



A. MENARINI  
FARMACEUTICA  
INTERNAZIONALE SRL

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# A. Menarini Farmaceutica Internazionale SRL Methodological note for HCP/ORDM/HCO disclosure 2025

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In collecting and preparing the information to be used in the submission of Transfers of Value (ToV) to Health Care Professional's (HCP's), Other Relevant Decision makers (ORDM's) and Health Care Organisations (HCO's), A. Menarini Farmaceutica Internazionale Srl ("Menarini") set up the following processes in order to ensure a robust, accurate and up to date system was developed.

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# 1 Definitions

## 1.1 Recipients

This methodological note only applies to Recipients based in the United Kingdom (UK). For the purposes of the application of this methodological note, the UK includes the Channel Islands and the Isle of Man.

Healthcare 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. The term also includes any employee of a pharmaceutical company whose primary occupation is that of a practising health professional.

‘Other relevant decision maker’ (“ORDM”) particularly 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 an HCP.

‘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 or an organisation through which one or more HCPs or ORDMs provide services. If an HCO consists of only one HCP or ORDM, then it would be disclosed in line with the approach for individual HCPs or ORDMs.

‘Patient organisation’ means an organisation mainly comprised of patients and/or caregivers or any user organisation such as a disability organisation, carer or relative organisation and consumer organisation that represents and/or supports the needs of patients and/or caregivers.

ToV made to retired HCPs/ORDMs are generally excluded from disclosure unless they are continuing to provide contracted services in a professional capacity. In the event that Menarini is notified of an HCP/ORDM passing away after receiving a Transfer of Value but

before the disclosure date, Menarini UK will report the ToV on an aggregate basis to respect the privacy of the deceased.

## 1.2 Kind of ToVs

**‘Sponsorship’** means a contribution, financial or otherwise, in whole or in part provided by or on behalf of a company, towards an activity (including an event/meeting or material) performed, organised, created, etc. by an HCO, patient organisation or other independent organisation.

**‘Research and development transfers of value’** means, for the purposes of disclosure, ToV to HCPs or HCOs related to the planning or conduct of:

- i. non-clinical studies (as defined in the OECD Principles of 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 individual or groups of health professionals specifically for the study.

**‘Donations and grants’** collectively mean providing 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. Donations and grants to individuals are prohibited.

In general, donations are physical items, services or benefits-in-kind which may be offered or requested. Grants are the provision of funds.

**‘Contribution to costs related to events’** in relation to the disclosure of ToV means providing or covering the costs of travel, accommodation and/or registration fees to support the attendance of an individual to an event organised or created by a company and/ or independent organisation. When providing sponsorship of events/ meetings to organisations, associations, etc. such contributions may include costs for subsistence (food and drink). A company can provide support for individual HCPs or ORDMs to attend events/meetings.

**‘Support’** in this context is the provision of a financial contribution, in whole or in part, whether paid directly or indirectly to individual HCPs or ORDMs to attend events/meetings.

**‘Collaborative working’** refers to pharmaceutical companies working with other organisations to deliver initiatives which either enhance patient care or are for the benefit of patients or alternatively benefit the National Health Service (NHS) and, as a minimum, maintain patient care. Further details are given in Clause 20 of the 2024 ABPI Code.

**‘Transfer of value’ (“ToV”)** 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. A direct ToV is one made directly by a company for the benefit of a recipient. An indirect ToV 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 ToV.

**‘Fees for Contracted Services’** relates to the fees that Recipients are paid when they are contracted by pharmaceutical companies to act as consultants and advisors, whether in groups or individually, for services such as speaking at and chairing meetings, involvement

in medical/scientific studies, clinical trials or training services, writing articles and/or publications, participation at advisory board meetings, and participation in market research where such participation may involve remuneration and/or hospitality.

## 2 Disclosure's Scope

### 2.1 Products concerned

This methodological note covers ToV made in relation to Menarini's activity relating to UK Prescription Only Medicines (POMs)

### 2.2 Company concerned

A. Menarini Farmaceutica Internazionale SRL ("Menarini")

### 2.3 Excluded ToVs

The following are not ToV for the purposes of the 2024 ABPI Code:

- ToV that are solely related to OTC medicines
- Ordinary course purchases and sales of medicines by and between a company and an HCP or an HCO
- Samples of medicines provided in accordance with Clause 21 of the 2024 ABPI Code
- ToV provided in accordance with Clauses 10.5, 10.6 and 19.2 of the 2024 ABPI Code. This includes inexpensive pens, pencils and notepads provided to attendees of company organised events/ meetings or provided in conference bags at independently organised meetings. It also includes inexpensive items for patient support.
- Subsistence provided to HCPs and ORDMs in relating to meetings and events held or supported by pharmaceutical companies.

### 2.4 ToVs date

Payments made to Recipients between 1<sup>st</sup> January 2025 and 31<sup>st</sup> December 2025. ToV are disclosed based on the date the payment was cleared by Menarini's financial systems, rather than the date the activity occurred or the date the invoice was received.

### 2.5 Direct ToVs

A Direct ToV is one made directly by Menarini Group for the benefit of a Recipient (e.g. HCP, ORDM or HCO).

*Example:* A consultancy fee paid directly into an HCP's bank account by Menarini Group, or the direct purchase of a flight by Menarini UK for an HCP attending an educational meeting.

### 2.6 Indirect ToVs

An Indirect ToV is one made by a third party (such as a medical education agency, event organiser, or travel management company) on behalf of Menarini for the benefit of a Recipient, where Menarini knows or can identify the recipient that will ultimately benefit from the ToV.

*Example:* Menarini sponsors a medical society's congress, and the medical society uses a portion of those funds to cover the travel and accommodation of a specific HCP, whose identity is known to Menarini

## **2.7 Non-monetary ToVs**

Where Menarini provides a non-monetary ToV (an "in-kind" ToV), the value disclosed is the actual financial cost incurred by the company to provide that ToV.

## **2.8 ToVs in case of partial attendances or cancellation and refund**

If an event or ToV is cancelled and the recipient does not receive any benefit, no ToV is disclosed. If an HCP or ORDM partially attends an event, only the actual costs incurred and utilised by that individual (e.g., the specific nights of accommodation used) are disclosed. Cancellation fees paid to suppliers where the HCP received no benefit are not disclosed.

## **2.9 Cross-border activities**

This disclosure includes ToVs made to UK-based Recipients by Menarini's overseas affiliates. ToVs are disclosed in the country where the Recipient has their primary physical or professional address, regardless of which Menarini entity funded or organized the activity.

## **2.10 R&D**

Research and development transfers of value' are disclosed as an aggregate figure rather than being disclosed against individual Recipients.

## **2.11 Voluntary disclosure**

Menarini does not currently voluntarily disclose ToVs outside of the mandatory requirements set out by the 2024 ABPI Code

# **3 Specific considerations**

## **3.1 Country unique identifier**

Menarini utilises both an internal and a proprietary commercial database to identify unique Recipients, from which the name and business address are taken for disclosure. If a Recipient cannot be found in the proprietary commercial database Menarini will capture the required information for disclosure in its own database.

## **3.2 Self-incorporated HCP**

Where an HCP provides services through a self-incorporated personal company (e.g., a Limited Company) and this is identified by Menarini, then the ToV is disclosed in line with the approach for individual HCPs.

## **3.3 Multi-year agreements**

Where a contract covers a multi-year period, Menarini discloses the ToVs in the specific calendar year in which the actual payment or benefit was transferred to the Recipient, rather than dividing the total contract value pro-rata across the years.

## **3.4 Country specificities**

Menarini discloses in line with the 2024 ABPI Code.

## **3.5 Quality Checks**

Menarini performs Quality Checks on data before publishing. Payments from Menarini's ERP are cross-checked against approved activities and vice versa to ensure the reports are accurate and comprehensive.

## 4 Data protection legal basis

### 4.1 Consent collection

Menarini relies on consent as the legal basis for disclosing personal data. Recipients are provided with a clear opportunity to consent to individual disclosure. If consent is denied or withdrawn, the ToV is disclosed on an aggregate basis

- For each activity, consent is requested at the inception of an HCP agreeing to provide services for the organisation. This consent form is stored electronically on a password protected network to ensure data protection is maintained whilst allowing review of records if required in future.
- Should an HCP provide consent for one ToV but decline consent for another, all interactions will be included in the aggregate value. No partial disclosures will be made.
- All ToV without consent to disclose are included in an aggregate value for the category.

### 4.2 Legitimate interests

Menarini does not rely on Legitimate Interest as the legal basis for disclosing personal data.

## 5 Form of disclosure

### 5.1 Date of publication

Reports are published in line with the timing of ABPI Disclosure UK – on or before 30<sup>th</sup> June 2026

### 5.2 Disclosure platform

Disclosure UK – [www.disclosureuk.org.uk](http://www.disclosureuk.org.uk)

### 5.3 Disclosure language

English

## 6 Disclosure financial data

### 6.1 Currency

GBP

Any expenses received or payments made in a foreign currency have been converted at the rate of exchange ruling on the date shown on the expense claim. Where a date is not known, the average conversion rate of 2025 has been used.

### 6.2 VAT included or excluded

All values reported are the Gross values and may include VAT as relevant

### 6.3 Calculation rules

In the event that Menarini provides non-monetary ToVs, they are calculated based on the actual financial cost incurred. For the 2025 reporting period, no such ToVs were recorded.

## 7 Additional Information

Not Applicable