

Neuraxpharm: Methodological note for HCP/ORDM/HCO disclosure 2026

Data year: 2025

Year of publication: 2026

Transparency is fundamental to ensure a positive working relationship between the pharmaceutical industry and healthcare providers, relationships that best serve the interests of patients. Neuraxpharm (Neuraxpharm 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) and Healthcare Organisations (HCOs) under the Code of Practice 2024 administered by the Prescription Medicines Code of Practice Authority (PMCPA).

Contents

1	Definitions	2
1.1	Recipients	2
1.2	Kind of ToVs	2
2	Disclosure’s Scope	2
2.1	Products concerned	2
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	3
2.8	ToVs in case of partial attendances or cancellation and refund	3
2.9	Cross-border activities	3
2.10	R&D	3

2.11	Voluntary disclosure.....	3
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.....	4
4.1	Consent collection.....	4
4.2	Legitimate interests.....	4
5	Form of disclosure.....	4
5.1	Date of publication.....	4
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

1 Definitions

1.1 Recipients

Neuraxpharm will consider the recipient to be the contracting entity. Hence the contracting party as stated on the legal contract executed between Neuraxpharm and the counterpart will be reported as the recipient.

1.2 Kind of ToVs

The ToVs data is based on any direct or indirect ToV, whether monetary, benefit in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and/or sale of prescription only medicinal products for human use.

2 Disclosure's Scope

2.1 Products concerned

Prescription only medicines

2.2 Company concerned

[Neuraxpharm]

2.3 Excluded ToVs

[Not applicable]

2.4 ToVs date

[January 2025 to December 2025]

2.5 Direct ToVs

[A ToV can be salary, fee or remuneration for a service provided by the HCP or HCO to Neuraxpharm. Expenses incurred during the execution of the service (e.g. travel and accommodation) are also considered ToV. Donations and sponsorships provided by Neuraxpharm are also considered to be ToV.

This includes, but is not limited to, payments of fees for services, consultancy and associated expenses, registration fees, sponsorships, grants, donations, travel, accommodation.

Examples of Transfers of Value covered under Fee for Service and Consultancy agreements:

- Speaker fees
- Webinar Faculty
- Development of case studies
- General consulting/advising
- Chairing and speaking at meetings]

2.6 Indirect ToVs

[Indirect ToVs would be via a third-party organiser.]

2.7 Non-monetary ToVs

[Not applicable]

2.8 ToVs in case of partial attendances or cancellation and refund

[Not applicable]

2.9 Cross-border activities

[Not applicable]

2.10 R&D

[Not applicable]

2.11 Voluntary disclosure

[Not applicable]

3 Specific considerations

3.1 Country unique identifier

[Not applicable]

3.2 Self-incorporated HCP

[Not applicable]

3.3 Multi-year agreements

[Not applicable]

3.4 Country specificities

[Not applicable]

3.5 Quality Checks

[Neuraxpharm has made reasonable efforts to ensure the completeness and accuracy of the ToVs made between individual HCPs and HCOs by reviewing relevant documentation including contracts and invoices.]

4 Data protection legal basis

4.1 Consent collection

[Neuraxpharm has sought consent from all HCPs to disclose ToVs on an individual basis, naming the recipient and identifying the ToV. For each activity, consent to disclose is requested at the inception of a HCP agreeing to provide services for the Company. This consent is stored electronically allowing a review of records if required in the future.

Should a HCP have provided consent for one meeting and not for another, all interactions with the HCP would have been included in the aggregate value and no partial disclosures made.

In circumstances where a HCP declines to give, or subsequently withdraws consent to disclose on an individual basis of ToV during the reporting calendar year all ToVs with no consent to disclose are included in the aggregate value.

In the case of HCOs, no consent is required to disclose ToVs against a named organisation in the UK. If more than one interaction occurred between Neuraxpharm and an HCO the ToVs are included as an aggregated value for the named organisation.]

4.2 Legitimate interests

[Not applicable]

5 Form of disclosure

5.1 Date of publication

[30/06/26]

5.2 Disclosure platform

[Disclosure UK – www.disclosureuk.org.uk]

5.3 Disclosure language

[English]

6 Disclosure financial data

6.1 Currency

[GBP]

6.2 VAT included or excluded

[The Company has made its disclosures relating to direct ToVs exclusive of all applicable taxes including VAT.]

6.3 Calculation rules

[Not applicable]

7 Additional Information

[The Company has made its disclosures relating to when the engagement with the HCP, ORDM or HCO occurred rather than when the cash payments were made. That is, if the engagement occurred in 2025 the ToV will be registered on the 2025 listing even if it was not paid until 2026.]