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Country: United Kingdom

CNX Therapeutics Limited

Methodological note for HCP and HCO disclosure 2025

Data year: 2025

Year of publication: 2026

CNX Therapeutics Limited is a speciality, European pharmaceutical dedicated mainly to the treatment of CNS disorders, critical care products and anti-infectives.

CNX Therapeutics Limited ("**CNX**" or the "**Company**") has prepared this document to outline the Company's interpretations and assumptions made and methodologies used in complying with the requirements to disclose payments to Healthcare Professionals (**HCPs**), Healthcare Organisations (**HCOs**) and Other Relevant Decision Makers (**ORDMs**) under the Code of Practice 2021 administered by the Prescription Medicines Code of Practice Authority (**PMCPA**) and the ABPI Code 2024 on disclosure of transfer of value from pharmaceutical companies to healthcare professionals and healthcare organisations adopted by the European Federation of Pharmaceutical Industries and Associations (**EFPIA**).

This document only applies to the Disclosures of Payments submitted by the Company for the corresponding year of this Methodological Note - subsequent documents related to future submissions may or may not include, at the discretion of the Company, changes and/or updated assumptions, interpretations and methodologies.

CNX has not paid any transfers of value to patient organisations for 2025.

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1 Definitions

1.1 Recipients

Healthcare Professional:

'**Healthcare professional**' includes any member of the medical, dental, pharmacy or nursing professions 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 the ABPI Code of Practice 2024), the term also includes any employee of a pharmaceutical company whose primary occupation is that of a practising health professional.

Healthcare Organisations:

'**Healthcare Organisation**' can mean 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. Where a healthcare organisation consists of only one healthcare professional or other relevant decision maker, it shall be subject to the requirements applicable to individual health professionals or other relevant decision makers.

Other Relevant Decision Makers:

'**Other relevant decision maker**' particularly includes someone 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 is not a health professional.

1.2 Kind of TOVs

Events:

Includes all professional, promotional, scientific and educational meetings, congresses, conferences, symposia, and other similar events (including, but not limited to, advisory board meetings, visits to research or manufacturing facilities, and planning, training or investigator meetings for clinical trials and non- interventional studies) organised or sponsored by or on behalf of a company.

Transfers of Value:

Direct and indirect Transfers of Value, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of Prescription Only Medicinal Products for human use. Direct Transfers of Value are those made directly by Company for the benefit of the Recipient. Indirect Transfers of Value are those made on behalf of the Company for the benefit of the Recipient, or Transfers of Value made through an intermediate and where the Company knows or can identify the HCP/HCO that will benefit from the Transfer of Value.

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 (*as defined in Clause 1.5 of the ABPI Code of Practice 2024*).

Sponsorship agreements with HCOs/third parties appointed by HCPs to manage an Event:

Support for a specific event, activity or item which is organised and or produced by, or for, a third party. This may include financial support, goods or services. Examples of activities sponsored by CNX in this way include: support for a speaker, rental of stand space.

Registration Fees for Events:

CNX supports the continuing medical education of HCPs/HCOs/ORDMs by providing occasional payment of registration fees for medical/scientific events organised by CNX or by a third party.

Travel and Accommodation for Events:

This subcategory relates to support in the form of payment of reasonable travel and accommodation when CNX supports the attendance of HCPs at medical/scientific events organised by third parties. Examples include airfares, train tickets, taxis, tolls, parking fees and hotel accommodation.

In certain circumstances CNX will reimburse expenses to attend CNX organised in person educational meetings, and these are disclosed as such.

Fees for contracted services:

Fees agreed in a formal contract paid to HCPs and ORDMs, or to their employees on their behalf for services rendered where there is legitimate business need. Examples include chairing and speaking at meetings, participation in advisory boards, training services, medical writing.

The 'Fee for service and contracted services' category will include transfers of value relating to Market Research if the identity of the HCP is known by CNX.

Related Expenses agreed in the fees for service contract:

Expenses paid to HCPs and ORDMs, or to their employees on their behalf in association with the provision of a contracted service as described above.

Collaborative Working:

Refers to pharmaceutical companies working with other organisations to deliver initiatives which either enhance patient care or are for the benefit of patients or alternatively benefit the National Health Service (NHS) and, as a minimum, maintain patient care (*as defined in Clause 1.3 of the ABPI Code of Practice 2024*). CNX has not engaged in collaborative working during 2025.

Disclosure's Scope

1.3 Products concerned

Any product marketed by CNX Therapeutics Limited.

1.4 Company concerned

CNX Therapeutics Limited, a company with registered company number, 03363032, incorporated in England and Wales, and with registered offices at 3 Bunhill Row, London, England, EC1Y 8YZ.

1.5 Excluded ToVs

Transfers of Value paid to patient organisations are disclosed separately on the CNX Therapeutics website.

1.6 ToVs date

Add the methodology used to determine the ToV date, for example payment date, invoice date, event date, or service completion date. Transfers of Value are recognised in the year in which payment is made by the Company to the recipient (payment date basis). Where a payment is made by invoice, the payment date is the date on which the payment is processed by the Company. In the event that a Transfer of Value spans more than one reporting year, it will be apportioned and disclosed in the year in which each payment is made. [Note to CNX to confirm the precise recognition rule before finalisation]

1.7 Direct ToVs

ToV disclosure is made on the ABPI disclosure template and submitted to the Disclosure UK database in line with the requirements of the ABPI Code 2024.

Individual disclosure is listed under ToV category and by HCP/ORDM name.

CNX does not allow for any "partial disclosure": HCPs and ORDMs can only consent to all not some of their ToVs being disclosed by CNX to the ABPI on an individually identifiable basis.

When an HCP/ORDM has declined individual disclosure, amounts are listed in the aggregated column.

Where a recipient provides consent for disclosure of some but not all of their Transfers of Value, or withdraws consent for one or more individual Transfers of Value, the Company will disclose all Transfers of Value for that individual in aggregate, in accordance with Clause 28.5 of the ABPI Code of Practice 2024.

HCO disclosure is listed by address and ToV category.

1.8 Indirect ToVs

Indirect Transfers of Value are disclosed where they are made on behalf of CNX, or through an intermediary, and where CNX knows or can identify the HCP, ORDM or HCO that ultimately benefits from the Transfer of Value. Where the recipient can be identified, the Transfer of Value is disclosed against that recipient in the relevant disclosure category.

1.9 Non-monetary ToVs

CNX has not identified any non-monetary Transfers of Value made to HCPs, ORDMs or HCOs during the reporting period.

1.10 ToVs in case of partial attendances or cancellation and refund

Only Transfers of Value received by the HCP, ORDM or HCO are reported. Where a recipient does not receive the benefit or payment due to non-attendance, cancellation or refund, associated unrecovered costs are not reported as a Transfer of Value to that recipient unless a cancellation fee or contractual payment is payable to the recipient.

Where an HCP/HCO does not receive the benefit/payment due to a no show or a cancellation of event, the associated costs are not reported, such as the cost of cancelling a hotel booking or accommodation. In case of partial attendance, only the benefits/payments actually received are reported.

Where CNX has to pay cancellation fees to HCP/HCOs as per service contracts, due to cancellation of events, these payments are reported.

If an HCP carries out work under a contract for a service that is subsequently cancelled, only the hours spent on the work are paid for and disclosed accordingly.

1.11 Cross-border activities

Not applicable

1.12 R&D

Not applicable

1.13 Voluntary disclosure

CNX does not make voluntary disclosures beyond those required by the applicable disclosure framework, except where CNX considers that disclosure is appropriate to support transparency and is consistent with applicable laws and regulations

2 Specific considerations

2.1 Country unique identifier

Where available and required, CNX uses relevant UK identifiers to support accurate recipient identification, including professional registration numbers for HCPs and registered organisation details for HCOs. Recipient names, addresses and other identifying information are reviewed to reduce the risk of duplicate or incorrect disclosure.

2.2 Self-incorporated HCP

Where an HCP/ ORDM runs a private company (where he/she is the only employee of the corporation), CNX discloses the transfer of value to the individual HCP/ORDM subject to consent being in place.

2.3 Multi-year agreements

Where contracts are valid for more than one year, each individual TOV is captured and disclosed in the reportable annual disclosure period.

2.4 Country specificities

Disclosures are prepared in accordance with the applicable ABPI Code requirements and submitted using the relevant UK disclosure template and platform.

2.5 Quality Checks

CNX has made reasonable efforts to validate all data included in the submission to ensure all data elements are collected, and that the data elements are current, accurate and complete including that they accurately reflect the interaction that took place.

3 Data protection legal basis

3.1 Consent collection

CNX seeks consent from HCPs and ORDMs for individual disclosure of Transfers of Value where consent is required. Consent is requested, recorded and retained through CNX's internal processes and/or relevant contractual documentation. Recipients may withdraw consent in accordance with applicable data protection requirements. Where consent for individual disclosure is not provided or is withdrawn before publication, the relevant Transfers of Value are disclosed in aggregate.

3.2 Legitimate interests

Where applicable, CNX may rely on legitimate interests as a legal basis for processing personal data necessary to meet transparency and disclosure obligations, provided such interests are not overridden by the rights and freedoms of the individual. CNX assesses the appropriate legal basis for disclosure in line with applicable data protection requirements.

4 Form of disclosure

4.1 Date of publication

The 2025 disclosure is intended to be published in 2026 in accordance with the applicable ABPI disclosure timelines. The final publication date will be confirmed in line with the relevant publication schedule.

4.2 Disclosure platform

ToV disclosure is made on the ABPI disclosure template and submitted to the Disclosure UK database in line with the requirements of the ABPI Code 2024.

4.3 Disclosure language

The disclosure and this methodological note are prepared in English.

5 Disclosure financial data

5.1 Currency

Payments are presented in GBP. For payments made for non-UK invoices the currency exchange rate to GBP on the first day of the month of payment is used.

The Company uses solely monetary transfers of value: cash or cash equivalent.

5.2 VAT included or excluded

The Company reports payments free of Value Added Tax or any other applicable taxes.

5.3 Calculation rules

Reported values are calculated using the amount paid or reimbursed by CNX, excluding VAT or other applicable taxes. Amounts are reported in GBP. Where a payment is made in another currency, the value is converted into GBP using the exchange rate applied by CNX at the first day of the month of payment. Shared costs are allocated to the relevant recipient where this can be reasonably determined; otherwise, they are treated in accordance with the applicable disclosure category and aggregation rules.

6 Additional Information

Dispute Resolution

The Company will attempt to resolve disputes with recipients. Upon notification that a dispute has been initiated, the Company will review and attempt to resolve each dispute on an individual basis. If a resolution cannot be reached, the reported Transfer of Value will be moved into the aggregate section of the database.