



# BioCryst UK Ltd: Methodological note for HCP/ORDM/HCO disclosure 2025

Data year: 2025

Year of publication: 2026

Introduction This methodology note describes the methods used by BioCryst UK Ltd to meet its obligations and the requirements for disclosing payments and Transfers of value (ToV) to Healthcare Professionals (HCPs), Healthcare Organisations (HCOs) and Other Relevant Decision Makers (ORDMs) as outlined in the EFPIA HCP/HCO Code of Practice and reflected in the ABPI Code of Practice for the Pharmaceutical industry.

Transfers of Values made to Patient Organisations (PtOrgs) are disclosed separately on the BioCryst UK Ltd website:- <https://www.neopharmedgentili.com/uk/>

## Contents

1	<b>Definitions</b> .....	2
1.1	Recipients .....	2
1.2	Kind of ToVs .....	3
2	<b>Disclosure's Scope</b> .....	4
2.1	Products concerned .....	4
2.2	Company concerned .....	5
2.3	Excluded ToVs .....	5
2.4	ToVs date .....	5
2.5	Direct ToVs .....	5
2.6	Indirect ToVs .....	5
2.7	Non-monetary ToVs .....	5
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 .....	6

3	<b>Specific considerations</b> .....	6
3.1	Country unique identifier .....	6
3.2	Self-incorporated HCP .....	6
3.3	Multi-year agreements .....	6
3.4	Country specificities .....	6
3.5	Quality Checks .....	6
4	<b>Data protection legal basis</b> .....	6
4.1	Consent collection.....	6
4.2	Legitimate interests .....	7
5	<b>Form of disclosure</b> .....	7
5.1	Date of publication .....	7
5.2	Disclosure platform .....	7
5.3	Disclosure language.....	7
6	<b>Disclosure financial data</b> .....	7
6.1	Currency .....	7
6.2	VAT included or excluded.....	7
6.3	Calculation rules.....	7
7	<b>Additional Information</b> .....	7

# 1 Definitions

## 1.1 Recipients

Healthcare Professional (HCP)	Anyone that is a member of the medical, dental, pharmacy or nursing professions and any other professional that may administer, prescribe, purchase, recommend or supply a medicine.
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, or an entity through which an HCP (as defined above) or other relevant decision makers provide a service.
Other Relevant Decision Maker (ORDM)	The term 'other relevant decision maker' 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 health professionals
Patient Organisations (PtOrgs)	An organisation mainly comprising of patients and/or caregivers or any user organisation such as a disability organisation, carer or relative organisation and consumer organisation that represents and/or supports the needs of patients and/or caregivers.

Professional Conference Organiser (PCO)	a company which specialises in the organisation and management of congresses, conferences, seminars and similar events.
Transfer of Value (ToV)	Direct and indirect transfers of value, whether payments, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of prescription-only Medicinal Products exclusively for human use. Direct transfers of value are those made directly by a Member Company for the benefit of a Recipient. Indirect transfers of value are those made on behalf of a Member Company for the benefit of a Recipient, or transfers of value made through an intermediate and where the Member Company knows or can identify the HCP/HCO that benefit from the Transfer of Value.
Member Company	as defined in the EFPIA Statutes, means research-based companies, developing and manufacturing Medicinal Products in Europe for human use.
Recipient	Any HCP or HCO/PCO as applicable, in each case, whose primary practice, principal professional address or place of incorporation is in Europe.

## 1.2 Kind of ToVs

EFPIA category	EFPIA subcategory	Example Activities
<b>Donations and Grants (HCOs only)</b>	N/A	<ul style="list-style-type: none"> <li>• Charitable contributions</li> <li>• Business Donations</li> <li>• Educational grants (e.g. fellowships, courses provided by an HCO where BioCryst does not select the individual HCPs participating)</li> <li>• Sponsoring of speakers/faculty which by nature of purpose and funding are classified under educational grants</li> </ul>
<b>Contribution to Cost of Events</b>	Sponsorship agreements (HCOs only)	<ul style="list-style-type: none"> <li>• Placement of a brand logo in a conference program or invitation communication in exchange for supporting the program</li> <li>• Funding an event in return for a display booth</li> <li>• Funding an event in exchange for advertising space</li> <li>• Other advertisement space (in paper, electronic or other format)</li> <li>• Satellite symposia at a congress</li> <li>• Any other activity qualified as “Corporate Sponsorship” according to BioCryst Anti-Corruption Policies</li> <li>• Sponsoring of speaker/faculty and sponsoring courses provided by an HCO which are</li> </ul>

		<p>qualified as “Corporate Sponsorship” according to BioCryst Anti-Corruption Policies</p> <ul style="list-style-type: none"> <li>• For contributions provided to Events through Professional Conference Organisers (PCOs): TOVs through PCOs are reported as follows: either in the name of benefitting HCO or in the name of Recipient PCO</li> </ul>
	Registration fees	<ul style="list-style-type: none"> <li>• Registration fees paid for the HCP/HCO to attend events</li> </ul>
	Travel & Accommodation	<ul style="list-style-type: none"> <li>• Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking, shared ground transportation)</li> <li>• Accommodation</li> <li>• Travel Visa</li> </ul>
<b>Fee for services and consultancy</b>	Fees	<ul style="list-style-type: none"> <li>• Speaker engagements</li> <li>• Advisory Boards*</li> <li>• Study-related engagements</li> <li>• Preceptorships</li> <li>• Post-marketing surveillance studies</li> <li>• Non-Interventional Studies that are Retrospective in nature</li> <li>• Medical writing</li> <li>• Data analysis</li> <li>• Development of education materials</li> <li>• General consulting / advising</li> <li>• Speaker training if linked to a speaker engagement</li> <li>• Any other activity which qualifies as General Consultancy according to BioCryst’s Anti-Corruption Policies</li> </ul>
	Related expenses	<ul style="list-style-type: none"> <li>• Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking)</li> <li>• Accommodation</li> <li>• Travel Visa</li> </ul>
<b>Research and Development Transfers of Value</b>	N/A	<ul style="list-style-type: none"> <li>• Clinical Trials</li> <li>• Data Monitoring Committees related to studies</li> <li>• Non-Interventional Studies that are Prospective in nature</li> <li>• Investigators Initiated Research (IIR)</li> <li>• Investigator Sponsored Research (ISR)</li> <li>• Clinical &amp; Research Collaboration</li> </ul>

## 2 Disclosure’s Scope

### 2.1 Products concerned

POM

## **2.2 Company concerned**

BioCryst UK Ltd, an affiliate of BioCryst Pharmaceuticals Inc, discloses on behalf of all Affiliates ('BioCryst') which may make ToVs to UK HCPs, HCOs and Patient Organisations

## **2.3 Excluded ToVs**

None

## **2.4 ToVs date**

1<sup>st</sup> January 2025 – 31<sup>st</sup> December 2025.

## **2.5 Direct ToVs**

Payments made directly by BioCryst UK for the benefit of a Recipient e.g. Fees for Service and related expenses, Donations and Grants (HCOs only), Contribution to Cost of Events

## **2.6 Indirect ToVs**

Made by a third party (such as contractors, CROs, agents, partners, affiliates (including foundations)) on behalf of BioCryst UK for the benefit of a Recipient, where the identity of such Member Company is known or can be identified by the Recipient that will benefit from the ToV. This also includes ToVs between BioCryst UK and POs, however this is disclosed within a PO specific report. E.g. Travel and Accommodation costs, Registration Fees

## **2.7 Non-monetary ToVs**

None. e.g. provision of company staff time or expertise

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

Cancellation fees (penalty for annulling a confirmed arrangement or order) are not disclosed. In the case of partial attendance, ToVs are disclosed in full. If cancelled and refunded, the ToV is not disclosed.

## **2.9 Cross-border activities**

BioCryst UK Ltd collates cross border payments from BioCryst Pharmaceuticals Inc together with all its Affiliates ('BioCryst') and reports the transactions where the recipient has its principal practice in the UK

## **2.10 R&D**

Payments made for research and development activities are disclosed in aggregate. For the purposes of the disclosure, these activities are defined as transfers of value to HCPs or HCOs related to the planning or conduct of:

- non-clinical studies (as defined in OECD Principles on Good Laboratory Practice).
- clinical trials (as defined in Directive 2001/20/EC); or
- non-interventional studies (NIS) 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 (Section 18.01 of the EFPIA Code).

ToVs relating to NIS that are not within the definition of R&D ToV under the EFPIA Disclosure Code must be reported on an individually named basis. For sake of clarity, activities not falling within the definition of R&D ToV, including NIS that are not conducted to maintain a marketing authorization (in application and following definitions of the "Clinical Trials" Regulation 536/2014), will be disclosed under "consultancy/fee-for-services".

## **2.11 Voluntary disclosure**

N/A

# **3 Specific considerations**

## **3.1 Country unique identifier**

BioCryst UK do not use country unique identifiers in their Disclosure report

## **3.2 Self-incorporated HCP**

Where an HCP/ORDM runs a private company, this organisation has been designated an HCO. Where a contract has been signed with the HCO as the employer, BioCryst will report the ToV against the named HCP unless consent is not given

## **3.3 Multi-year agreements**

For contracts that span more than 1 year (multi-year contracts), only ToV made during year 2025 will be included in the 2025 disclosure. The remainder of the contract values will be disclosed in future disclosure.

## **3.4 Country specificities**

N/A

## **3.5 Quality Checks**

BioCryst UK disclosure team check financial reports and payment reports to ensure that all relevant ToV are accurately classified and disclosed using consistent definitions from year to year.

# **4 Data protection legal basis**

## **4.1 Consent collection**

Consent for the publication of the ToVs was obtained and documented as such before disclosing the data on an individual HCP/HCO level where applicable. Consent management procedures were conducted in alignment with the UK Data Protection Act 2018 and EU General Data Protection Regulation.

Consent was obtained either on Recipient level for all ToVs during a given period of time not shorter than one full year or on spend level for each interaction or single ToVs.

BioCryst does not accept partial consent or split disclosure.

In case consent was either not given by the Recipient or not documented sufficiently to prove the existence of consent, ToVs are disclosed on aggregate level only.

In the event of death of an HCP by the time of disclosure (by the publication date) the ToV is reported in aggregate.

HCP's have a right to withdraw their consent at any time. Consent withdrawal has been assessed according to the relevant BioCryst local data privacy laws and withdrawal of consent will have retroactive effect on past events and consultancies provided BioCryst has not already had to report the data to the ABPI to meet the annual disclosure requirement. If the latter is the case, then the withdrawal of consent would only be effective for the future.

#### **4.2 Legitimate interests**

BioCryst UK does not currently use Legitimate interest reporting procedure. Consent for the publication of the ToVs was obtained and documented as such before disclosing the data on an individual HCP/HCO level where applicable.

## **5 Form of disclosure**

### **5.1 Date of publication**

30<sup>th</sup> June 2026

### **5.2 Disclosure platform**

[www.disclosure.org.uk](http://www.disclosure.org.uk)

### **5.3 Disclosure language**

English

## **6 Disclosure financial data**

### **6.1 Currency**

GBP

In the case where ToVs have been made in a different currency, BioCryst UK have calculated the disclosed amount in local currency, based on the daily exchange rate effective on the date of the ToV.

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

Where possible, the Net amount is disclosed. If VAT cannot accurately be excluded, the Gross amount is disclosed.

### **6.3 Calculation rules**

N/A

## **7 Additional Information**

N/A