

Zambon UK: Methodological note for HCP/ORDM/HCO disclosure 2025

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Zambon UK Ltd is committed to transparency and discloses transfers of value (ToV) to healthcare professionals, other relevant decision makers and healthcare organisations in line with the ABPI Code of Practice and EFPIA Code on Disclosure of Transfers of Value from Pharmaceutical Companies to Healthcare Professionals and Healthcare Organisations. Zambon UK has followed the document “Guidance on the Methodological Note for Annual Disclosure of Transfers of Value to Health Professionals, Other Relevant Decision Makers and Healthcare Organisations”

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1 Definitions

1.1 Recipients

‘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 a company for the benefit of a recipient. 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.

For the purposes of this disclosure, recipients include:

‘Healthcare organisation’ (HCO) 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.

‘Health 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), the term also includes any employee of a pharmaceutical company whose primary occupation is that of a practicing health professional.

‘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.

‘Research and development transfers of value’ means 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 or groups of health professionals specifically for the study.

Where a health professional or other relevant decision maker has retired, disclosure will still be made on a named basis where Zambon UK has consent. If Zambon UK is made aware that they have deceased, it will disclose the figures in aggregate.

To the best of its knowledge, Zambon UK has made no transfers of value to individuals that have retired or deceased in 2025.

1.2 Kind of ToVs

Research and development (R&D) disclosures

ToVs related to the planning or conduct of non-clinical studies, clinical trials and non-interventional that are prospective in nature are considered R&D ToVs and are reported on an aggregate basis, whether paid directly or indirectly through third parties and clinical research organisations.

HCP and ORDM disclosures include:

- a) Support to attend an event/meeting (e.g. congresses)

Financial contributions paid towards the cost of registration fees and/or travel/accommodation, in whole or in part, for HCPs to attend independent bona fide meetings which were deemed to have educational value.

Where there has been a request for both categories and Zambon UK does not provide support in full, the transfer of value will be split between registration fees and travel/accommodation.

- b) Contracted services

Amount paid for genuine services such as participation in advisory boards or speaking at meetings. Fees and expenses have been disclosed as two separate amounts, under the 'Fees' and 'Expenses' category. Examples of expenses include the cost of accommodation or travel (e.g. flight, taxi, rail fare, mileage etc).

In exceptional circumstances where Zambon agrees to pay an individual's fee to a charity, the ToV will nonetheless be disclosed against the individual.

HCO disclosures include:

- a) Sponsorship (e.g. congress and educational events)

Contributions to HCOs including medical associations in exchange for a tangible benefit in return such as an exhibition stand, a slot in the agenda or corporate advertising.

Sponsorship means a contribution, financial or otherwise, in whole or in part towards an activity (including an event/meeting or material). If sponsorship is provided, for example, by means of the provision of catering, this will be disclosed.

b) 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.

Charitable donations made to organisations which relate to a therapy area it has a commercial interest in shall be disclosed. Other charitable donations will fall out of scope of disclosure.

Zambon UK made no donations and grants in 2025.

c) Collaborative working

Collaborative working is 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. Joint working is a limited form of collaborative working.

Zambon UK did not engage in any collaborative working projects in 2025.

d) Fees

Zambon UK will disclose payments made to a healthcare organisation for fees that do not fall within the other categories. This may include consultancy services involving its employees where, to its knowledge, the individual does not receive any payment or benefit for that particular service. However, where an expense related to the contract service is attributable to an individual, this will be disclosed against the HCP/ORDM.

If a HCO consists of only one person, this will be treated as the individual HCP/ORDM delivering the service for disclosure purposes in accordance with the ABPI Code of Practice.

Package deals

The annual treatment cost of one of Zambon's medicines included the supply and ongoing maintenance of a device required for its product, along with enrolment into a patient support programme which includes a nurse service delivered by a third-party HCO.

The provision of the device is required for the administration of the medicine and is therefore considered an ordinary course purchase, with the cost being exempt from disclosure.

However, the patient support programme / service which forms part of a package deal is considered disclosable. Zambon is unable to identify the end

beneficiaries of the service and ToV is therefore disclosed against the third-party HCO as a fee for service.

N.B. this medicine was discontinued in 2025 and the provision of the package deal ceased at the end of 2025.

2 Disclosure's Scope

2.1 Products concerned

[Prescription Only Medicines (POMs).

There are no disclosures related to medical devices or over-the-counter medicines.

2.2 Company concerned

Zambon discloses transfers of values based on the principal place of practice. Therefore, this disclosure by Zambon UK covers transfers of value made by members of the Zambon group, including other entities and affiliates, to HCPs, ORDMs and HCOs based in the UK. There were no company name changes or mergers affecting disclosure comparability during the reporting period.

2.3 Excluded ToVs

Transfers of value that are excluded from disclosure include:

- Transfers relating solely to food and drink (subsistence), except where included as part of an overall sponsorship payment to a HCO
- Items for patient support
- Market research activities where Zambon UK does not know the identity of individual participants
- Ordinary course purchases as part of a commercial arrangement
- Charitable donations to UK charities unrelated to the therapy areas Zambon UK operates in

2.4 ToVs date

For reporting date purposes, Zambon UK distinguishes between monetary and non-monetary transfers of value:

Monetary transfers of value: these are reported based on the actual payment date, irrespective of when the activity took place.

Non-monetary transfers of value: reported based on the date the benefit was received.

2.5 Direct ToVs

A direct transfer of value (monetary or non-monetary) is where a benefit is received directly by the recipient such as a fee for service being paid directly into their bank account.

2.6 Indirect ToVs

An indirect transfer of value (monetary or non-monetary) is where a benefit is received by a third party on behalf of the beneficiary who can be identified.

For example, a third-party agency may be appointed to make travel/accommodation arrangements or make a contracted service fee payment on behalf of Zambon UK. In these instances, the ToV will be disclosed against the health professional or other relevant decision maker that is the end beneficiary. Administration fees will not be disclosed unless these are expressly separated and not included within the cost of travel or accommodation.

Note this is different to where payments are made to healthcare organisations involving its employees where, to Zambon UK's knowledge, the individual does not receive any payment or benefit for the service.

2.7 Non-monetary ToVs

A non-monetary ToV is where a benefit is received directly or indirectly by the recipient which is not a monetary payment. Examples may include staff time, equipment etc. For non-monetary transfers of value, a value will be calculated and attributed to the benefit received.

There were no non-monetary ToVs in 2025.

2.8 ToVs in case of partial attendances or cancellation and refund

Where disclosable activities do not take place or are cancelled, these are not disclosed as there is no benefit to disclose. Partial attendances will be disclosed. Where (partial) refunds are obtained, the disclosed value is adjusted accordingly.

2.9 Cross-border activities

Transfers of value are disclosed in the country where the recipient primarily practises or where the HCO is located. This disclosure includes transfers made to UK-based HCPs or HCOs by Zambon group affiliates outside the UK. Disclosable figures are provided by Zambon headquarters.

2.10 R&D

ToVs related to the planning or conduct of non-clinical studies, clinical trials and non-interventional studies that are prospective in nature are considered R&D ToVs and are reported on an aggregate basis, whether paid directly or indirectly through third parties and clinical research organisations.

2.11 Voluntary disclosure

There are no voluntary disclosures beyond those required by the ABPI Code of Practice.

3 Specific considerations

3.1 Country unique identifier

No commercial unique identifiers are used. Individuals are identified by name and principal practicing address.

3.2 Self-incorporated HCP

For organisations with a single health professional, such as a health professional that is a sole director of a limited company, transfers of value will be disclosed against the individual.

3.3 Multi-year agreements

For multi-year agreements, only transfers of value paid within the reporting year are disclosed in this publication. Where the transfer is a benefit in kind, this shall be reported in the reporting year that the benefit was received.

3.4 Country specificities

Any collaborative working summaries will be posted on the disclosure section of the zambonpharma.com UK website.

3.5 Quality Checks

Zambon UK conducted internal quality checks prior to submission to ensure the accuracy, completeness, and consistency of the disclosed data. All payments reported originated

from Zambon's trackers and approval system which have been checked against all payments made in 2025. All transfers made by Zambon SpA, Zambon Biotech and other member of Zambon Group to UK individuals and/or HCOs have been provided by the relevant affiliate representative for disclosure in the UK. These have been reconciled against compliance approval documentation for such engagements.

4 Data protection legal basis

4.1 Consent collection

Zambon is committed to support transparency and abides by data privacy law.

Zambon continues to encourage and seek explicit consent from individuals prior to disclosing ToVs. Consent applies to all activities undertaken in the disclosure year and is reviewed regularly. Where consent was not obtained, ToVs have been disclosed as aggregate figures within the relevant disclosure category.

Zambon UK's approach for individual consent is 'all in' or 'all out' so as not to mislead to the true transfer of value. Zambon UK will not report partial transactions. All spend per individual will be reported at the individual level or in aggregate.

Consent is not required for disclosure against healthcare organisations

4.2 Legitimate interests

N.A. – Zambon UK relies upon consent

5 Form of disclosure

5.1 Date of publication

31 March 2026

5.2 Disclosure platform

Disclosure UK – www.disclosureuk.org.uk

5.3 Disclosure language

English

6 Disclosure financial data

6.1 Currency

GBP (Great British Pound)

Where payments were made in a currency other than GBP sterling, the amount will be calculated using the Official December HMRC foreign currency exchange average yearly rates for the reporting year.

For example, the HMRC yearly average Euro exchange rate for 2025 used was €1.1717 per £1.

6.2 VAT included or excluded

All transfers of value are disclosed exclusive of VAT and for international payments, net of local taxes where applicable. The exception to this is taxes for flights.

In some instances, for indirect transfers of value, VAT may not be separable, and in these cases, some VAT may have been included in the disclosure amount.

6.3 Calculation rules

Disclosure values are calculated and then rounded to the nearest GBP.

In the event one ToV covers multiple recipients, it will be split equally across each.

7 Additional Information

Zambon UK is not party to any co-promotion agreements