

# HCP/HCO Methodological Note Template

The logo for Accord, featuring the word "accord" in a white, lowercase, sans-serif font centered within an orange rectangular background.

Version: 01 Updated for 2025 disclosure

Country: UK

## Accord UK LTD Methodological note for HCP/ORDM/HCO disclosure 2025

Data year: 2025

Year of publication: 2026

Accord-UK Ltd engages Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs) to seek valuable, independent and expert knowledge. This is important to ensure we are continually aiming to improve the quality of patient care. In-line with the ABPI code, Accord-UK Ltd will compensate them for their services.

As well as services, Accord-UK Ltd may also provide grants and donations to HCOs in response to unsolicited requests to support programmes that target unmet needs and patient care. Accord-UK Ltd also provides sponsorships to HCOs for educational events and conferences, as well as supporting the continuing medical education of HCPs by covering the costs of their fees, travel and accommodation to attend educational events. This sponsorship helps ensure that HCPs are kept up to date with their knowledge.

The ABPI (Association of the British Pharmaceutical Industry) Code of Practice requires member companies to publish a note summarising the method used by the company in preparing its Disclosure Report and identifying transfers of value for each category of spend relating to HCPs and HCOs ("Methodology Note"). Disclosure for the UK also incorporates payments made by other Accord affiliates to UK-based HCPs and HCOs.

This document represents Accord-UK Ltd's Methodology Note for the reporting period 1<sup>st</sup> January 2025 to 31<sup>st</sup> December 2025.

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# 1 Definitions

## 1.1 Recipients

Recipients include all Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs), and Healthcare Organisations (HCOs) who receive a Transfer of Value (ToV) from Accord UK Ltd or any Accord affiliate. This includes individuals or organisations engaged for consultancy, advisory boards, speaking, training, research, or educational activities. HCPs are defined in line with the ABPI Code as any member of the medical, dental, pharmacy, or nursing professions, or any person who may prescribe, purchase, supply, recommend, or administer a medicinal product.

## 1.2 Kind of ToVs

Transfers of Value include all direct and indirect payments or benefits provided to HCPs/HCOs, such as:

- Fees for services and consultancy
- Sponsorship of attendance at educational events
- Grants and donations to HCOs
- Travel and accommodation
- Registration fees
- Research and development payments

# 2 Disclosure's Scope

## 2.1 Products concerned

Disclosure covers all prescription-only medicines marketed by Accord UK Ltd.

## 2.2 Company concerned

The report includes ToVs made by Accord UK Ltd and any Accord affiliates to UK based HCPs and HCOs.

## 2.3 Excluded ToVs

Excluded ToVs includes any payment related non-prescription medicines and Payments to patients or patient organisations which are reported separately.

## 2.4 ToVs date

ToVs are reported based on the date the value is transferred, not the date of invoice or contract signature. For services, the payment date is used; for events, the date the event occurs.

## 2.5 Direct ToVs

Direct ToVs are payments made directly by Accord UK Ltd to the HCP/HCO, such as consultancy fees or direct reimbursement of travel expenses.

## 2.6 Indirect ToVs

Indirect ToVs are payments made through third parties (e.g., event organisers, medical education agencies) where the beneficiary is known and identifiable.

## **2.7 Non-monetary ToVs**

Non-monetary ToVs include benefits such as paid travel, accommodation, registration fees, or educational materials provided as part of sponsorship.

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

If an HCP cancels attendance and a refund is issued, no ToV is disclosed. If partial attendance occurs, only the proportion of costs actually incurred is disclosed.

## **2.9 Cross-border activities**

Where a UK based HCP/HCO receives a ToV from an Accord affiliate outside the UK, the payment is disclosed in the UK report, consistent with EFPIA and ABPI requirements.

## **2.10 R&D**

Research and Development ToVs include payments related to clinical trials, non-interventional studies, and prospective observational research. These are disclosed in aggregate, as required by the ABPI Code.

## **2.11 Voluntary disclosure**

Any ToVs not strictly required by the ABPI Code but disclosed for transparency are included and clearly identified as voluntary.

# **3 Specific considerations**

## **3.1 Country unique identifier**

All data submitted is matched by the ABPI's third party database provider.

## **3.2 Self-incorporated HCP**

Where an HCP operates through a limited company, ToVs are disclosed under the HCP's name, not the company name, in line with ABPI guidance.

## **3.3 Multi-year agreements**

For multi-year contracts, only the ToVs paid within the reporting year (1 January–31 December 2025) are disclosed, regardless of the contract duration.

## **3.4 Country specificities**

The UK follows ABPI Code requirements, including individual disclosure where consent is obtained. Where consent is not granted, ToVs are disclosed in aggregate.

## **3.5 Quality Checks**

Accord UK Ltd performs internal validation, crosschecks with finance systems, and reconciliation with third party data to ensure accuracy. Any discrepancies are investigated before publication.

# **4 Data protection legal basis**

## **4.1 Consent collection**

Consent is requested from HCPs for individual disclosure of ToVs. If consent is not granted, the ToV is disclosed in aggregate. Consent is collected in accordance with GDPR and ABPI guidance.

## **4.2 Legitimate interests**

Where consent is not required (e.g., HCO disclosures), processing is based on Accord UK Ltd's legitimate interest in complying with industry transparency standards.

## **5 Form of disclosure**

### **5.1 Date of publication**

The disclosure report will be published in 2026, covering ToVs made in 2025, as stated in the document.

### **5.2 Disclosure platform**

The report is published on the ABPI Disclosure UK platform, the central UK database for HCP/HCO transparency reporting.

### **5.3 Disclosure language**

The disclosure is published in English.

## **6 Disclosure financial data**

### **6.1 Currency**

All ToVs are reported in GBP (£). Payments made in other currencies are converted to GBP using the exchange rate on the date of payment.

### **6.2 VAT included or excluded**

Fees for services are reported exclusive of VAT. Travel, accommodation, and registration fees are reported inclusive of VAT where applicable.

### **6.3 Calculation rules**

- Travel costs include actual amounts paid (e.g., flights, trains, taxis).
- Accommodation costs reflect the nightly rate paid.
- Registration fees reflect the full cost of attendance.
- For partial attendance, only the proportion of costs incurred is disclosed.

## **7 Additional Information**

Any clarifications, assumptions, or methodological updates specific to the 2025 reporting cycle will be included here. Accord UK Ltd may update this methodology in future years to reflect changes in ABPI guidance or internal processes.