

Organon UK: Methodological Note for HCP/ORDM/HCO Disclosure 2025

Contents

Organon UK: Methodological Note for HCP/ORDM/HCO Disclosure 2025	2
Introduction.....	2
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	3
2.3 Excluded ToVs.....	3
2.4 ToVs date	3
2.5 Direct ToVs.....	3
2.6 Indirect ToVs	3
2.7 Non-monetary ToVs.....	4
2.8 ToVs in case of partial attendances or cancellation and refund	4
2.9 Cross-border activities.....	4
2.10 R&D.....	4
2.11 Voluntary disclosure.....	4
3. Specific considerations.....	4
3.1 Country unique identifier	4
3.2 Self-incorporated HCP	4
3.3 Multi-year agreements.....	4
3.4 Country specificities.....	4
3.5 Quality Checks.....	4
4. Data protection legal basis.....	5
4.1 Consent collection	5
4.2 Legitimate interests.....	5
5. Form of disclosure.....	5
5.1 Date of publication.....	5
5.2 Disclosure platform	5
5.3 Disclosure language	5
6. Disclosure financial data.....	5
6.1 Currency	5
6.2 VAT included or excluded	5
6.3 Calculation rules.....	5
7. Additional Information.....	5

Organon UK: Methodological Note for HCP/ORDM/HCO Disclosure 2025

Version: Last updated 30 March 2026

Country: United Kingdom

Data year: 2025

Year of publication: 2026

Introduction

This methodological note explains how Organon Pharma UK collected, organised and reported the 2025 transfers of value (ToVs) to health professionals (HCPs), other relevant decision makers (ORDMs) and healthcare organisations (HCOs) in accordance with the ABPI Code of Practice and EFPIA requirements. It follows the mandatory EFPIA/PMCPA standardised structure to support clarity and comparability of disclosure information.

1. Definitions

1.1 Recipients

Recipients are HCPs, ORDMs and HCOs whose primary practice, main professional address or place of incorporation is in the United Kingdom. “Healthcare Organisation (HCO)” includes healthcare, medical or scientific associations or organisations such as hospitals, clinics, foundations, universities or other teaching institutions or learned societies. “Health Professional (HCP)” includes members of the medical, dental, pharmacy and nursing professions and other persons who, in the course of their professional activities, may administer, prescribe, purchase, recommend or supply a medicine; this includes ORDMs with NHS roles who could influence the use of medicines.

Deceased/retired recipients: Organon follows PMCPA guidance. Where a ToV was made prior to death or retirement, it is disclosed in the relevant data year. Any necessary updates are made via the Disclosure UK processes, in line with the platform’s rules.

1.2 Kind of ToVs

Organon discloses the following kinds of ToVs:

- HCO: Donations and Grants for supporting healthcare, scientific research or education (no benefit in return).
- HCO: Contributions to costs related to events (e.g., sponsorship agreements, booth/stand hire, satellite symposia, sponsorship of speakers/faculty).
- HCO: Fees for services and consultancy (and related expenses).
- HCO: Package deals, which are commercial arrangements whereby the purchase of a particular medicine is linked to the provision of certain associated benefits as part of the purchase price, such as apparatus for administration, the provision of training on its use or the services of a nurse to administer it. Such indirectly provided services, either to Patients or to HCPs, are included in the HCO section. Organon discloses the total value for these services on the third-party HCO contracted for the provision for these services.
- HCP: Contributions to costs related to events (registration fees; travel and accommodation).
- HCP: Fees for service and consultancy (e.g., speaking, advisory services, medical writing, data analysis, development of educational materials, market research when the identity is known to Organon).

- Research & Development (R&D): ToVs related to non-clinical studies, clinical trials and prospective non-interventional studies that involve data collection from, or on behalf of, HCPs or HCOs.
- Collaborative working (if applicable): where collaborative working projects involve ToVs within scope of the ABPI Code, these are disclosed in line with the categorisations above and UK guidance.

2. Disclosure's Scope

2.1 Products concerned

Disclosures relate to activities connected to the development and sale of prescription-only medicines. Transfers solely related to over-the-counter medicines or medical devices are not included.

2.2 Company concerned

This disclosure covers Organon Pharma UK and all relevant ToVs to UK-based recipients associated with the Organon group. Regardless of which Organon entity contracted with or paid a recipient, ToVs to UK recipients are disclosed in the UK.

2.3 Excluded ToVs

The following ToVs are excluded from disclosure:

- ToVs solely related to over-the-counter medicines.
- Ordinary course purchases and sales of medicines (e.g., between Organon and a pharmacy).
- Medical samples, investigational compounds and biological samples for study.
- Informational or educational materials and items of medical utility.
- ToVs to patient organisations (disclosed separately under relevant requirements).
- Meals and drinks.

2.4 ToVs date

Direct ToVs are disclosed based on the date Organon paid the ToV. E.g. if the payment occurred within the reporting period 1st January 2025 to 31st December 2025, the TOV would be disclosed in the 2025 report.

Indirect ToVs concerning travel and accommodation are disclosed based on the date the event took place. E.g. if the travelling occurred within the reporting period 1st January 2025 to 31st December 2025, the iTOV would be disclosed in the 2025 report.

2.5 Direct ToVs

Direct ToVs include, for example:

- Fees for service and consultancy paid, and related expenses, paid directly to HCPs or HCOs.
- Donations and Grants paid directly to HCOs.
- Sponsorships or contributions to costs of events paid to HCOs.

2.6 Indirect ToVs

Indirect ToVs include, for example:

- Travel and accommodation arranged or reimbursed through intermediaries for HCPs.
- Sponsorships or contributions to costs of events paid to third parties on behalf of HCOs.

2.7 Non-monetary ToVs

Where non-monetary ToVs are provided (e.g., in-kind support or staff time within collaborative projects), these are valued at the actual cost to Organon using available internal records and are disclosed within the relevant category.

2.8 ToVs in case of partial attendances or cancellation and refund

ToVs are reported on the basis of what Organon paid, not what the recipient ultimately received. Accordingly, in cases of partial attendance, the full amount paid by Organon is disclosed. Where a HCP cancels and no cost is incurred by Organon, no ToV is disclosed.

2.9 Cross-border activities

All ToVs to UK recipients are disclosed in the UK, irrespective of which Organon entity contracted with, organised or paid for the activity.

2.10 R&D

R&D ToVs include those related to non-clinical studies (as per OECD Principles on Good Laboratory Practice), clinical trials (as per Directive 2001/20/EC), and prospective non-interventional studies involving data collection from, or on behalf of, HCPs/HCOs.

2.11 Voluntary disclosure

Not applicable.

3. Specific considerations

3.1 Country unique identifier

Organon uses internal commercial identifiers to uniquely identify recipients within our systems. In the UK, publicly available professional identifiers (e.g., GMC numbers) are not submitted to Disclosure UK; internal identifiers are used solely for data integrity and reconciliation.

3.2 Self-incorporated HCP

Where an HCP operates via their own limited company, Organon attributes the ToV to the individual HCP (in line with ABPI definitions) and discloses it in the individual HCP/ORDM section, unless UK guidance requires otherwise.

3.3 Multi-year agreements

For multi-year agreements, Organon discloses the value in the year in which the ToV is made (i.e., when the cost is incurred/posted), with amounts reported for each calendar year accordingly.

3.4 Country specificities

Collaborative working with other pharmaceutical companies: Not applicable for 2025. Where such projects occur in future, ToVs will be divided in line with contractual contributions, and links to collaborative working executive summaries will be provided in accordance with UK guidance.

3.5 Quality Checks

Prior to submission, Organon performs internal quality checks including: (i) reconciliation of finance system postings to disclosure categories; (ii) cross-checks with approved contracts/letters of agreement; (iii) validation of event-related costs against event management

and travel systems; (iv) duplicate and outlier detection; and (v) senior sign-off of aggregate totals.

4. Data protection legal basis

4.1 Consent collection

Not applicable. Organon relies on Legitimate Interests for publication of individual HCP/ORDM data (see 4.2).

4.2 Legitimate interests

From January 2022 onwards, Organon UK relies on Legitimate Interests as the legal basis for processing and publishing transfer of value data related to HCP/ORDM activities. This is communicated within contracts and letters of agreement. Individuals may object to processing by contacting privacyteam@organon.com. Organon assesses objections via a documented balancing test and will cease processing unless compelling legitimate grounds are demonstrated.

5. Form of disclosure

5.1 Date of publication

30/06/2026

5.2 Disclosure platform

Disclosure UK – www.disclosureuk.org.uk

5.3 Disclosure language

English

6. Disclosure financial data

6.1 Currency

GBP. Where costs are incurred in other currencies, values are converted using the exchange rate applicable on the date the cost is incurred/posting date within Organon's finance systems.

6.2 VAT included or excluded

Indirect ToVs (e.g., travel and accommodation arranged on behalf of, or reimbursed to, HCPs) include VAT. Direct payment ToVs exclude VAT (Organon recovers VAT where applicable).

6.3 Calculation rules

Disclosed ToVs reflect the actual cost paid by Organon. In-kind/non-monetary ToVs (if any) are measured at Organon's cost. Refunds and credit notes are netted in the period they post, aligned to the ToV recognition rules described in Section 2.4.

7. Additional Information

Contact: For data protection queries or to object under Legitimate Interests, email privacyteam@organon.com. For general disclosure queries, please contact Organon UK compliance.