



# AGB Pharma: Methodological Note for HCP/ORDM/HCO Disclosure

Data Year: 2025

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**Company:** AGB Pharma

**Country:** Sweden

**Version:** 1.0 (Last Updated: March 2026)

**Disclosure Platform:** Disclosure UK – [www.disclosureuk.org.uk](http://www.disclosureuk.org.uk)

## Introduction

AGB-Pharma AB (AGB) is a pharmaceutical company based in Sweden that conducts interactions with healthcare professionals (HCPs), other relevant decision-makers (ORDMs) and healthcare organisations (HCOs) in the United Kingdom. As a non-UK entity that has formally agreed to abide by the ABPI Code of Practice, AGB conducts all such interactions in strict adherence to the Association of British Pharmaceutical Industry (ABPI) Code of Practice for the Pharmaceutical Industry.

This methodological note accompanies AGB Pharma's annual disclosure submission for the 2025 reporting year. It has been prepared in accordance with the mandatory standardised structure set out in EFPIA Code Annex B.

AGB has clear procedures in place for the assessment, approval and processing of all transfers of value to HCPs, ORDMs and HCOs. All such arrangements are assessed on a case-by-case basis to ensure compliance with the ABPI Code and that they are appropriate and documented accordingly.

## 1 Definitions

### 1.1 Recipients

The following categories of recipient are covered by this disclosure:

- **Health Professionals (HCPs):** Individuals who are members of the medical, dental, pharmacy, nursing or other healthcare profession, and who in the course of their professional activities may prescribe, purchase, recommend, supply, administer or advocate the use of a medicine. This includes registered practitioners in the United Kingdom.
- **Other Relevant Decision Makers (ORDMs):** Individuals who, while not HCPs, may influence the prescribing, purchasing or use of medicines, including but not limited to those holding positions in formulary management, commissioning or procurement.
- **Healthcare Organisations (HCOs):** Legal entities or bodies (other than HCPs) that are healthcare, medical or scientific associations or organisations whose membership mainly comprises HCPs and/or that are involved in the delivery of healthcare.

Transfers of value to retired HCPs or ORDMs who still hold a registration with the relevant medical body are treated in the same manner as active HCPs/ORDMs, as they remain technically registered healthcare professionals or ORDMs. Those who have retired and are no longer registered with the relevant medical body are treated in the same manner as members of the general public. In cases where an HCP or ORDM is known to be deceased prior to the publication date, AGB will consider the circumstances sensitively and determine the appropriate disclosure approach on a case-by-case basis, balancing transparency with respect for the individual and their family. Where appropriate, AGB may exclude the individual from named disclosure on Disclosure UK and report the transfer of value in aggregate. AGB maintains an internal record of such cases.

## 1.2 Kind of ToVs

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Transfers of value recorded and disclosed by AGB Pharma are categorised as follows:

### **Donations and Grants to HCOs**

Funds, services, or benefits in kind provided to healthcare organisations (HCOs) to support healthcare, research, or education, where no service or benefit is expected in return. Donations and grants to individual healthcare professionals (HCPs) or other relevant decision makers (ORDMs) are not permitted under the ABPI Code.

### **Collaborative Working (including Joint Working)**

Transfers of value associated with collaborative initiatives between AGB Pharma and healthcare organisations aimed at improving patient outcomes, enhancing healthcare delivery, or supporting healthcare system efficiencies.

### **Contribution to Costs of Events**

Financial support provided in relation to educational meetings, congresses, or training events. This includes sponsorship agreements with HCOs or third-party organisations organising events, registration fees, and travel and accommodation for HCPs or ORDMs attending such events.

### **Fees for Service and Consultancy**

Fees paid to HCPs, ORDMs, or HCOs for providing services to AGB Pharma, including consultancy, advisory board participation, speaking engagements, or other professional services conducted under a written agreement.

### **Related Expenses**

Reasonable travel, accommodation, and subsistence expenses reimbursed in connection with services provided to AGB Pharma.

### **Research and Development (R&D)**

Transfers of value relating to research and development activities, including clinical trials and non-interventional studies, which are disclosed in aggregate in accordance with the ABPI Code.

## 2 Disclosure's Scope

### 2.1 Products Concerned

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This disclosure covers transfers of value associated with Prescription Only Medicines (POMs) promoted or distributed by AGB Pharma in the United Kingdom. Over-the-counter (OTC) medicines and medical devices are not part of AGB Pharma's current portfolio and are therefore not applicable for this disclosure.

### 2.2 Company Concerned

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This disclosure covers transfers of value made directly by AGB Pharma, a company incorporated and registered in Sweden. AGB Pharma does not have a UK legal entity, subsidiary or affiliate (at the time this methodological note was developed). AGB Pharma has formally agreed to abide by the ABPI Code of Practice and accepts the jurisdiction of the PMCPA, and therefore discloses all transfers of value to UK-based HCPs, ORDMs and HCOs directly under the AGB Pharma company name.

### 2.3 Excluded ToVs

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The following categories of transfer of value are excluded from this disclosure in line with the ABPI Code:

- Costs for internal AGB-Pharma events, including room hire, technical expenses or equipment hire, where these relate solely to internal company activities and do not constitute a transfer of value to an HCP, ORDM or HCO.

- Transfers of value to members of the general public (MoPs) and patient organisations (POs), which are disclosed separately on the AGB-Pharma corporate website.
- Items/materials of medical utility and promotional aids of negligible value that fall within the limits permitted by the ABPI Code and are therefore not required to be disclosed as transfers of value.

## 2.4 ToVs Date

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This disclosure covers all qualifying transfers of value made by AGB-Pharma during the period 1 January 2025 to 31 December 2025. Where a transfer of value is a payment, the reported value corresponds to the calendar year in which the payment was made.

## 2.5 Direct ToVs

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Direct transfers of value are those made by AGB-Pharma directly to an HCP, ORDM or HCO. The following types of activity give rise to direct transfers of value:

- Fee-for-service arrangements, including speaker fees, advisory board honoraria, consultancy fees, and other professional service payments made to HCPs, ORDMs or HCOs.
- Reimbursement of travel and accommodation expenses for HCPs or ORDMs attending AGB-Pharma organised or sponsored meetings or activities.
- Registration fees for educational meetings, congresses or training events paid by AGB-Pharma to event organisers on behalf of HCPs or ORDMs.
- Donations and grants provided directly to HCOs to support healthcare, scientific research, or education.
- Contributions to the cost of events, where AGB-Pharma provides sponsorship to third-party organisations or event organisers.

## 2.6 Indirect ToVs

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Where transfers of value are made via third parties acting on behalf of AGB-Pharma (for example event organisers, agencies or service providers), AGB-Pharma ensures that the relevant transfers of value are captured and disclosed in accordance with the requirements of the ABPI Code. Where possible, transfers of value are recorded against the ultimate recipient (e.g. the healthcare professional or healthcare organisation).

## 2.7 Non-monetary ToVs

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Non-monetary transfers of value may include benefits provided in kind rather than through direct financial payment. Where AGB-Pharma provides a benefit in kind to an HCP, ORDM or HCO that falls within the disclosure requirements of the ABPI Code, the fair market value of the benefit is calculated and disclosed as a transfer of value. Where applicable, benefits in kind provided as part of donations, grants or other disclosed activities are valued based on fair market value and reported accordingly.

## 2.8 ToVs in Case of Partial Attendances or Cancellation and Refund

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Where an HCP or ORDM attends only part of an event for which AGB-Pharma has paid registration fees or travel and accommodation costs, AGB-Pharma discloses the actual transfer of value incurred.

Where an event is cancelled or an HCP/ORDM is unable to attend, any costs paid by AGB-Pharma that are not recovered from the organiser are disclosed in the reporting year in which the payment was made.

Where refunds are received within the same reporting year, these are offset against the original transfer of value. Where a refund is received in a subsequent reporting year, the adjustment is reflected in the disclosure for the year in which the refund is received.

## 2.9 Cross-border Activities

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As AGB-Pharma is incorporated in Sweden and has no UK legal entity (at the time of developing this methodological note), all transfers of value to UK-based HCPs, ORDMs and HCOs are inherently cross-border in nature. Payments are made from AGB-Pharma's Swedish company accounts and are disclosed on Disclosure UK in GBP. Where payments are made in Swedish Kronor (SEK) or Euro (€), the prevailing exchange rate at the time of the transaction, as applied by AGB-Pharma's finance function, is used to convert the value to GBP for disclosure purposes. Where AGB-Pharma supports a UK-based HCP or ORDM to attend an international event outside the UK, the transfer of value is attributed to the UK disclosure and reported in GBP. All cross-border transfers of value involving UK-based recipients are disclosed solely through Disclosure UK.

## 2.10 R&D

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AGB-Pharma did not conduct or sponsor any research and development activities during the 2025 reporting year that resulted in transfers of value to HCPs, ORDMs or HCOs as defined under the R&D provisions of the ABPI Code. This section is therefore not applicable for the 2025 reporting year.

## 2.11 Voluntary Disclosure

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AGB-Pharma's disclosures for the 2025 reporting year are limited to those required under the ABPI Code. No voluntary disclosures beyond the Code requirements have been included.

# 3 Specific Considerations

## 3.1 Country Unique Identifier

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In accordance with Disclosure UK requirements, AGB-Pharma does not submit publicly available professional identifiers (such as GMC registration numbers) to the Disclosure UK platform. AGB-Pharma does not use internal or commercial unique identifier systems for healthcare professionals (HCPs) or healthcare organisations (HCOs). Instead, records are managed using identifying information such as the individual's name, professional role, organisation and address details to ensure accurate attribution of transfers of value.

## 3.2 Self-incorporated HCP

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Where a healthcare professional (HCP) provides services through their own limited company or personal service company, AGB-Pharma assesses the nature of the engagement to determine the appropriate recipient for disclosure in accordance with the ABPI Code.

Where the services are provided by an identifiable individual HCP, the associated transfer of value is disclosed at the individual HCP level, even if payment is made to the HCP's limited company. Where the transfer of value relates to services provided by the company entity and cannot be attributed to a specific individual HCP, it is disclosed at the healthcare organisation (HCO) level.

## 3.3 Multi-year Agreements

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Where AGB-Pharma enters into multi-year contractual agreements with HCPs, ORDMs or HCOs, only transfers of value made within the 2025 calendar year are included in this disclosure. Payments scheduled under such agreements for future years will be disclosed in the relevant reporting year in which they are made. The total contract value of multi-year agreements is not disclosed in advance of payment.

## 3.4 Country Specificities

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No collaborative working arrangements with other pharmaceutical companies requiring disclosure were identified for the 2025 reporting year.

Where AGB-Pharma participates in collaborative working arrangements with other pharmaceutical companies, each participating company will disclose transfers of value relating to its own financial contribution in accordance with the ABPI Code and any agreed allocation methodology between the parties.

Where applicable, links to collaborative working executive summaries will be included within the mandatory HCP/ORDM/HCO disclosure template.

## 3.5 Quality Checks

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Prior to submission to Disclosure UK, AGB-Pharma undertakes the following internal pre-disclosure quality checks:

- Review of transfer of value records against available supporting documentation (e.g. contracts, invoices and expense records) to confirm the accuracy of reported amounts and categorisation.
- Verification of HCP and HCO recipient details, including name and organisation, using internal records and publicly available information where appropriate.
- Review of the disclosure dataset to confirm that individual and aggregate disclosures are appropriately reflected in accordance with the applicable legal basis for disclosure.

- Review of the completed disclosure dataset by the AGB-Pharma Medical/Compliance function prior to submission.
- Final upload of the disclosure dataset to Disclosure UK by an authorised AGB-Pharma representative following completion of internal checks.

## 4 Data Protection Legal Basis

### 4.1 Consent Collection

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AGB-Pharma relies on consent as the lawful basis for the individual disclosure of transfers of value to healthcare professionals (HCPs) and other relevant decision makers (ORDMs).

Consent is obtained through AGB-Pharma's contractual documentation prior to engagement. As part of this process, recipients are informed that AGB-Pharma is required under the ABPI Code of Practice to document and publicly disclose certain transfers of value. They are notified that information relating to payments or other transfers of value made under the agreement, including their name and the value of the transfer, may be publicly disclosed on platforms such as Disclosure UK.

Where consent has been obtained, transfers of value are disclosed individually, with the HCP or ORDM named on Disclosure UK. Where consent has not been obtained, or where consent is withdrawn prior to the publication date, the transfer of value is disclosed in aggregate and the individual is not named.

Partial disclosures: Where an HCP or ORDM consents to the disclosure of some transfers of value but not others, AGB-Pharma manages these cases in accordance with the supplementary information to Clause 28.5 of the ABPI Code, ensuring that only the transfers of value covered by consent are disclosed individually, with the remainder included within the aggregate disclosure.

Withdrawal of consent: HCPs and ORDMs may withdraw consent at any time prior to the annual publication date. Where consent is withdrawn before publication, the relevant transfer of value will be moved from individual disclosure to the aggregate disclosure. Consent withdrawn after publication cannot be applied retrospectively but will be applied to future disclosures.

### 4.2 Legitimate Interests

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AGB-Pharma does not rely on Legitimate Interests as the lawful basis for individual disclosure of transfers of value. Where consent for individual disclosure is not obtained, the relevant transfers of value are disclosed in aggregate in accordance with the ABPI Code.

## 5 Form of Disclosure

### 5.1 Date of Publication

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The 2025 disclosure data will be published 30 June 2026.

### 5.2 Disclosure Platform

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Disclosure UK – [www.disclosureuk.org.uk](http://www.disclosureuk.org.uk)

### 5.3 Disclosure Language

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English

## 6 Disclosure Financial Data

### 6.1 Currency

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All transfers of value disclosed by AGB-Pharma are reported in GBP (£). Where payments have been made in currencies other than GBP, the amounts have been converted to GBP using the applicable exchange rate at the time the payment was processed within AGB-Pharma's financial systems.

## 6.2 VAT Included or Excluded

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As AGB-Pharma AB is a Swedish entity, it does not pay VAT and VAT is therefore not applicable to its transfers of value. All costs disclosed are exclusive of VAT.

## 6.3 Calculation Rules

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The following calculation rules have been applied in preparing the 2025 disclosure:

- Fees for service and consultancy: Disclosed at the actual contracted fee paid by AGB-Pharma AB during the reporting year. Where applicable, amounts are reported exclusive of VAT and converted to GBP.
- Travel and accommodation: Disclosed at the actual cost incurred by AGB-Pharma AB, whether paid directly by AGB-Pharma or reimbursed to the individual. Where such costs are paid directly on behalf of an HCP or ORDM, they are attributed to the individual recipient.
- Registration fees: Disclosed at the actual fee paid by AGB-Pharma AB to the conference or event organiser and attributed to the relevant HCP or ORDM.
- Donations and grants to HCOs: Disclosed at the value of funds transferred or, where applicable, the fair market value of any benefits provided in kind.
- Contributions to the cost of events: Disclosed at the sponsorship amount paid by AGB-Pharma to the event organiser.
- In-kind transfers of value: Valued based on the fair market value of the goods or services provided.

# 7 Additional Information

This methodological note has been prepared in accordance with the mandatory standardised structure set out in EFPIA Code Annex B, as required by the PMCPA for all HCP/ORDM/HCO disclosures of 2025 transfers of value published in 2026.

Transfers of value to patient organisations (POs) and members of the general public (MoPs) are disclosed separately on the AGB-Pharma corporate website.

AGB-Pharma is committed to maintaining the integrity of Disclosure UK and to ensuring that all disclosures are accurate, complete and compliant with the ABPI Code.