

# Pharmanovia: Methodological note for HCP/ORDM/HCO disclosure 2025

Data year: 2025

Year of publication: 2026

The disclosure covers all Transfers of Value required to be disclosed pursuant to the ABPI Code of Practice which have been made by Pharmanovia and its affiliates during the Period covered to Healthcare Professionals, Healthcare Organisations and/or Patient Organisations.

## Contents

<b>1</b>	<b>Definitions</b> .....	<b>2</b>
1.1	Recipients .....	2
1.2	Kind of ToVs .....	2
<b>2</b>	<b>Disclosure's Scope</b> .....	<b>3</b>
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 .....	4
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
<b>3</b>	<b>Specific considerations</b> .....	<b>4</b>
3.1	Country unique identifier .....	4
3.2	Self-incorporated HCP .....	5
3.3	Multi-year agreements .....	5
3.4	Country specificities .....	5
3.5	Quality Checks .....	5
<b>4</b>	<b>Data protection legal basis</b> .....	<b>5</b>
4.1	Consent collection .....	5

4.2	Legitimate interests .....	5
5	<b>Form of disclosure</b> .....	6
5.1	Date of publication .....	6
5.2	Disclosure platform .....	6
5.3	Disclosure language.....	6
6	<b>Disclosure financial data</b> .....	6
6.1	Currency .....	6
6.2	VAT included or excluded.....	6
6.3	Calculation rules.....	6
7	<b>Additional Information</b> .....	6

# 1 Definitions

## 1.1 Recipients

**Healthcare Organisation** is any entity (i) that is a healthcare, medical or scientific association or organisation (irrespective of the legal or organisational form) such as a hospital, clinic, foundation, university or other teaching institution or learned society or (ii) through which one or more Healthcare Professionals provide healthcare services. For the avoidance of doubt, wholesalers, distributors, and similar commercial intermediaries are not considered Healthcare Organisations.

**Healthcare Professional** means someone who: (i) is a member of the medical, dental, pharmacy or nursing professions; and/or (ii) is able, in the course of his or her professional activities, to prescribe, recommend, purchase, supply and/or administer medicinal products.

**Patient Organisation** is a not-for-profit organisation which is patient-focused, and in which patients or their carers represent a majority of members in its governing bodies.

## 1.2 Kind of ToVs

**Transfer of Value** is a transfer of value made directly or indirectly by Atnahs for the benefit of a Healthcare Professional or a Healthcare or Patient Organisation. A Transfer of Value can include anything of value, including monetary payments or in-kind benefits, such as meals, travels, accommodation, etc.

The following definitions are provided as per the ABPI Code of Practice:

**Donations and Grants:** Are 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.

**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.

**Contribution to Cost of Events:** 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).

**Contracted Service Fees:** Health professionals, other relevant decision makers or their employers on their behalf, healthcare organisations, patient organisations, individuals representing patient organisations, and members of the public, including patients and journalists, may be used as consultants and advisors, whether in groups or individually, for services such as speaking at and chairing meetings, involvement in medical/scientific studies, clinical trials or training services, writing articles and/or publications, participation at advisory board meetings, and participation in market research where such participation may involve remuneration and/or hospitality.

**Research and Development:** means, for the purposes of disclosure, transfers of value to health professionals or healthcare organisations related to the planning or conduct of:

- i. non-clinical studies (as defined in the OECD Principles of Good Laboratory Practice)
- ii. clinical trials (as defined in Regulation 536/2014)
- iii. non-interventional studies that are prospective in nature and that involve the collection of patient data from or on behalf of individual.

**Sponsorship:** means a contribution, financial or otherwise, in whole or in part provided by or on behalf of a company, towards an activity (including an event/meeting or material) performed, organised, created, etc. by a healthcare organisation, patient organisation or other independent organisation.

## 2 Disclosure's Scope

### 2.1 Products concerned

Prescription-only medications.

### 2.2 Company concerned

Pharmanovia.

### 2.3 Excluded ToVs

Not Applicable.

### 2.4 ToVs date

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

### 2.5 Direct ToVs

A direct transfer of value is one made directly by Pharmanovia for the benefit of a recipient. Examples include contracted fees for services and sponsorship.

## **2.6 Indirect ToVs**

An indirect transfer of value is one made on behalf of a company 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. Not applicable in this disclosure period..

## **2.7 Non-monetary ToVs**

A non-monetary transfer of value refers to incentives, benefits, or support which does not involve direct cash payment. Examples include: Promotional aids, educational materials and training services. Not applicable in this disclosure period.

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

Not Applicable.

## **2.9 Cross-border activities**

Cross-border transfers of value were managed through a centralised compliance framework designed to ensure transparency, regulatory alignment, and accurate reporting across jurisdictions.

When a HCP/HCO received a transfer of value from an affiliate located in a country different from the HCP's primary country of practice, the payment was flagged as a cross-border transaction within Pharmanovia's financial reporting platform.

Each transfer was assessed to determine the appropriate country of disclosure, typically the country where the HCO/HCP has their principal practice, in accordance with applicable industry codes and local transparency regulations. The originating affiliate remained responsible for capturing the full details of the engagement, including the nature of the service, contractual documentation, payment value, currency, and date of transfer.

In this disclosure period a cross-border activity was conducted by Pharmanovia Benelux B.V.

## **2.10 R&D**

Not Applicable.

## **2.11 Voluntary disclosure**

Not Applicable.

# **3 Specific considerations**

## **3.1 Country unique identifier**

Pharmanovia does not submit professional identifiers (e.g. GMC number) to Disclosure UK. Only the name of the HCP/HCO is submitted where applicable as per the contractual agreement.

### **3.2 Self-incorporated HCP**

Where a Healthcare Professional provides services through their own Limited Company or other legal entity, the transfer of value is disclosed in accordance with the principles set out in the ABPI Code of Practice.

If the payment is made to the HCP's Limited Company but the services are clearly attributable to an identifiable HCP, the transfer of value is disclosed in the name of the individual Healthcare Professional, provided that the individual can be identified as the ultimate beneficiary of the engagement.

Where the payment is made to a legal entity and the services are contracted with that entity rather than the individual, the transfer of value may be disclosed in the name of the legal entity.

Pharmanovia assesses each engagement to determine whether the payment should be disclosed against the individual HCP or the legal entity, taking into account the contractual party and the recipient of the payment..

### **3.3 Multi-year agreements**

Transfers of value for multi-year agreements are disclosed on an annual basis. Only the fees accrued in that year are published.

### **3.4 Country specificities**

Not Applicable.

### **3.5 Quality Checks**

Contractual records of transfers of value to HCPs/HCOs are checked thrice to ensure no payments are missed. These are then aligned with payment data on Pharmanovia's financial reporting platform. The disclosure excel template is complete and submitted to pre-disclosure at regular intervals to ensure integrity of the document.

## **4 Data protection legal basis**

### **4.1 Consent collection**

Consent is managed in the contractual agreements with HCPs/HCOs.

If consent required under applicable data privacy laws and regulations has not been given by the data subject to Atnahs (or if Atnahs might have difficulties in proving such consent), the Transfer of Value is disclosed on an anonymous basis. Where consent is not available or cannot be demonstrated, Transfers of Value are disclosed on an aggregated basis in accordance with ABPI requirements. If the majority of Healthcare Professionals have not given the relevant consent (or such consent is difficult to prove), Transfers of Value are disclosed on aggregate level only.

### **4.2 Legitimate interests**

Not Applicable.

## 5 Form of disclosure

### 5.1 Date of publication

[30/06/2026

### 5.2 Disclosure platform

Disclosure UK – [www.disclosureuk.org.uk](http://www.disclosureuk.org.uk)

### 5.3 Disclosure language

English.

## 6 Disclosure financial data

### 6.1 Currency

GBP.

Other currencies and exchange rates are not applicable for this disclosure period.

### 6.2 VAT included or excluded

Disclosed amounts include VAT and any other applicable taxes, where applicable..

### 6.3 Calculation rules

Not applicable; no non-monetary or in-kind ToVs.

## 7 Additional Information

**Transfers of Value made to Patient Organisations:** Atnahs discloses the amounts attributable to the following Transfer of Values which can be reasonably allocated to Patient Organizations, on an individual, named basis: (i) financial and in-kind support; and (ii) fees for services, including a description of the nature of the Transfer of Value and the amount provided. These are published on the Pharmanovia website and accessible via gateway link on Disclosure UK.]