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Country: United Kingdom

Bioprojet UK Limited: Methodological note for HCP/ORDM/HCO disclosure 2025

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As an ethical pharmaceutical company, and in accordance with Clause 28 of the ABPI Code of Practice 2024, and Clause 23.05 of the EFPIA Disclosure Code, Bioprojet UK Limited has clear and concise standard operating procedures in place for the assessment, approval, and processing of all transfer of value (ToV) to healthcare professionals and healthcare organisations.

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1 Definitions

1.1 Recipients

ToV declarations cover all persons and entities to whom transfers of earnings were paid, where their primary function, job, or role, is that of a healthcare professional (HCP), other relevant decision maker (ORDM) or healthcare organisation (HCO), such as GPs, Nurses, Hospital Trusts etc.

1.2 Kind of ToVs

Donations and Grants to HCOs collectively mean providing funds freely given for the purpose of supporting healthcare, scientific research or education. Donations and grants are given with no consequent obligation on the recipient to provide goods or services to the benefit of the donor in return.

ToVs made to HCOs/third party organisations appointed by HCOs to manage an Event refer to contributions made in whole or in part, towards an activity such as an event or meeting, performed/organised/created etc by a HCO, patient organisation, or other third-party organisation. ToVs are made directly to the HCO or to the 3rd party organisation appointed by the HCO to manage the event. In all cases, ToVs are disclosed against the HCO that ultimately benefits from the support.

TOVs made to HCPs covering the cost of events are split between:

- Registration fees, for example, covering the cost of registration fees to support an HCO or ORDM to attend educational events or meetings that are organised by independent organisations.
- Travel and accommodation, which can include flights, trains, hotel accommodation, public transport, parking.

Any expenses related to subsistence (food/drink) are not disclosed as per the guidelines of the ABPI 2024 Code of Practice

2 Disclosure's Scope

2.1 Products concerned

Bioprojet UK ToV's concern prescription only medications (POMS)

2.2 Company concerned

Bioprojet UK is a Group Company of Bioprojet Pharma, and operates in multiple countries. Bioprojet UK also manages distribution of products in Ireland. In the interests of transparency, Bioprojet UK has included any transfers of value made to UK HCP/HCO/ORDMs by its Parent Company, Bioprojet Pharma.

2.3 Excluded ToVs

Any expenses related to subsistence (food/drink) are not disclosed as per the guidelines of the ABPI 2024 Code of Practice

2.4 ToVs date

All disclosed payments are for the period of 1st January 2025 to 31st December 2025

2.5 Direct ToVs

Defined as ToVs paid directly to HCPs/HCOs/ORDMs listed under 1.2

2.6 Indirect ToVs

Defined as ToVs paid directly to a third party appointed by an HCO, for example, an Event Management company arranging a conference or exhibition on behalf of the HCO.

2.7 Non-monetary ToVs

Bioprojet UK does not provide non-monetary ToVs.

2.8 ToVs in case of partial attendances or cancellation and refund

As ToVs are only paid to HCPs after an agreed event has been attended and on presentation of appropriate receipts, ToVs are only ever paid where the activities have been undertaken.

2.9 Cross-border activities

Bioprojet UK manages distribution in Ireland for its Parent Company. Any payments to Irish HCP/HCO/ORDMs are reported to Bioprojet Pharma for disclosure under EFPIA disclosure rules. In the interests of transparency, Bioprojet UK has included any transfers of value made to UK HCP/HCO/ORDMs by its Parent Company, Bioprojet Pharma. Payments made in Euros to UK HCPs have been entered at a conversion rate of £1 = €1.20.

2.10 R&D

All ToV related to R&D activities performed by Bioprojet UK or Bioprojet Group Companies will be disclosed on an aggregate basis. R&D activities include but are not limited to, non-clinical studies, clinical trials, non-interventional studies etc.

2.11 Voluntary disclosure

Is highlighted in Section 2.2, Bioprojet UK voluntarily discloses ToV made by its European Parent Company to UK HCP/HCO/ORDMs.

3 Specific considerations

3.1 Country unique identifier

Bioprojet UK does not county unique identifiers, nor any suppliers of such data.

3.2 Self-incorporated HCP

Bioprojet UK has not undertaken any activities that require ToV to any self-incorporated HCPs in 2025.

3.3 Multi-year agreements

Bioprojet UK has two agreements in place with UK HCOs that span ToV activities in 2025 and 2026. Each year is disclosed independently for that year's respective ToV value paid.

3.4 Country specificities

Bioprojet UK does not have collaborative working projects with other UK Pharmaceutical Companies.

3.5 Quality Checks

ToV values are documented throughout the year, proposed ToV disclosure values are cross-referenced against actual payments made, with Bioprojet UK's accounts team. Any discrepancies are investigated pre-disclosure and corrected as necessary.

4 Data protection legal basis

4.1 Consent collection

ToVs are only made to HCP/HCO/ORDMs with whom a written contractual agreement has been signed in advance of any event. This contractual agreement features a mandatory statement of intent to publish ToV via Disclosure by Bioprojet UK.

In the event that any HCO/HCP/ORDM does not accept ToV disclosure as part of the contract, Bioprojet UK will not proceed with the service agreement. We consider this to be a legitimate interests declaration that does not require consent.

4.2 Legitimate interests

All contractual agreements for ToV outline Bioprojet UK's legitimate interests in disclosing ToV data to the public.

As above, there is no opt out of consent for public disclosure; if this is not acceptable to an HCP/HCO/ORDM, they would not sign the contract, and thus no ToV would be due.

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

ToV amounts made directly to UK HCPs usually falls under the banner of reimbursement for travel expenses, conference attendance fees etc and will include VAT

ToV amounts made to HCOs exclude VAT

6.3 Calculation rules

As Bioprojet UK only pays monetary ToVs to UK HCP/HCO/ORDMs, there are no calculation rules required.

Payments made in Euros to UK HCPs have been entered at a conversion rate of £1 = €1.20.

7 Additional Information

Nothing additional information to add.