



Proveca Ltd.
WeWork
One St Peter's Square
Manchester
M2 3DE
Tel: +44 (0) 161 468 2627
Email: info@proveca.com
Version: 23/03/2026
Country: United Kingdom

Proveca: Methodological note for HCP/ORDM/HCO disclosure 2025

Data year: 2025

Year of publication: 2026

Contents

1	Definitions	2
1.1	Recipients	2
1.2	Kind of ToVs	2
2	Disclosure's Scope	3
2.1	Products concerned	3
2.2	Company concerned	3
2.3	Excluded ToVs	3
2.4	ToVs date	3
2.5	Direct ToVs.....	3
2.6	Indirect ToVs	3
2.7	Non-monetary ToVs	4
2.8	ToVs in case of partial attendances or cancellation and refund	4
2.9	Cross-border activities	4
2.10	R&D	4
2.11	Voluntary disclosure	4
3	Specific considerations	5
3.1	Country unique identifier	5
3.2	Self-incorporated HCP	5
3.3	Multi-year agreements	5
3.4	Country specificities	5

3.5	Quality Checks	5
4	Data protection legal basis	5
4.1	Consent collection	5
4.2	Legitimate interests	5
5	Form of disclosure	6
5.1	Date of publication	6
5.2	Disclosure platform	6
5.3	Disclosure language.....	6
6	Disclosure financial data	6
6.1	Currency	6
6.2	VAT included or excluded	6
6.3	Calculation rules.....	6
7	Additional Information	6

1 Definitions

1.1 Recipients

Proveca Ltd. engages in structured, transparent and compliant interactions with healthcare professionals (HCPs), healthcare organisations (HCOs) and patient organisations (POs). These engagements are conducted for legitimate professional and scientific purposes and enable Proveca Ltd. to obtain independent expert advice in support of the highest standards of patient care. In accordance with the ABPI Code of Practice, Proveca Ltd. defines a HCP as a member of the medical, dental, pharmacy or nursing profession or 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 transfer of values (ToVs). A HCO is defined as 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. A PO as a organisation, mainly comprised of patients and/or caregivers or any user organisations such as disability organisations, carer or relative organisations and consumer organisations that represents and/or supports the needs of patients and/or caregivers.

1.2 Kind of ToVs

Proveca Ltd. carried out the following types of engagements with the recipients defined in section 1.1.

Donations and grants are defined as 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 and services to the benefit of the pharmaceutical company in return.

Sponsorship, including contributions to costs related to events/meetings is defined as 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 a HCO, PO or other independent organisation.

Support of attendance by health professionals at events/meetings is defined as a financial contribution, in whole or in part, whether paid directly or indirectly to individuals HCPs to attend events/meetings, and is limited to travel, accommodation, subsistence and genuine registration fees in connection with a specific meeting/event.

Fees and expenses paid for contracted services to healthcare professionals include services such as speaking at and chairing meetings, involvement in medical/scientific studies, clinical trials, training services, authoring articles and/or publications, participation in advisory board meetings, and participation in market research where such participation may involve remuneration and/or hospitality. The fees for services paid by Proveca Ltd. reflect fair market value for the specific service provided. Expenses are limited to travel, subsistence, and accommodation associated with the provision of the contracted service.

Research and development transfer of value are defined as, transfers of value to HCPs or HCOs, 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.

2 Disclosure's Scope

2.1 Products concerned

Prescription only medicines (POMs).

2.2 Company concerned

Proveca Ltd.

2.3 Excluded ToVs

N/A.

2.4 ToVs date

The period covered by the disclosure submitted in 2026 started on January 1st, 2025, and ended on December 31st, 2025.

2.5 Direct ToVs

A direct ToV is defined as being made directly by a company for the benefit of a recipients. The activities conducted by Proveca Ltd. that constituted direct ToVs in this reporting period were fees for services, sponsorship and payments related to supporting HCPs to attend meetings/events.

2.6 Indirect ToVs

An indirect ToV is defined as one made by a company for the benefit of a recipient through an intermediate and where the company knows or can identify the recipient that will benefit from the ToV. The activities conducted by Proveca Ltd. that constituted indirect ToVs in this reporting period were sponsorship payments in relation to meetings/events.

2.7 Non-monetary ToVs

In the reporting period, Proveca Ltd. provided one non-monetary ToV to a PO in the form of employee time to support a PO activity. This support was provided as a benefit in kind rather than a direct financial payment. The value of this non-monetary ToV was determined in accordance with the calculation principles outlined in this methodological note. A meaningful monetary value could not be reasonably assigned to this ToV; therefore, a clear description of the support has been provided to ensure transparency and enable understanding of the nature and scope of the support provided.

2.8 ToVs in case of partial attendances or cancellation and refund

N/A.

2.9 Cross-border activities

In the reporting period, Proveca Ltd. identified ToVs arising from cross-border activities. A cross-border activity is defined as a ToV made to a recipient whose principal practice address or registered office is located in a country different from that of the disclosing company, or where the activity giving rise to the ToV took place outside of the United Kingdom. Where Proveca Ltd. made a ToV to a recipient with a principal practice address or registered office in the United Kingdom, the transfer has been disclosed via Disclosure UK, irrespective of where the event or activity took place. Where a ToV was made to a recipient whose principal practice address or registered office is located, outside the United Kingdom, the disclosure has been made in accordance with the national transparency requirements applicable in the recipient's country of practice. In such cases, disclosure is made in the country of the recipient's principal practice address, in line with local codes of practice to avoid duplication or omission.

2.10 R&D

For the purposes of this disclosure, R&D ToVs means transfers of value to HCPs or HCOs related to the planning or conduct of non-clinical studies (as defined in OECD Principles on Good Laboratory Practice), clinical trials (as defined in Directive 2001/20/EC or Regulation (EU) No. 536/2014), and non-interventional studies that are prospective in nature and involve the collection of patient data from or on behalf of HCPs or HCOs specifically for the study. Where payments are made indirectly through third parties (such as contract research organisations or study management organisations) on behalf of the company, these amounts are included within the aggregate R&D disclosure where the ultimate activity related to R&D. All R&D transfers of value as a single aggregated amount covering the reporting period and represent the total value of payments associated with R&D activities during the year. Payments categorised as R&D are excluded from the individual disclosure categories such as consultancy fees, advisory boards, sponsorship of attendance at meetings, and other service-related payments.

2.11 Voluntary disclosure

N/A.

3 Specific considerations

3.1 Country unique identifier

N/A.

3.2 Self-incorporated HCP

N/A. No HCPs contracted by Proveca Ltd. used their own Limited company.

3.3 Multi-year agreements

N/A. Proveca Ltd. have not entered into any multi-year agreements that are applicable for the disclosure period.

3.4 Country specificities

N/A.

3.5 Quality Checks

Proveca Ltd. follows an internally defined process for disclosure of ToVs relating to activities conducted in the UK and concerning UK HCPs and HCOs. The process incorporates a formal review phase involving two appropriately trained Proveca Ltd. employees. One employee is responsible for the preparation and completion of the disclosure materials in accordance with the PMCPA requirements, while the second employee independently reviews the materials to verify that the information disclosed is complete, accurate, and consistent with internal records prior to submission.

4 Data protection legal basis

4.1 Consent collection

Proveca Ltd. uses Legitimate Interests as the lawful basis to publish individual HCP information (see section 4.2 for details).

4.2 Legitimate interests

In 2022, Proveca Ltd. took the decision to move from 'Consent' to 'Legitimate Interests' as the lawful basis for the publication of individual HCPs information. By this lawful basis, HCPs are not asked for formal consent to have their data published publicly but are informed by Proveca Ltd. that their data will be published publicly as part of the disclosure of ToVs. Individuals are informed of their right to raise objections to public publication of their ToV; no objections were received by Proveca Ltd. in 2025.

5 Form of disclosure

5.1 Date of publication

30/06/2026

5.2 Disclosure platform

Disclosure UK <https://www.disclosure.org.uk>

5.3 Disclosure language

English.

6 Disclosure financial data

6.1 Currency

All ToVs are declared in GBP. Where the original payment was made in another currency, the sum was converted into GBP at the exchange rate prevailing at the time of the original payment.

6.2 VAT included or excluded

The payments made to HCOs, including research and development payments, are declared in GBP and the final disclosed values do not include VAT. The payments made to HCPs are declared in GBP, and the final disclosed values do not include VAT.

6.3 Calculation rules

Proveca Ltd. disclose non-monetary ToVs at their fair market value, representing the cost that the recipient would reasonably have incurred if the support had been purchased independently on the open market. Where it is not possible to assign a meaningful or reasonable monetary value to the support provided, Proveca Ltd. discloses a clear and sufficiently detailed description of the non-monetary benefit to ensure transparency and to enable the reader to understand the nature, scope and purpose of the support, in line with the ABPI Code requirements.

7 Additional Information

N/A.