

Celltrion Healthcare United Kingdom Ltd. Methodological note for HCP/ORDM/HCO disclosure 2025

Data year: 2025

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Collaboration with HCPs, ORDMs, HCOs and Research Organisations

Celltrion Healthcare United Kingdom Limited (“Celltrion”) legitimately engages UK Healthcare Professionals (HCPs), other relevant decision makers (ORDMs) and Healthcare Organisations (HCOs) to provide valuable, independent, and expert knowledge derived from their clinical and management experience. This expertise makes an important contribution to our efforts to improve the quality of patient care. It is right that Celltrion compensates them for their services, and this is one of the legitimate reasons why Celltrion transfers value to HCPs, ORDMs, HCOs.

Celltrion Healthcare United Kingdom Limited is not a member of the ABPI but agrees to abide by the Code and to publish this note summarising the method used in preparing its Disclosure Report for transfers of value (ToVs) relating to HCPs, ORDMs and HCOs (and aggregated ToVs relating to Research and Development). ToVs to Patient Organisations and members of the public (including patients and journalists) are disclosed separately on the Celltrion UK Corporate website.

This document provides the methodological narrative to support the submission of our UK ABPI Disclosure Report for the year 2025.

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1 Definitions

1.1 Recipients

Healthcare Professional (HCP)

Anyone that is a member of the medical, dental, pharmacy or nursing professions and any other persons in the course of their professional activities may administer, prescribe, purchase, recommend or supply a medicine. In relation to the annual disclosure of transfers of value (Clause 28), the term also includes any employee of a pharmaceutical company whose primary occupation is that of a practising HCP.

Other Relevant Decision Makers (ORDM)

Particularly includes those with an NHS role who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply, or use of any medicine but who are not HCPs.

Healthcare Organisation (HCO)

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 HCPs or ORDMs provide services.

Retired HCPs and ORDMs

Transfers of value made to retired HCPs and ORDMs are managed and disclosed in the same manner as those made to active HCPs and ORDMs, provided the transfers meet the disclosure criteria set out in the ABPI Code.

Deceased HCPs and ORDMs

In accordance with PMCPA guidance, data protection legislation applies only to information relating to identifiable living individuals. Information relating to a deceased person does not constitute personal data and is therefore not subject to data protection legislation. It is lawful for the Company to publish details of transfers of value made to deceased HCPs or ORDMs on Disclosure UK.

The Company remains sensitive to such cases. Any requests received from next-of-kin or employers regarding published data will be handled on a case-by-case basis, balancing the Company's transparency obligations under the ABPI Code with respect and sensitivity.

Patients Organisation (PO)

An organisation mainly comprised of patients and/or caregivers or any user organisation disability organisation, carer or relative organisation and consumer organisation that represents and/or supports the needs of patients and/or caregivers.

Member of the Public

UK public not representing a patient organisation, including patients and journalists who provide certain contracted services. For example, where UK members of the public, patients or journalists participated in an Celltrion Healthcare global supported activity.

Patient: someone who is under medical care or treatment.

Journalist: Services completed by journalists for Celltrion by way of the collection, writing, editing and presentation of news or other material intended for dissemination through a range of media (TV, radio, magazines, newspapers, digital etc) to the public.

Influencer: An individual – often a celebrity – who has a significant online audience of members of the public and uses digital platforms to influence public opinion or behaviour.

1.2 Kind of ToVs

Donations and grants to HCOs – Donations and Grants to HCOs that support healthcare, including donations and grants to institutions, organisations or associations that are comprised of HCPs and/or that provide healthcare. These transfers of value are altruistic in nature.

Donations, grants to Patient Organisations – Donations (non-financial), grants, and sponsorship (financial) to a PO and HCOs includes monetary value of financial and non-financial support.

Transfer of value to Members of the public, including patients and journalists – Fees for certain contracted services paid to members of the UK public, including patients and journalists (e.g. speaking at meetings, assistance with training, writing articles, participating in advisory boards, advising on clinical trials, market research involving remuneration/travel). These are disclosed in aggregate.

Research and Development (R&D) transfers of value – Activities related to the planning or conduct of: conducting non-clinical studies (OECD GLP), Phase I–IV clinical trials (EU legislation), non-interventional studies. These are disclosed in aggregate.

Contribution to costs of Events – Includes sponsorship agreements with HCOs/POs/third parties, HCP/ORDM registration fees, travel and accommodation. Subsistence costs for UK HCP/ORDM attendance at events/meetings are not disclosed.

Fee for Service and Consultancy – Fees and any related expenses (travel, accommodation, registration) under consultancy agreements with HCP/ORDM/HCO/PO or member of the public.

2 Disclosure's Scope

2.1 Products concerned

Prescription Only Medicines only

2.2 Company concerned

Celltrion Healthcare United Kingdom Limited ("Celltrion"). Disclosures cover transfers of value made by Celltrion Healthcare United Kingdom Limited. Transfers made by other Celltrion Healthcare entities (or via agencies) to a UK HCP/ORDM/HCO are included only where the recipient's primary practice/registration is in the UK. Cross-border activities initiated by other Celltrion affiliates with a UK recipient are disclosed by Celltrion UK.

2.3 Excluded ToVs

Meals, drinks, samples, package deals, promotional aids, and items for patient support are out of scope.

2.4 ToVs date

The disclosure includes applicable ToVs during the period 1 January 2025 to 31 December 2025.

Celltrion defines two types of ToVs for reporting-date purposes:

Monetary ToV – Actual payment date (irrespective of when the event/work took place).

Non-monetary ToV – Date the recipient received the in-kind benefit or the event date.

A Monetary Transfer of Value is a payment of money made to an HCP/HCO by Celltrion either directly or through an intermediary (for example, fees for service). The Reporting Date for Monetary ToVs will be the actual payment date, irrespective of when the event happened (for example, when a consultancy fee is paid, not when the work took place).

A Non-monetary Transfer of Value is an in-kind benefit received from Celltrion either directly or through an intermediary without a monetary payment (a flight or fee paid to a travel agent or event's organiser, for example). The Reporting Date for Non-Monetary ToVs will be the date the recipient received the in-kind benefit or the event date (for example, when the event took place).

2.5 Direct ToVs

Direct transfers include fees for service/consultancy paid directly by Celltrion, donations/grants paid directly, and direct sponsorship/registration/travel costs for events.

2.6 Indirect ToVs

Indirect transfers include payments made by third-party agencies (e.g. advertising/PR agencies) or other Celltrion entities on Celltrion UK's behalf where the identity of Celltrion is known to the recipient. Celltrion makes best efforts to capture and report these as if made directly.

2.7 Non-monetary ToVs

Celltrion Healthcare United Kingdom Limited has not provided any non-monetary transfers of value to UK HCPs, ORDMs, HCOs in 2025.

2.8 ToVs in case of partial attendances or cancellation and refund

ToVs will only be disclosed where the benefit has been received. In the event of a cancellation or where an HCP/ORDM/HCO does not receive the benefit due to non-participation, Celltrion will not disclose ToVs against that recipient.

2.9 Cross-border activities

A “cross-border” activity is one initiated by a Celltrion Healthcare affiliate other than the UK (or by Celltrion Inc./Celltrion Pharma in Korea) with a UK recipient. Celltrion UK will disclose the ToV (whether inside or outside the UK) when the recipient’s principal practice (HCP/ORDM) or registration (HCO) is in the UK.

2.10 R&D

Transfers of value relating to R&D are disclosed in aggregate. These are activities related to the planning or conduct of studies that fall under one of the following categories: conducting non-clinical studies (OECD GLP), Phase I to IV clinical trials (EU legislation), non-interventional studies.

2.11 Voluntary disclosure

No voluntary disclosures beyond what is required by the ABPI Code are included in the disclosure

3 Specific considerations

3.1 Country unique identifier

Not applicable. No unique identifiers are collected or submitted in the disclosure process.

3.2 Self-incorporated HCP

Celltrion Healthcare United Kingdom Limited discloses transfers of value made to self-incorporated healthcare professionals (i.e. health professionals who provide services through their own limited company) against the name of the individual healthcare professional, rather than against the name of their limited company.

This approach is taken in accordance with Clauses 1.8 and 1.25 of the ABPI Code of Practice.

3.3 Multi-year agreements

Celltrion Healthcare United Kingdom Limited has no multi-year agreements with Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs) or Healthcare Organisations (HCOs) during the reporting period.

For clinical studies and research agreements that span multiple years, only the transfers of value actually paid or transferred in the reporting year are disclosed. The total contracted value of any multi-year agreement is not disclosed; disclosure is limited to the amounts settled during the current disclosure period.

This approach ensures that the Company reports only the transfers of value that occurred within the relevant calendar year, in line with the ABPI Code of Practice.

3.4 Country specificities

Celltrion Healthcare United Kingdom Limited did not participate in any collaborative working projects or cross-company working arrangements with other pharmaceutical companies during the 2025 reporting period.

Consequently, there are no transfers of value to be divided between companies and no collaborative working executive summaries are required. No links to executive summaries have been included in the disclosure.

All transfers of value are therefore disclosed solely by Celltrion Healthcare United Kingdom Limited in accordance with the ABPI Code of Practice.

3.5 Quality Checks

All transfer of value data collected during the period of disclosure undergo a review process involving departmental and medical personnel to ensure accuracy, correct classification, and alignment with recipient consent and documentation. This includes reconciliation with financial systems and aggregation checks for public-facing disclosures. Once validated, the final dataset is approved by senior medical personnel. The methodology statement is published alongside the disclosures and updated annually or as needed. Records are retained for five years.

4 Data protection legal basis

4.1 Consent collection

During this reporting period consent for disclosure of information including third-party handling of personal data has been sought for all HCPs/ORDMs through signed agreements/contracts in line with General Data Protection Regulation (GDPR) requirements. Provided an HCP/ORDM did not object to Celltrion processing and disclosing their personal data in this way, the total sum of all transfers of value made by Celltrion to the HCP/ORDM was disclosed on an individual named basis.

Where individual recipients of value cannot be identified for legal reasons, or where an HCP/ORDM decides not to agree to disclosure of one or more ToVs, the amount is disclosed on an aggregate basis (with number of recipients, percentage, and aggregate amount stated).

Any ToV made directly by Celltrion or via a third party to members of the public (including patients and journalists) is disclosed in aggregate to protect personal privacy.

4.2 Legitimate interests

Celltrion Healthcare United Kingdom Limited does not rely on legitimate interests (or any other lawful basis) as the legal ground for the processing and public disclosure of personal data relating to Healthcare Professionals (HCPs) or Other Relevant Decision Makers (ORDMs).

The Company continues to use explicit consent obtained via signed agreements as the lawful basis. HCPs and ORDMs are clearly informed, prior to any transfer of value, that their data will be disclosed and are given the opportunity to withhold or withdraw consent at any time. Any withdrawal of consent is actioned promptly.

5 Form of disclosure

5.1 Date of publication

30/06/26

5.2 Disclosure platform

Disclosure UK – www.disclosureuk.org.uk

5.3 Disclosure language

English

6 Disclosure financial data

6.1 Currency

Payments to UK HCPs, ORDMs, HCOs are recorded in local GBP currency. Where an amount is requested in another currency, it is calculated on the day of approval or at time of disclosure using a currency converter tool at a commercial bank website.

6.2 VAT included or excluded

Celltrion Healthcare United Kingdom Limited discloses the actual transfers of value paid or provided to recipients. Amounts are shown either inclusive or exclusive of VAT, depending on the specific terms agreed with the individual HCP, ORDM or HCO.

Any tax liabilities (including VAT or income tax) arising from the transfers of value are the sole responsibility of the recipient as set out in the relevant agreement. Celltrion Healthcare United Kingdom Limited is not liable for any UK taxes in relation to the disclosed transfers of value.

6.3 Calculation rules

Celltrion Healthcare United Kingdom Limited did not make any in-kind transfers of value or provide any other non-monetary benefits to Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs) or Healthcare Organisations (HCOs) during the 2025 reporting period.

As no such transfers occurred, no specific calculation rules for the valuation of in-kind or non-monetary transfers of value were required or applied.

All transfers of value disclosed were monetary payments only.

7 Additional Information

None