

VISUfarma Methodological note for HCP/ORDM/HCO disclosure 2025

Data year: 2025

Year of publication: 2026

The following methodological notes have been provided by VISUfarma UK Ltd (VISUfarma) for the year of 2025.

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Definitions

Recipients

Recipients include:

- 
Healthcare Professionals (HCPs): members of the medical, pharmacy or nursing professions and any other persons who may prescribe, purchase, supply, recommend or administer a medicine in the UK.
- 
Other Relevant Decision Makers (ORDMs): individuals who are involved in decision-making processes related to prescribing or use of medicines but who are not HCPs. Although this isn't relevant to this year's submission, these are also a consideration of our Disclosure process.
- 
Healthcare Organisations (HCOs): legal entities such as hospitals, clinics, universities, learned societies, and other healthcare-related institutions.

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Transfers of Value (ToVs) to retired HCPs or ORDMs are disclosed where they meet the definition of recipient under the Code.

In the case of deceased recipients, VISUfarma will follow applicable PMCPA guidance and UK data protection requirements; where appropriate, disclosures are made in a manner compliant with legal obligations. As such, this isn't relevant to 2025's data submission.

Kind of ToVs

ToVs include all travel, accommodation, registration and service/consultancy fees or other related costs including sponsorship to educational events for the continued educational benefit of the HCP.

- 🔥 Donations and grants to HCOs
- 🔥 Contributions to costs of events (e.g. sponsorship, registration fees, travel, accommodation)
- 🔥 Fees for service and consultancy (e.g. advisory boards, speaker engagements)
- 🔥 Related expenses (e.g. travel and accommodation linked to services) (where applicable)
- 🔥 Collaborative working (where applicable)

There are no Research and Development (R&D) ToVs to declare for VISUfarma during the 2025 period.

Disclosure's Scope

Products concerned

Disclosures relate to prescription-only medicines marketed or distributed by VISUfarma in the United Kingdom.

ToVs related exclusively to over-the-counter medicines or non-medicinal products are not included unless they are associated with activities involving prescription medicines. This also includes such cases where a HCP has been paid for services/offered sponsorship in association with VISUfarma's medical device range, where such HCPs may be applicable to also prescribe or have any influence over VISUfarma's prescription only medication products.

Company concerned

This disclosure covers VISUfarma UK.

No subsidiaries or affiliated entities are included within this disclosure.

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Excluded ToVs

The following are excluded in accordance with the ABPI Code:

- Transfers of Value solely related to over-the-counter medicines, where said HCPs/HCOs have no influence over POMs
- Meals and drinks below the disclosure threshold
- Transfers not meeting the definition of a ToV under the Code

ToVs date

Transfers of Value are reported based on the date of payment or when the activity took place, within the reporting period of 1 January 2025 to 31 December 2025.

Direct ToVs

Direct ToVs are payments made directly by VISUfarma to recipients, including:

- Consultancy fees
- Speaker fees
- Direct sponsorship of event attendance

Indirect ToVs

Indirect ToVs are payments made via third parties on behalf of VISUfarma, including:

- Payments to event organisers managing HCP participation
- Third-party agencies arranging consultancy or advisory services

Non-monetary ToVs

N/A

ToVs in case of partial attendances or cancellation and refund

Where an HCP partially attends an event, the ToV is disclosed proportionally where feasible.

In cases of cancellation:

- 🔥 Non-refundable costs incurred by VISUfarma are disclosed where attributable to the recipient
- 🔥 Fully refunded amounts are not disclosed

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Cross-border activities

ToVs related to UK-based and ROI recipients participating in activities organised outside the UK are disclosed in the UK report.

Where VISUfarma affiliates in other countries make payments to UK recipients, these are included where VISUfarma UK is responsible for disclosure.

R&D

N/A

Voluntary disclosure

VISUfarma does not extend disclosures beyond the requirements of the ABPI Code unless specifically required for transparency or regulatory purposes.

Specific considerations

Country unique identifier

N/A

Self-incorporated HCP

Where an HCP provides services via a self-incorporated entity (e.g. limited company), ToVs are disclosed in accordance with ABPI guidance:

- 🔥 If the contract is with the HCP personally, disclosure is made in the individual's name
- 🔥 If contracted via a legal entity, disclosure is made to the HCO

Multi-year agreements

ToVs under multi-year agreements would be disclosed in the year in which the payment is made or the service is delivered.

For 2025, there are no applicable multi-year contracts, and all payments declared relate to 2025 only.

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Country specificities

Where VISUfarma collaborates with other pharmaceutical companies (e.g. in joint activities or collaborative working), each company discloses its respective share of the ToV.

Where applicable, links to collaborative working summaries are maintained separately in accordance with ABPI requirements.

This is not applicable to VISUfarma UK for the 2025 data submission.

Quality Checks

VISUfarma applies internal quality control processes prior to submission, including:

- 🔥 Data reconciliation between finance and compliance systems
- 🔥 Validation of recipient details
- 🔥 Review of categorisation of ToVs
- 🔥 Final compliance review prior to publication

Data protection legal basis

Consent collection

VISUfarma have sought consent to declare HCPs as named individuals where possible and where applicable. This is done once for the entire yearly period in question, collecting a consent declaration form to this effect. For those who have asked to remain anonymous or have given no response, these have been declared as aggregate values. VISUfarma have kept copies of all consent information on the local SharePoint site for validation purposes.

Where consent is obtained, recipients are informed of:

- 🔥 The purpose of disclosure
- 🔥 The nature of the data published
- 🔥 Their rights, including withdrawal of consent
- 🔥 The period of the consent given (e.g. one declaration form is signed for the whole of 2025, regardless of the amount of ToVs)

Withdrawal of consent is managed in accordance with data protection laws and may result in aggregation where required.

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Legitimate interests

N/A

Form of disclosure

Date of publication

20/03/2026

Disclosure platform

Disclosure UK – www.disclosureuk.org.uk

Disclosure language

English

Disclosure financial data

Currency

All Transfer of Values (ToVs) have been provided in £GBP. Where invoices from HCPs have been claimed in Euros, such as for registration fee claims when a HCP has been travelling to an event within Europe, then an exchange rate of €1 Euro = £0.83 has been used, in line with the applicable exchange rate at the time of transaction.

VAT included or excluded

VAT is excluded in disclosure amounts where applicable.

Calculation rules

- 🔥 ToVs are disclosed on a gross basis (excluding VAT where applicable)
- 🔥 Event-related costs are allocated per individual where possible
- 🔥 Rounding is applied to the nearest whole pound and pence

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Additional Information

VISUfarma UK are committed to greater transparency about the relationships it has with healthcare professionals (HCPs), Other Relevant Decision Makers (ORDMs) and healthcare organisations (HCOs) within the pharmaceutical industry and compliance with the ABPI Code of Practice.

This methodological note is intended to provide clarity on the processes and assumptions used in preparing the 2025 disclosure and should be read alongside the disclosed data on Disclosure UK.

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