

Kora Healthcare: Methodological note for HCP/ORDM/HCO disclosure 2025

Data year: 2025

Year of publication: 2026

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1. Definitions

1.1. Recipients

HCP – Healthcare Professional includes any member of the medical, dental, pharmacy or nursing profession and any other person who 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 of ABPI Code), the term also includes any employee of a pharmaceutical company whose primary occupation is that of a practising health professional.

HCO- Healthcare organisation’ means either 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 health professionals or other relevant decision makers provide services. If a healthcare organisation consists of only one health professional or other relevant decision maker, then it would be subject to the requirements in the Code regarding individual health professionals

1.2. Kind of ToVs

ToV- Transfer of value’ means a direct or indirect transfer of value, whether in cash, in-kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development or sale of medicines. A direct transfer of value is one made directly by Kora Healthcare for the benefit of a recipient. An indirect transfer of value is one made on behalf of Kora Healthcare for the benefit of a recipient or through an intermediate and where the company knows or can identify the recipient that will benefit from the transfer of value.

The following are not transfers of value for the purposes of this methodological note:

- transfers of value that are solely related to OTC medicines
- ordinary course purchases and sales of medicines by and between Kora Healthcare and a health professional or a healthcare organisation
- samples of medicines provided in accordance with Clause 21 of the ABPI Code
- transfers of value provided in accordance with Clauses 10.5, 10.6 and 19.2 of the ABPI Code
- subsistence provided to health professionals and other relevant decision makers in accordance with Clause 10.1 of the ABPI Code

Contribution to costs related to events in relation to the disclosure of transfers of value means providing or covering the costs of travel, accommodation and/or registration fees to support the attendance of an individual to an event organised or created by a company and/or independent organisation. When providing sponsorship of events/ meetings to organisations, associations, etc. such contributions may include costs for subsistence (food and drink)

Donations and Grants

'Donations and grants' collectively mean providing funds, benefits-in-kind or services freely given for the purpose of supporting healthcare, scientific research or education, with no consequent obligation on the recipient organisation, institution and the like to provide goods or services to the benefit of the pharmaceutical company in return. Donations and grants to individuals are prohibited. In general, donations are physical items, services or benefits-in-kind which may be offered or requested. Grants are the provision of funds.

Sponsorship Agreements

KH can provide sponsorship for an activity to certain organisations. 'Sponsorship' means a contribution, financial or otherwise, in whole or in part provided by or on behalf of KH, towards an activity (including an event/meeting or material) performed, organised, created, etc. by a healthcare organisation, patient organisation or other independent organisation.

Support

Kora Healthcare can provide support for individual health professionals or other relevant decision makers to attend events/meetings. 'Support' in this context is the provision of a financial contribution, in whole or in part, whether paid directly or indirectly to individual health professionals or other relevant decision makers to attend events/meetings

2. Disclosure's Scope

2.1 Products concerned

The scope of Kora Healthcare's ToV's include Prescription Only Medicines. Medical devices and over-the-counter medicines are not included.

2.2 Company concerned

Kora Corporation subsidiary Kora Healthcare UK Limited

2.3 Excluded ToVs

- transfers of value that are solely related to OTC medicines
- ordinary course purchases and sales of medicines by and between Kora Healthcare and a health professional or a healthcare organisation
- samples of medicines provided in accordance with Clause 21 of the ABPI Code
- transfers of value provided in accordance with Clauses 10.5, 10.6 and 19.2 of the ABPI Code
- subsistence provided to health professionals and other relevant decision makers in accordance with Clause 10.1 of the ABPI Code

2.4 ToVs date

1st January 2025 – 31st January 2025

2.5 2.5 Direct ToVs

A Direct ToV is one made directly by Kora Healthcare for the benefit of a Recipient. Direct ToVs typically covers items such as fees for services and associated travelling expenses.

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

n/a

2.9 Cross-border activities

n/a

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

n/a

3.3 Multi-year agreements

n/a

3.4 Country specificity

United Kingdom Only

3.5 Quality Checks

All ToVs are signed by the CEO prior to payment. All ToVs are reconciled with the Finance Department prior to Disclosure

4 Data protection legal basis

4.1 Consent collection

Whenever possible, Kora Healthcare follows the principle of disclosure on individual HCP/HCO level, to ensure that each Recipient is referred to in such a way that there is no doubt as to the identity of the HCP/HCO benefitting from the ToVs. This is included in the contractual agreement between Kora Healthcare and the HCP/HCO. If consent is provided, Kora Healthcare will disclose all ToV for that HCP/HCO. If no consent is provided, the ToV will be disclosed on an aggregate (non-named) basis

4.2 Legitimate interests

N/A

5 Form of disclosure

5.1 Date of publication

31st June 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 nVAT included or excluded

Vat is excluded

6.3 Calculation rules

n/a

7 Additional Information

N/A