 Definitions

1.1 Recipients

Definition of an HCP

The term 'health 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.

Disclosure will also apply to 'other relevant decision makers' (ORDMs), this 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.

Definition of an HCO

The definition of an HCO in United Kingdom of Great Britain & Northern Ireland is: 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 health professionals or ORDMs provide services.

Patient Organisations are not considered to be HCOs and are separately included in the Patient Organisation report on the Valneva website.

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 still been included in the disclosure report.

1.2 Kind of ToVs

Donations and Grants

Valneva provides support for medical or scientific education, advances in medical or scientific research, health or healthcare systems or disaster relief through financial or non-financial ToVs to legitimate, established organisations. Valneva can provide this support through:

- Contributions or funding (or referred to as Grants) to support initiatives in HCP Education, including education about healthcare systems and practices, Medical or Scientific Research, or Partnerships. Grants are only provided to organisations and arm's length arrangement is in place.
- Donations and grants are 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. They must not be provided to individuals for their personal benefit. Donations as a good or service must not bear the name of any medicine but may bear the name of the company providing them.
- Donations to a non-profit or public-sector healthcare organisation (HCO) intended to support their charitable mission and activities.
- Donations to Patient Organisations or as part of Community Investments to charities and other non-profit non-HCOs are subject to separate disclosure and thus excluded.

Donations to HCOs can be both monetary and donations in kind. Product Donations are given in circumstances of national emergency, international or national disaster relief or other genuine public health need

Sponsorship agreements

Valneva gives contributions, through financial or non-financial support to legitimate, established organisations for medical or scientific education of external stakeholders, organising or hosting educational or scientific events (including independent congresses). These contributions aim to increase the scientific or educational quality of the event and/or support with logistics in modest venues or with incidental hospitality, in line with Valneva's own ethical principles. The mandatory Sponsorship Agreements will describe the purpose of the sponsorship and for what the funds are to be used.

Sponsorship packages may also include satellite symposia and the sponsoring of speakers or faculty.

ToVs are made to either the HCO directly or to an event organiser or other third party appointed by the HCO to manage the event. In all cases, ToVs are disclosed against the HCO that ultimately benefits.

Where contributions made to HCOs include support for travel & accommodation for HCPs to attend Independent Congresses and the HCPs benefitting from this support are unknown, this payment will be assigned to the EFPIA category "Sponsorship Agreements".

Registration fees

As part of support for continuous medical education, Valneva provides support to HCOs or HCPs to cover the costs of registration fees for HCPs to attend selected independent congresses and where provided to HCOs, also for other educational/scientific events. Where these are provided to HCOs, Valneva is not involved in the selection of the HCPs.

Where these are provided to individual HCPs, the purpose of the support is to enable delegates:

- to attend presentations or participate in scientific exchange on significant developments;

All arrangements are generally paid directly to travel and or /accommodation providers or the event organiser.

Travel and Accommodation

As part of support for continuous medical education, Valneva provides support to HCOs or HCPs to cover the costs for Travel and Accommodation for HCPs to attend selected independent congresses and/or Valneva Organised Meetings and where provided to HCOs for other educational/scientific events. These costs can include costs of flights, trains, hotel accommodation, taxis, bus transfers, and other travel costs.

Fees for service and consultancy and related expenses

Valneva engages an HCP/HCO for services when there is a genuine and legitimate business need and where the HCP/HCO is qualified and appropriate to provide the services. These services are paid with a Fee for Service at Fair Market Value. These services can include among others:

- Speaking at and chairing meetings
- Training services
- Participation at advisory board meetings
- Medical writing
- Data analysis
- Development of education materials
- General consulting/advising
- Services performed as a contractor not fulfilling a permanent role in one of the marketing companies
- Services performed in connection with a third-party congress
- Retrospective non-interventional studies
- Participation in market research where such participation involves remuneration and/or travel. Payments for these services are only disclosed if Valneva is aware of the identity of those participating in the market research.

As part of the written Fee for Services Agreement, related expenses can be paid for and can include costs of flights, trains, car hire, tolls, parking fees, taxis, bus transfers, hotel accommodation and any visa costs. All costs are paid by Valneva to travel and or /accommodation providers or meeting organisers (where relevant) or reimbursed supported by appropriate receipts.

Where payments for HCP "Fee For Service Agreement "are with HCOs, these transfers of value payment will be disclosed against the institution or organisation.

2 Disclosure's Scope

2.1 Products concerned

Valneva is a science-focused company, developing innovative medicines that are prescription only medicines and interactions with HCPs/HCOs are focused on the development and promotion of prescription medicines. Consequently, only ToVs relating to prescription medicines are being disclosed.

2.2 Company concerned

Valneva UK will disclose any ToV made for UK HCPs, ORDMs or HCOs. All ToV made over seas in any part of Valneva that are made to UK HCPs, ORDMs or HCOs are disclosed in the Valneva UK ToV submission.

2.3 Excluded ToVs

Hospitality costs

As per the EFPIA Code, hospitality costs are not disclosable if in line with the limits set within the national association following Art 10 of the HCP Code (in alignment with the ABPI Code). Valneva applies these limits for Valneva Organised & Sponsored Meetings, and therefore costs of meals & drinks are excluded. However, where meals and drinks make up an integral and inseparable part of contributions to the cost of events or sponsoring as part of Sponsorship Agreements with HCOs, they have been included in Contributions to Cost of Events.

Informational and Educational Materials

Items for HCPs information and patient educational material are excluded, and not disclosed within this report.

Logistical costs

Logistical costs related to Valneva Organised Meetings (for example, room hire, technicians, personnel) are excluded. However, ToVs to participants, such as support for travel and accommodation or speaker fees to HCPs are included in the relevant cost category.

Donations to charitable organisations & Patient Organisations

All ToVs to non-HCO organisations are out of scope and excluded for example, charitable organisations. All ToVs to Patient Organisations are out of scope in this report as separate reporting requirements provide transparency on ToVs to these organisations and included on

Valneva website. These requirements are outlined in the ABPI Code of Practice on Relationships between the Pharmaceutical Industry and Patient Organisations.

2.4 ToVs date

Where the ToV is a payment, values are reported in the year of the payment (between 01 January and 31 December)

A ToV will be disclosed when the transfer is complete (e.g. when the total amount is to be paid is complete or the benefit received is complete).

If consent to disclose these has been obtained, they are reported against the individual. If not, they are reported in aggregate. Where ToVs relate to multi-year contracts, only the ToVs made in the reporting year are included.

Where the ToV is a benefit in kind, generally the values are reported in the reporting year the recipient received the benefit.

2.5 Direct ToVs

The legal person that holds the bank account on which the money is transferred is considered the recipient of the ToV and will be disclosed. The exception to this is that if an HCP has directed that a payment under a fee for services contract should be paid to a company where that HCP is the sole shareholder then the ToV will be recorded against that HCP and not the company. Direct ToVs are captured in Valneva Finance system and are transferred into the transparency reporting document. Each function in the UK will report their own ToVs and this is collated into one reporting spreadsheet. They are then mapped to the appropriate ABPI Code disclosure activity category for reporting.

2.6 Indirect ToVs

Where third parties are appointed by an HCO to manage an event, and where the HCO ultimately benefits from that ToV, these ToVs are disclosed against the HCO. Where an event is organised on behalf of multiple HCOs without clarity on allocation, the value is divided equally between the HCOs.

Where third parties are appointed by Valneva to provide services in the form of Donations which are benefits in kind provided to HCOs for the purpose of supporting healthcare, the value of the completed service specifically provided to that HCO is tracked and recorded against the recipient HCO.

Where third parties are appointed by Valneva to make travel and accommodation arrangements for HCPs who are providing services or who are supported to attend events, these ToVs are disclosed against the HCP.

Any additional administration fees charged by agencies are not included, as these are not ToVs to HCPs or HCOs.

Where ToVs are made to an individual HCP indirectly via an HCO and where Valneva has obtained the consent, these will be disclosed against the HCP in line with local association guidelines.

2.7 Non-monetary ToVs

Disclosure of non-monetary transfers of value is made at the equivalent value in monetary terms.

2.8 ToVs in case of partial attendances or cancellation and refund

Where an HCP/HCO does not receive the benefit due to a no show or a cancellation of event, the associated costs are not reported, such as the cost of cancelling a hotel booking or accommodation. In case of partial attendance, only the benefits actually received are reported.

2.9 Cross-border activities

Valneva employees are required to capture and report all ToVs to HCPs and HCOs with their primary practice in a country with EFPIA Code of Practice and/or other cross border transparency reporting requirements. The country of disclosure will be determined by the address of principal practice for HCPs and the address of registration for an HCO

2.10 R&D

Valneva will disclose ToV to HCPs or HCOs as per the Code; related to the planning or conduct of:

- Non-clinical studies - Clinical trials
- Non-interventional studies - that are prospective in nature and that involve the collection of patient data from or on behalf of individual, or groups of, HCPs specifically for the study
- Valneva UK has no R&D disclosures.

2.11 Voluntary disclosure

Valneva UK only provide ToVs that are required by the code. There are no voluntary ToVs.

3 Specific considerations

3.1 Country unique identifier

Valneva has a unique identifier in their own customer reporting management tool for all HCPs or HCOs to ensure that transactions are reported against the correct recipient to facilitate collection of ToVs throughout Europe and across other affiliates.

3.2 Self-incorporated HCP

Where an HCP has set up their own company and they are the sole owner and Valneva has made payments to that company for Services provided by the HCP, the ToVs have been disclosed against that individual HCP

3.3 Multi-year agreements

Where projects run for several years, the Company will declare the payment amount relevant to the year in which each part of the payment was made. Thus a project which

spans 2 calendar years and includes several individual Transfers of Value during that time will have two associated disclosures; one for each calendar year showing the value of the transfer made in that specific calendar year.

3.4 Country specificities

Valneva follows the ABPI Code of Practice and the EFPIA Disclosure Code, but applies additional UK-specific rules, including:

- Disclosure of ToVs to Other Relevant Decision Makers (ORDMs), which is a UK-specific category not used in all EFPIA countries.
- UK-based recipients are disclosed even if the activity occurred outside the UK.
- UK reporting requires named disclosure unless consent is withheld, whereas some countries mandate named disclosure without consent.
- Valneva UK does not have any collaborative working with other companies

3.5 Quality Checks

Prior to reporting, Valneva internal processes ensure that ToVs made to HCPs, ORDMs, HCOs and POs are accurately collected in Valneva. Data quality checks are performed to ensure that any HCP who has objected to disclosure are reported in 'aggregate' and additional data and process monitoring takes place for quality assurance prior to reporting.

Validation steps included:

- Cross-checking finance records with CRM entries
- Reviewing contracts and invoices
- Confirming event attendance
- Internal audit review
- Country management sign-off prior to publication

Discrepancies were resolved through reconciliation with finance and medical teams. Each individual department are asked for their ToVs.

4 Data protection legal basis

4.1 Consent collection

HCO consent In United Kingdom of Great Britain & Northern Ireland HCOs are reported without the need for consent as they are legal entities.

HCP consent

All efforts have been made to achieve a high level of individual HCP payment disclosure whilst recognising the UK Data Act and the General Data Protection Regulation (GDPR). Each contract has this stated in the contract.

Management of recipient consent withdrawal Where HCPs exercise their right under the Data Protection Act or under the General Data Protection Regulation (GDPR) to object to individual disclosure, Valneva will make an attempt to encourage the HCPs to remain in

individual disclosure. If an individual still chooses to opt out of public disclosures, such ToVs will be reported in aggregate.

Management of recipient's requests

As the UK disclosure data will be hosted on the ABPI central platform, HCPs/HCOs or ORDMs should in the first case raise queries or requests with the ABPI data Partner. If data queried by an HCP/ORDM has already been published on the public search, it will be immediately suppressed in the system and will disappear from publication until the query is resolved. HCP/ORDMs will continue to see the queried data within their private Disclosure Portal even if it is under query. Any data queried by HCOs will remain published.

4.2 Legitimate interests

Valneva do not currently use Legitimate interests

5 Form of disclosure

5.1 Date of publication

The date of publication for United Kingdom of Great Britain & Northern Ireland is 30 June 2026 in line with the ABPI Code of Practice for the Pharmaceutical Industry.

5.2 Disclosure platform

Disclosure UK portal for HCP/HCOs at 'Disclosure UK – www.disclosureuk.org.uk' and for POs, Valneva's own website

5.3 Disclosure language

Disclosure is made in English

6 Disclosure financial data

6.1 Currency

Disclosure will be made in British Pounds GBP. For ToVs made in foreign currencies, the conversion was made at the time of reporting using our standard currency accounting rates.

6.2 VAT included or excluded

Countries can disclose the net amount or the gross amount.

ABPI: Where possible, the Net amount is disclosed. If VAT cannot accurately be excluded, the Gross amount is disclosed.

6.3 Calculation rules

All Transfers of Value (ToVs) are reported at the actual cost to the company.

Where exact values are not available, the best reasonable estimate is used, supported by internal documentation.

ToVs are recorded on the date the cost was incurred not the date of payment and they fall in the year 1st Jan 2025 to 31st Dec 2025

7 Additional Information

Disclosure of ToVs provided to Patient Organisations and Members of the Public

Disclosure of ToVs provided to Patient Organisations

Valneva is committed to ensuring transparency in its relationship with Patient Organisations and will, in accordance with the EFPIA Code of Practice and the ABPI Code of Practice, make publicly available any ToVs and non-financial support provided by Valneva to Patient Organisations in countries with disclosure requirements.

The EFPIA Disclosure Code requires all EFPIA member companies to disclose a list of patient organisations to which it has provided financial support and/or significant indirect/non-financial support or with whom it has engaged to provide contracted services for that Member Company. This disclosure must include a description of the nature of the support or services provided that is sufficiently complete to enable the average reader to form an understanding of the nature of the support or the arrangement without the necessity to divulge confidential information.

The ABPI has translated the requirements of the EFPIA Disclosure Code

which state that:

Companies must make publicly available annually, a list of patient organisations to which it provides donations, grants, or sponsorship (including in relation to events/meetings) or with whom it has engaged to provide contracted services over the reporting period. This information must be disclosed on the company website either on a national or European level. Each reporting period shall cover a full calendar year. Each company must include a note of methodologies used by it in preparing the disclosures and identifying support and contracted services provided.

The disclosure for the provision of donations, grants, or sponsorship (including in relation to events/meetings) to a patient organization must include:

- the monetary value of each financial contribution (grant or sponsorship) to include a description that is sufficiently complete to enable the reader to understand the nature of that support or the arrangements
- the monetary value for each non-financial and/or indirect support (donation); the published information must also include a clear description of each donation that is sufficiently complete to enable the reader to understand the nature of the support or the arrangements. If the non-financial and/or indirect support (donation) cannot be assigned a meaningful monetary value, the published information must describe clearly the non-monetary value that the organization receives that is sufficiently complete to enable the reader to understand the nature of the support or the arrangements.

The disclosure for contracted services provided by each patient organization, must include:

- the total amount paid per patient organization per calendar year including a description of the services provided that is sufficiently complete to enable the reader to understand the nature of the services provided without the necessity to divulge confidential information
- fees and expenses should be disclosed separately.

The disclosure of ToVs and non-financial support provided to Patient Organisations by Valneva also includes ToVs made by Valneva to individual patients (e.g., for speaker services) who are acting on behalf of a Patient Organization as representatives of the Patient Organization.

In accordance with the Valneva process, the Healthcare Compliance Representative in the country of the Patient Organisation is responsible for preparing the disclosure report with the Direct and Indirect ToVs provided to Patient Organisations from his/her country and disclosing such ToVs in accordance with local disclosure requirements.

Disclosure of ToVs provided to Members of the Public, including Patients and Journalists

Valneva is committed to ensuring transparency of Transfers of Value (ToV) provided to Members of the Public, including patients and journalists, as required by the ABPI Code of Practice.

The ABPI Code states that:

Companies must make publicly available annually details of the fees for certain contracted services paid to members of the UK public, including patients and journalists. These services include speaking at meetings, assistance with training, writing articles and/or publications, 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. T

The disclosure for contracted services provided by members of the public, must include:

- the total number of members of the public, including patients and journalists contracted to perform services and the total amount paid per calendar year, and a description of the types of services provided that is sufficiently complete to enable the reader to understand the nature of the services provided without the necessity to divulge confidential information
- Companies should provide a breakdown of the total payments to each group of individuals, i.e. the public, patients and journalists without the necessity to divulge confidential information
- Fees and expenses should be disclosed separately.
- Each company must include a note summarising the methodologies used by it in preparing the disclosures and identifying support and services provided.

In accordance with the Valneva's process, the Healthcare Compliance Person in the UK is responsible for preparing the disclosure report with fees and expenses for certain contracted services paid to Members of the Public, including patients and journalists in accordance with local disclosure requirements.

Disclosure Report for Patient Organisations and Members of the Public

A template for Disclosure of ToVs to Patient Organizations and Members of the Public, including Patients and Journalists, will be used by Valneva which has been provided by APBI.

The UK Valneva Patient Organisation and Members of the Public Disclosure Report will be disclosed on the UK Valneva company website.

The 2025 Valneva Patient Organisation and Members of the Public Disclosure Report covers ToVs made between 1st January 2025 and 31st December 2025. The disclosed amounts are exclusive of VAT where possible.