



## PAION UK Ltd. and PAION Pharma GmbH Methodology Statement 2025

### 1. Definitions

#### 1.1. Recipients

PAION UK Ltd. and PAION Pharma GmbH discloses Transfers of Value (ToVs) to Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs), and Healthcare Organisations (HCOs) in accordance with the ABPI Code. Retired HCPs and ORDMs are included where activities relate to their professional expertise. Data relating to deceased recipients is managed in accordance with applicable legal and data privacy obligations.

#### 1.2. Kind of ToVs

The following categories of ToVs may be disclosed where applicable: donations and grants, sponsorship agreements, contributions to costs of events (registration fees, travel and/or accommodation), fees for service and consultancy, consultancy-related expenses, collaborative working activities, and Research and Development (R&D) ToVs.

### 2. Disclosure Scope

#### 2.1. Products concerned

The disclosure covers ToVs associated with prescription-only medicines. Transfers solely related to over-the-counter medicines or standalone medical devices are not included unless required by the ABPI Code.

#### 2.2. Company concerned

This disclosure relates to activities undertaken by PAION UK Ltd. and PAION Pharma GmbH and any applicable affiliates or third parties acting on its behalf in relation to UK disclosure obligations.

#### 2.3. Excluded ToVs

Excluded ToVs are hospitality (meals and drinks), educational materials, donations to charitable organisations and Patient Organisations, samples, and items of medical utility where exempt under the ABPI Code.

#### 2.4. ToVs date

The reporting period is 1 January 2025 to 31 December 2025.

#### 2.5. Direct ToVs

Direct ToVs include direct payments made by PAION UK Ltd. and PAION Pharma GmbH to HCPs, ORDMs, and HCOs for consultancy, travel, event sponsorship, or grants.

#### 2.6. Indirect ToVs

Indirect ToVs include transfers made through third-party vendors, agencies, congress organisers, or travel agencies acting on behalf of PAION UK Ltd. and PAION Pharma GmbH.

#### 2.7. Non-monetary ToVs

Non-monetary ToVs may include benefits in kind, sponsored attendance, or support provided through services or resources.



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

Where an event is partially attended, cancelled, or refunded, disclosure is based on costs actually incurred and not subsequently recovered.

### **2.9. Cross-border activities**

ToVs relating to UK recipients are disclosed in the UK regardless of which PAION UK Ltd. and PAION Pharma GmbH entity funded the activity. Cross-border disclosures are managed in line with local transparency requirements.

### **2.10. R&D**

R&D ToVs to HCPs or HCOs are disclosed on an aggregate basis and may include clinical trials, non-interventional studies, investigator meetings, and associated research activities consistent with the ABPI Code definition of R&D.

### **2.11. Voluntary disclosure**

PAION UK Ltd. and PAION Pharma GmbH does not currently make voluntary disclosures beyond those required by the ABPI Code unless otherwise specified.

## **3. Specific Considerations**

### **3.1. Country unique identifier**

PAION UK Ltd. and PAION Pharma GmbH may use internal or commercially available identifiers to support accurate data reconciliation and disclosure processes. Professional registration numbers are not published on Disclosure UK.

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

Where services are provided through a self-incorporated entity or limited company, disclosure categorisation is determined in accordance with the ABPI Code definitions and applicable contractual arrangements.

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

For agreements spanning multiple reporting periods, ToVs are disclosed in the year in which payment is made or the benefit is provided. Therefore, ToVs related to multi-year agreements will be split over several years.

### **3.4. Country specificities**

Where activities involve collaboration with other pharmaceutical companies, each party is responsible for disclosing its respective proportion of relevant ToVs. Collaborative working disclosures are managed according to applicable UK requirements.

### **3.5. Quality Checks**

Prior to submission, PAION UK Ltd. and PAION Pharma GmbH undertakes internal review and reconciliation checks for ToVs made to HCPs, ORDMs, HCOs and Pos to support data completeness and disclosure accuracy.

## **4. Data protection legal basis**

### **4.1. Consent collection**

PAION UK Ltd. and PAION Pharma GmbH seek to ensure that disclosures are managed in accordance with UK data protection legislation and applicable ABPI requirements. Where consent



is relied upon, recipients may withdraw consent in accordance with applicable legal provisions; see Legitimate Interests, below.

#### **4.2. Legitimate interests**

Since Jan 2023 PAION UK Ltd. and PAION Pharma GmbH has adopted Legitimate Interest as the lawful basis for processing data for disclosure purposes. Unlike with consent, under legitimate interest individuals can no longer "opt out" of processing (including disclosure). They do have the right to object to processing activity, and PAION UK Ltd. and PAION Pharma GmbH must consider any reasons put forward and balance them against X and Y's legitimate interests. To object, an HCP should email [infoUK@PAION.com](mailto:infoUK@PAION.com) explaining the reason why any data cannot be processed. Each objection will be reviewed by PAION UK Ltd. and PAION Pharma GmbH and a decision taken; the HCP will be informed of the decision.

### **5. Form of disclosure**

#### **5.1. Date of publication**

ToVs are reported for one calendar year and disclosed in June of the following year.

#### **5.2. Disclosure platform**

Reports are available on the ABPI's Disclosure UK platform.

#### **5.3. Disclosure language**

English

### **6. Disclosure financial data**

#### **6.1. Currency**

All amounts are disclosed in GBP. Where payments are made in another currency, amounts are converted using the applicable exchange rate at the time of processing or payment.

#### **6.2. VAT included or excluded**

Amounts are generally disclosed exclusive of VAT where this can be separately identified. Where VAT cannot be separated, the disclosed amount may include VAT.

#### **6.3. Calculation rules**

Calculation methodologies for non-monetary or in-kind ToVs are based on the fair market value or actual cost incurred by PAION UK Ltd. and PAION Pharma GmbH.

### **7. Additional Information**

This methodological note has been updated to align with the standardised methodological note structure introduced under EFPIA-aligned requirements applicable to 2025 transfers of value reported in 2026 onward.