

Camurus Methodological note for HCP/ORDM/HCO disclosure for 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	4
2.3	Excluded ToVs	4
2.4	ToVs date	4
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	5
2.9	Cross-border activities	5
2.10	R&D	5
2.11	Voluntary disclosure	5
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	6
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

HCPs and ORDMs

Camurus Ltd regards all employees of the NHS or any non-statutory (3rd sector) or private HCO as HCPs/ORDMs regardless of their professional status.

Payments made to HCPs are disclosed by type (see below) and reflect the total annual amount of ToV made for each category.

HCOs

Camurus Ltd regards all hospitals, General practitioner (GP) practices and other places of work for HCPs treating patients or providing associated advice or management services related to the treatment of patients as HCOs. In addition, all medical societies (national or local) and all “networks” of HCP associations are regarded as HCOs.

Payments made to HCOs are disclosed by type (see below) and reported on a per activity basis.

1.2 Kind of ToVs

Payments have been disclosed under the following ToV category types:

Donations and Grants to HCOs (Clauses 23 & 28)

On occasion, Camurus Ltd is asked by an HCO to provide a financial grant. Grants are funds given for a specific purpose without any obligations undertaken by the HCO other than to utilise the funds in accordance with the grant. Grants may include, but are not limited to support to research, patient education and independent scientific meetings and healthcare professional education. The grant is declared against the named HCO.

Camurus Ltd may offer or be requested to provide physical items, services or benefits-in-kind on the form of a donation. Donations are given with no consequent obligation on the recipient to provide a benefit to Camurus Ltd. Donations may include, but are not limited to, the provision of independent training resources to the recipient organisation. The donation is declared against the named HCO.

Camurus Ltd may, via commercial arrangements, provide associated benefits as part of the purchase price of medicines (‘package deals’) as outlined in Clause 19.1 Supplementary Information. These benefits are paid for by the recipient Healthcare Organisation via the medicine purchase price and are not, therefore, considered to be in scope of the transfers of value required by Clause 28.2.

Contribution to costs of Events (Clauses 10 & 28)

Sponsorship of meetings organised by HCOs: Camurus Ltd discloses all payments made to medical associations, HCOs, etc. in relation to support for third party meetings. This category includes funding provided via sponsorship packages with associated benefits such as brand visibility, speaking slots, etc. Where a third-party organisation is appointed by HCOs to manage an Event, the sponsorship is declared against the HCO.

Sponsorship for HCPs to attend medical meetings: Camurus Ltd supports the attendance of HCPs at medical meetings, including conferences and congresses. Camurus Ltd discloses the associated TOVs against the individual attendee. If multiple HCPs are sponsored to attend a single meeting and where costs are not individually itemised (e.g. the cost of a taxi transferring multiple HCPs from an airport to a conference venue), the total cost is split equally between all those receiving the benefit. Costs declared include registration fees, travel and accommodation.

Fees for service and consultancy, and related expenses: Camurus Ltd discloses all payments made to HCPs and ORDMs for their services provided to Camurus Ltd in the form of service and consultancy fees; any related expenses agreed in the fee for service or consultancy contract, including transport and accommodation, are disclosed as related expenses.

On occasion, an HCO may require that any services provided by its HCP employees cannot be contracted with the individual HCP but must be a service contracted through the HCO. In those instances, the full amount paid by Camurus Ltd is disclosed against the HCO as a fee for service plus any related expenses.

R&D

Research and Development (R&D) ToVs are disclosed at an aggregate level (i.e. total spend with all involved HCPs/ ORDMs/HCOs added together without specifying individuals who have been paid).

Items included:

- Pre-clinical research and clinical research (includes Investigator Sponsored Studies (ISS),
- Advisory boards and consultancy services in relation to clinical research,
- Fees for service to HCPs, ORDMs and HCOs in relation to study sites (including where these fees have been made by CRO on behalf of Camurus), and
- Travel and accommodation in relation to a fee for service contract.

Items not included:

- Overhead cost (including CRO fees), and
- Materials (such as study medication, injection kits, testing etc.).

2 Disclosure's Scope

2.1 Products concerned

Prescription-only medicines.

2.2 Company concerned

Payments made to HCPs practising in the UK or to UK-based HCOs by the Camurus UK affiliate and by Camurus overseas operations are disclosed, regardless of the source of funding.

2.3 Excluded ToVs

The following ToVs have not been disclosed:

Hospitality costs: the cost of subsistence (food & drinks) is generally not disclosed, unless it forms an integral and inseparable part of the cost of an event, e.g. sponsorship of a third-party HCO event.

Informational and educational materials: any information or educational materials provided to HCPs/ORDMs or HCOs have not been disclosed.

Clause 29: Donations to Patient Organisations - any financial support and/or any significant indirect/non-financial support made to Patient Organisations are reported separately on the Camurus company website.

Donations to charitable organisations: all ToV made to charitable organisations are outside the scope of disclosure.

Clause 30: Contracted services provided by the public, including patients and journalists. These are separately disclosed on the Camurus Ltd website along with a methodological note.

2.4 ToVs date

There is an inevitable delay between the date on which a payment is approved internally and the date on which the payment is made. Camurus Ltd discloses the details of the payment on the date the transfer of value is made. Disclosure for 2025 includes all relevant payments made in 2025.

2.5 Direct ToVs

Camurus Ltd may contract with advertising agencies and logistics agencies, etc., for services related to its business. On occasion, the work commissioned by Camurus Ltd might be contracted out to an individual HCP/ORDM. Camurus Ltd requires that all such services must be disclosed to Camurus Ltd by the contracted service agency. Where the individual HCPs/ORDMs are identifiable, Camurus Ltd discloses any payments made to those HCPs/ORDMs by the service agency as if the payments had been made directly by Camurus to those HCPs/ORDMs.

2.6 Indirect ToVs

N/A

2.7 Non-monetary ToVs

N/A

2.8 ToVs in case of partial attendances or cancellation and refund

Camurus Ltd discloses payments made for any services rendered prior to cancellation. No instances of partial attendances or refunds were recorded for 2025.

2.9 Cross-border activities

Payments made to HCPs practising in the UK or to UK-based HCOs by Camurus overseas operations are disclosed, regardless of whether the activity was provided as part of cross-border activities.

2.10 R&D

N/A

2.11 Voluntary disclosure

N/A

3 Specific considerations

3.1 Country unique identifier

N/A

3.2 Self-incorporated HCP

Where an HCP runs a private company for the purposes of their private income, any payments to that organisation is regarded, for disclosure purposes, as a payment to the HCP directly.

3.3 Multi-year agreements

Camurus discloses the details of the payment on the date the transfer of value is made and not for the full value of the contract.

3.4 Country specificities

N/A

3.5 Quality Checks

Prior to submission, data was cross-checked against two separate and independent systems used for tracking transfers of value.

4 Data protection legal basis

4.1 Consent collection

N/A

4.2 Legitimate interests

Camurus uses legitimate interest as the legal basis for processing individual HCP disclosure data.

Camurus Ltd fully supports the principles of transparency and privacy. Information disclosed must remain in the public domain for at least three years from the time of disclosure (Clause 24.5) and Camurus Ltd will document all disclosures and retain the records for at least five years after the end of the calendar year to which they relate (Clause 24.6).

5 Form of disclosure

5.1 Date of publication

31/03/2026

5.2 Disclosure platform

Disclosure UK – www.disclosureuk.org.uk

5.3 Disclosure language

English

6 Disclosure financial data

6.1 Currency

GBP

6.2 VAT included or excluded

Where payments were made and VAT was applicable, the VAT has been excluded for the purposes of disclosure. Therefore, all values provided are exclusive of VAT.

There are no other tax considerations.

6.3 Calculation rules

N/A

7 Additional Information

N/A