



**Alimera Sciences Ltd**

**Methodological Note for HCP/ORDM/HCO Disclosure 2025**

**Data year: 2025**

**Year of publication: 2026**

**Country: United Kingdom**

Alimera Sciences Ltd engages with Healthcare Professionals, Other Relevant Decision Makers and Healthcare Organisations to support research, education and patient care. Transfers of Value arising from these interactions are disclosed in accordance with the ABPI Code.

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## **1. Definitions**

### **1.1. Recipients**

Recipients include:

- Healthcare Professionals (HCPs)
- Other Relevant Decision Makers (ORDMs)
- Healthcare Organisations (HCOs).

Definitions are aligned with the ABPI Code of Practice (2021).

### **1.2. Kind of ToVs**

Transfers of Value (ToVs) include:

- Contracted services (e.g. advisory boards, speaking engagements)
- Support for attendance (e.g. travel, accommodation, registration fees)
- Donations and grants to HCOs
- Research and Development (R&D) payments (aggregated)

## **2. Disclosure's Scope**

### **2.1. Products concerned**

All prescription-only medicines (ILUVIEN<sup>®</sup>) marketed by Alimera Sciences Ltd in the UK are within scope.

### **2.2. Company concerned**

This disclosure covers Alimera Sciences Ltd, United Kingdom.

### **2.3. Excluded ToVs**

The following are excluded: -

- OTC products
- Medical devices
- Non-relevant transactions outside scope of the ABPI Code

### **2.4. ToVs date**

ToVs are reported in the year in which payment is made.

## **2.5. Direct ToVs**

Direct ToVs are payments made directly by Alimera Sciences Ltd to HCPs, ORDMs, or HCOs.

## **2.6. Indirect ToVs**

Indirect ToVs are payments made via third parties (e.g. CROs, event agencies) on behalf of Alimera Sciences Ltd. Such ToVs are captured, validated, and disclosed where required.

## **2.7. Non-monetary ToVs**

Not applicable. No non-monetary ToVs were provided during the reporting period.

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

Where events are partially attended or cancelled, only costs actually incurred by Alimera Sciences Ltd are disclosed. Refunds are accounted for where applicable.

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

No cross-border payments to UK recipients occurred during 2025.

## **2.10. R&D**

R&D ToVs are disclosed in aggregate in accordance with ABPI requirements.

## **2.11. Voluntary disclosure**

Alimera Sciences Ltd discloses ToVs under legitimate interests. Where individual disclosure is not possible, data is reported in aggregate where required.

## **3. Specific considerations**

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

Recipients are identified using available identifiers in line with ABPI requirements.

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

Where an HCP operates via a personal company, ToVs are disclosed to the individual where required by the ABPI Code.

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

Not applicable. No multi-year agreements were employed during 2025.

### **3.4. Country specificities**

Where an HCP is employed by Alimera and also practices in the NHS, only NHS-related ToVs are disclosed.

### **3.5. Quality Checks**

Data quality is ensured through:

- Pre-approval of all activities and spend
- Verification of contractual basis
- Finance reconciliation against approved budgets
- Secondary documented review of ToV categorisation
- Segregation of duties between data entry, validation, and approval
- Validation and reconciliation of third-party data

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

### **4.1. Consent collection**

Not applicable. Alimera Sciences Ltd does not rely on consent as the primary legal basis for disclosure.

### **4.2. Legitimate interests**

Personal data is processed under Article 6(1)(f) UK GDPR. A Legitimate Interest Assessment confirms that:

- Processing is necessary for transparency obligations
- Data is limited to identification and financial information
- Safeguards are in place
- Data subjects are informed of their rights, including the right to object

## **5. Form of disclosure**

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

Disclosure is published annually in line with ABPI timelines.

### **5.2. Disclosure platform**

Disclosure UK ([www.disclosureuk.org.uk](http://www.disclosureuk.org.uk)), the central platform operated by the ABPI.

### **5.3. Disclosure language**

Disclosures are made in English.

## **6. Disclosure financial data**

### **6.1. Currency**

All ToVs are reported in GBP.

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

All ToVs are reported exclusive of VAT.

### **6.3. Calculation rules**

- Payments to the same recipient within the same category are aggregated
- Currency conversions are applied at the exchange rate at time of payment
- Only actual costs incurred are disclosed
- Data is consolidated using controlled spreadsheet processes with validation checks

## **7. Additional Information**

### **7.1. Systems and Data Sources**

ToV data is captured through:

- Electronic contract management systems
- Finance systems
- Controlled project-level tracking spreadsheets

### **7.2. Audit and Record Keeping**

- Records are retained in accordance with ABPI requirements (minimum 5 years)
- Audit trails are maintained across approval, payment, and aggregation stages
- Post-submission corrections follow controlled processes
- March 2026

### **7.3. Date of Preparation**

- March 2026