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Bial Pharma UK Ltd: Methodological note for HCP/ORDM/HCO disclosure 2024

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1 Definitions

1.1 Recipients

Recipients include Healthcare Professionals (HCPs), Healthcare Organisations (HCOs), and Other Relevant Decision Makers (ORDMs).

HCPs include members of the medical, dental, pharmacy and nursing professions and any other persons who may administer, prescribe, purchase, recommend, influence or supply the use of medicines.

HCOs include any healthcare, medical or scientific organisation such as a hospital, clinic, foundation, university or other teaching institution or learned society, or any legal entity through which one or more HCPs or ORDMs provide services.

ORDMs include individuals, particularly those with a role within the NHS, who may influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply or any use of any medicine but who are not HCPs.

1.2 Kind of ToVs

Transfers of Value (ToVs) include direct and indirect payments or benefits in cash or in kind made in connection with the development or sale of medicines.

For HCPs/ORDMs:

- Fees for service and consultancy
- Related expenses (travel, accommodation, parking)
- Registration costs for congress attendance

For HCOs:

- Sponsorship agreements

2 Disclosure's Scope

2.1 Products concerned

Disclosures cover medicinal products for human use marketed by Bial Pharma UK Ltd.

2.2 Company concerned

This disclosure relates solely to Bial Pharma UK Ltd, a wholly owned subsidiary of Bial Portela & C^a, S.A.

2.3 Excluded ToVs

Transfers not covered by the ABPI Code are excluded.

Food and drink are excluded unless specifically funded as part of sponsorship, in which case they are disclosed.

2.4 ToVs date

Transfers of value are disclosed based on the date of payment.

2.5 Direct ToVs

Direct ToVs are made directly to an HCP, ORDM or HCO.

2.6 Indirect ToVs

Indirect ToVs are made via third parties.

Where the ultimate beneficiary can be identified, the ToV is disclosed against that recipient. Otherwise, it is disclosed at the level of the contracting organisation.

2.7 Non-monetary ToVs

Non-monetary ToVs are disclosed at their monetary value.

2.8 ToVs in case of partial attendances or cancellation and refund

Unrecoverable costs are disclosed where attributable to the recipient.

Refunds are deducted where applicable.

2.9 Cross-border activities

All cross-border ToVs to UK recipients are included and internally reviewed.

2.10 R&D

R&D ToVs are disclosed in aggregate.

Where applicable, Investigator-initiated studies are disclosed under the relevant HCO.

2.11 Voluntary disclosure

No additional voluntary disclosures are made.

3 Specific considerations

3.1 Country unique identifier

Recipient data is validated using internal systems and IQVIA OneKey.

3.2 Self-incorporated HCP

ToVs are disclosed according to the contracting legal entity.

3.3 Multi-year agreements

ToVs are disclosed in the year of payment.

3.4 Country specificities

This disclosure follows UK ABPI requirements.

3.5 Quality Checks

Data is validated, reconciled, and reviewed internally.

4 Data protection legal basis

4.1 Consent collection

Consent is collected per engagement.

Non-consenting HCPs are disclosed in aggregate with recipient counts.

4.2 Legitimate interests

Legitimate interest is not used for HCP disclosure in 2025.

5 Form of disclosure

5.1 Date of publication

Published annually in line with ABPI timelines.

5.2 Disclosure platform

Published on the company website.

5.3 Disclosure language

English.

6 Disclosure financial data

6.1 Currency

All values are in GBP (£).

6.2 VAT included or excluded

ToVs are disclosed exclusive of VAT, except where VAT is irrecoverable or included in invoiced amounts.

VAT has been included where applicable based on recipient status.

6.3 Calculation rules

Euro amounts converted using exchange rate at payment date.

Values aggregated per recipient and category.

7 Additional Information

Bial Pharma UK Ltd is committed to transparency in its interactions with healthcare stakeholders and ensuring compliance with applicable codes and regulations.

Magarete Ruiz

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Bial Pharma UK Ltd