

Ethypharm UK: Methodological note for HCP/ORDM/HCO disclosure 2025 (v1 20.03.26 UK) 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	2
2.1	Products concerned	2
2.2	Company concerned	2
2.3	Excluded ToVs	2
2.4	ToVs date	2
2.5	Direct ToVs	2
2.6	Indirect ToVs	2
2.7	Non-monetary ToVs	2
2.8	ToVs in case of partial attendances or cancellation and refund	2
2.9	Cross-border activities	2
2.10	R&D	2
2.11	Voluntary disclosure	2
3	Specific considerations	2
3.1	Country unique identifier	2
3.2	Self-incorporated HCP	2
3.3	Multi-year agreements	2
3.4	Country specificities	2
3.5	Quality Checks	2
4	Data protection legal basis	3
4.1	Consent collection	3
4.2	Legitimate interests	3
5	Form of disclosure	3
5.1	Date of publication	3
5.2	Disclosure platform	3
5.3	Disclosure language	3
6	Disclosure financial data	3
6.1	Currency	3
6.2	VAT included or excluded	3
6.3	Calculation rules	3
7	Additional Information	3

Definitions

Recipients

HCPs / HCOs as detailed in the attached submission

Kind of ToVs

Grants / Sponsorships / Speaker Fees

Disclosure's Scope

Products concerned

Company concerned

Ethypharm UK Ltd

Excluded ToVs

ToVs date

January to December 2025

Direct ToVs

Per submission data

Indirect ToVs

N/A

Non-monetary ToVs

N/A

ToVs in case of partial attendances or cancellation and refund

N/A

Cross-border activities

N/A

R&D

N/A

Voluntary disclosure

Specific considerations

Country unique identifier

UK

Self-incorporated HCP

Multi-year agreements

Payments are generally one off.

Where there have been instances of HCP's providing services on a monthly basis or on a longer term contract, disclosure has been made on the basis of the amount of the payment made within the relevant year (2025) rather than the period of the contract.

Country specificities

N/A

Quality Checks

Data protection legal basis

Consent collection

Currently there is no consent to disclose clause in the letter of engagement / contract with the HCP or ORDM, therefore communication has been reviewed to identify if written consent has been obtained. The HCP or ORDM has been contacted to request consent to disclose information. Where no consent can be located or obtained or only verbal consent to disclose obtained, the amounts disclosed are made anonymously. Contacts will be reviewed for any future activities to include consent to disclose clause for each activity

Legitimate interests

N/A

Form of disclosure

Date of publication

30th June 2026

Disclosure platform

Disclosure UK

Disclosure language

English

Disclosure financial data

Currency

Submission is made in GBP.

If applicable, payments made in a foreign currency have been disclosed in GBP.

Company policy would be to review any payment and convert at the rate at the time of the payment.

VAT included or excluded

Payments were reviewed to ensure that no VAT was included in the disclosure. There were no payments to HCP's or ORDM's that included VAT.

Calculation rules

Additional Information

Payments made to private individuals are disclosed gross, it is up to the individual concerned to ensure that the correct amount of tax and national insurance is paid to HMRC

Where the HCP incurred travel or accommodation expenses the amounts disclosed have been reported separately to the speaker/training fee. There are no instances of travel or accommodation expenses in this year's submission (2025)

Commitment to transparency

The pharmaceutical industry is committed to preserving the integrity of Disclosure UK and transparency in our interactions with HCPs, ORDMs and HCOs.