

# Indivior UK Limited: Methodological note for HCP/ORDM/HCO disclosure [2025]

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The Company (Indivior UK Limited) will disclose all Transfers of Value to healthcare professionals and healthcare organisations in accordance with its commitment to the Code of Practice of the Association of the British Pharmaceutical Industry (ABPI) and the European Federation of Pharmaceutical Industries and Associations (EFPIA). This document summarises the approach taken in calculating the figures disclosed.

## Contents

|          |  |          |
|----------|--|----------|
| <b>1</b> | <b>Definitions</b> .....   | <b>2</b> |
| 1.1      | Recipients .....   | 2        |
| 1.2      | Kind of ToVs .....   | 2        |
| <b>2</b> | <b>Disclosure's Scope</b> .....                                      | <b>3</b> |
| 2.1      | Products concerned .....   | 3        |
| 2.2      | Company concerned .....  | 3        |
| 2.3      | Excluded ToVs .....  | 3        |
| 2.4      | ToVs date .....  | 3        |
| 2.5      | Direct ToVs .....  | 4        |
| 2.6      | Indirect ToVs .....  | 4        |
| 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 .....   | 5        |
| <b>3</b> | <b>Specific considerations</b> .....                                 | <b>5</b> |
| 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   | <b>Data protection legal basis</b> ..... | 6 |
| 4.1 | Consent collection.....                  | 6 |
| 4.2 | Legitimate interests .....               | 6 |
| 5   | <b>Form of disclosure</b> .....          | 6 |
| 5.1 | Date of publication .....                | 6 |
| 5.2 | Disclosure platform .....                | 6 |
| 5.3 | Disclosure language.....                 | 6 |
| 6   | <b>Disclosure financial data</b> .....   | 6 |
| 6.1 | Currency .....                           | 6 |
| 6.2 | VAT included or excluded.....            | 6 |
| 6.3 | Calculation rules.....                   | 6 |
| 7   | <b>Additional Information</b> .....      | 7 |

# 1 Definitions

## 1.1 Recipients

- **Healthcare Organisation (HCO):** A healthcare, medical or scientific association or organisation (e.g., 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 the United Kingdom; or an organisation through which one or more HCPs or ORDMs provide services. This can also include a self-incorporated company set up by an HCP where the recipient is not the sole director of the company.

- **Healthcare Professional (HCP):** A member of the medical, dental, pharmacy or nursing professions or any other person who, in the course of his/her professional activities, may prescribe, purchase, supply, recommend or administer a medicinal product and whose primary practice, principal professional address or place of incorporation is in the UK. Employees whose primary occupation is that of a practicing health professional are also included. In the UK, HCP includes 'other relevant decision makers' (ORDM).

**NOTE:** If an HCP has set up a private company, as a sole-director, they will be considered an HCP for the purposes of disclosure.

- **Transfer of Value (ToVs):** Direct and indirect transfers of value (in payments or kind or otherwise made) in connection with the development or sale of prescription-only medicinal products for human use whether for promotional services or otherwise.

## 1.2 Kind of ToVs

Transfers of value are categorised and disclosed in accordance with the ABPI Code of Practice. The company discloses the following types of ToVs:

Congress and educational event registration fees: ToVs related to the registration of an HCP to attend a congress or educational event.

Travel and accommodation relating to congress or educational event: ToVs related to travel and accommodation provided in relation to an HCP's attendance at a congress or educational event (e.g., travel including flights, taxi or train, and accommodation).

Fees for Service: ToVs resulting from or related to a fee for service contract where an HCP or HCO provides services to the Company (e.g., advisory board services, speaker services or consulting services).

Related expenses to the fee for service contract: ToVs directly related to a fee for service contract (e.g., travel including flights, taxi or train, and accommodation).

Additional categories of Transfers of Value include those provided to Healthcare Organisations, such as donations and grants, sponsorship agreements, and fees for services, in line with the ABPI Code.

Transfers of Value related to Research and Development activities are disclosed in accordance with the ABPI Code, with further detail provided in Section 2.10.

## **2 Disclosure's Scope**

### **2.1 Products concerned**

The disclosure includes Transfers of Value related to prescription-only medicine for human use in accordance with ABPI Code of Practice.

### **2.2 Company concerned**

This disclosure relates to Transfers of Value made by Indivior UK Limited.

### **2.3 Excluded ToVs**

This disclosure excludes Transfers of Value that fall outside the scope of the ABPI Code.

### **2.4 ToVs date**

Disclosures are made annually. Transfers of Value for the previous calendar year (01 Jan – 31 Dec) will be made publicly available within the first six months after the end of the calendar year in which the ToV was received.

There is an inevitable delay between the date on which a payment is approved within the Company and the date on which the payment may be made.

For fee for service consultancy ToVs and expenses costs which are reimbursed directly to HCPs, the Company will disclose the details against the calendar year in which the payment was made.

For HCP travel, accommodation and expenses (e.g. transfers or registration fees) which are paid by the Company and provided to HCPs, the Company will disclose the details against the calendar year in which the expense ToV was received by the HCP.

For collaborative working, donations and grants and contribution to the cost of events, the Company will disclose the details against the calendar year in which the payment was made, or the services were provided.

## 2.5 Direct ToVs

Direct Transfers of Value are payments made directly by the Company to healthcare professionals or healthcare organisations such as:

- Fees for service paid directly to the healthcare professional or healthcare organisation
- Related expenses paid directly in connect with a fee for service arrangement.

## 2.6 Indirect ToVs

Indirect Transfers of Value are payments made on behalf of the Company to healthcare professionals or healthcare organisations through a third party, such as:

- Congress and educational event registration fees
- Travel and accommodation in relation to a congress or educational event

## 2.7 Non-monetary ToVs

Non-monetary Transfers of Value include benefits in kind provided to healthcare professionals and healthcare organisations such as:

- Travel and accommodation provided in kind

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

In the case of partial attendances, cancellations or refunds, the Company discloses the value of the benefit ultimately provided.

## 2.9 Cross-border activities

[The company works with relevant internal stakeholders to identify activities involving UK HCPs that occur outside the United Kingdom and gathers the necessary information to support disclosure.

## 2.10 R&D

- **[Research and Development (R&D):** HCP/HCO ToVs that relate to the planning and conduct of:
  - Non-clinical studies (as defined in OECD Principles on Good Laboratory Practice);
  - Clinical trials (as defined in Regulation 536/2014);
  - 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. This also includes investigator sponsored research (ISRs);
  - Non-interventional studies that are retrospective in nature have also been included within aggregate disclosure for R&D in this reporting year.
- All ToVs related to R&D are disclosed as aggregate figures in accordance with the ABPI and EFPIA Codes.

### **2.11 Voluntary disclosure**

The Company does not include voluntary disclosure beyond those required under the ABPI Code.

## **3 Specific considerations**

### **3.1 Country unique identifier**

The Company does not use publicly available professional identifiers for disclosure purposes.

### **3.2 Self-incorporated HCP**

Where an HCP operates through a self-incorporated company, Transfers of Value are disclosed in line with ABPI requirements. Where the HCP is a sole director, the recipient is treated as an HCP for disclosure purposes.

### **3.3 Multi-year agreements**

The Company discloses all ToVs made between 1 January and 31 December by 30 June of the following year. Where projects run for several years payments the Company will declare the amount relevant to the year in which each part of the payment was made.

Thus, a project which spans two calendar years and includes several individual ToVs 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**

N/A

### **3.5 Quality Checks**

Prior to submission, the Company performs internal quality checks to support the completeness and accuracy of the disclosure data. These checks include reviewing internal records and engaging with relevant stakeholders to confirm whether any reportable transfers of value to UK healthcare professionals or organisations occurred during the reporting period.

Where necessary, follow-up queries are conducted with relevant teams to validate the nature of the activity and confirm the appropriate categorisation and value of the transfer of value. The data is also reviewed to ensure that the information captured is consistent with the underlying activity and applicable disclosure requirements.

## **4 Data protection legal basis**

### **4.1 Consent collection**

[The Company relies on legitimate interests as the lawful basis for the disclosure of Transfers of Value to healthcare professionals in the UK in accordance with applicable data protection requirements.

HCO consent is not required to be collected in the UK.

### **4.2 Legitimate interests**

A legitimate interest assessment has been conducted to balance the Company's transparency obligations with the rights and freedoms of healthcare professionals.

Healthcare professionals have the right to object to disclosure of their personal data under legitimate interests. Where an objection is received, the Company will assess the request and determine the appropriate approach to disclosure in line with applicable requirements.

## **5 Form of disclosure**

### **5.1 Date of publication**

Disclosures are published annually no later than 30 June following the reporting period.

### **5.2 Disclosure platform**

Disclosures are published on Disclosure UK

### **5.3 Disclosure language**

Disclosures are in English

## **6 Disclosure financial data**

### **6.1 Currency**

GBP

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

The Company discloses all ToVs excluding VAT and other applicable taxes

### **6.3 Calculation rules**

Transfers of Value in currencies other than GBP are converted using the Company's monthly average foreign exchange rates.

## **7 Additional Information**

N/A