

Menarini Stemline: 2026 Methodological Note (Reporting 2025 Data)

At Menarini Stemline, we believe that transparency is essential to building and maintaining confidence in us and in our medicines. We strongly support the work being done by The European Federation of Pharmaceutical Industries and Associations (EFPIA) to improve transparency across the pharmaceutical industry.

This methodological note presents how the transfers of value to Health Care Professionals (HCPs), Other Relevant Decision makers (ORDMs) and Health Care Organisations (HCOs) are categorised and in what format they are disclosed.

1. Definitions

1.1. Recipients

Menarini Stemline applies the following definitions for recipients, strictly adhering to the ABPI 2024 Code of Practice:

- **Healthcare Professionals (HCPs):** Any member of the medical, dental, pharmacy, or nursing profession and any other person who, during their professional activities, may administer, prescribe, purchase, recommend, or supply a medicine. This includes any employee of a pharmaceutical company whose primary occupation is that of a practising HCP (Clause 1.9).
- **Other Relevant Decision Makers (ORDMs):** Individuals with an NHS role who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply, or use of any medicine but who are not health professionals (Clause 1.13).
- **Healthcare Organisations (HCOs):** Any healthcare, medical, or scientific association or organisation (e.g., hospital, clinic, foundation, university, or learned society) whose business address or primary place of operation is in Europe, or an organisation through which one or more HCPs or ORDMs provide services (Clause 1.8).
 - **The Single-HCP HCO Rule:** In accordance with Clause 1.8, if an HCO consists of only one HCP or ORDM, that entity is subject to the disclosure requirements applicable to individual health professionals.

Management of Retired or Deceased Recipients In compliance with PMCPA guidance, Transfers of Value (ToVs) to retired or deceased HCPs/ORDMs are managed based on the recipient's status and consent at the exact time the ToV was made. Data remains reportable for the period the recipient was active, regardless of subsequent death or retirement.

1.2. Kinds of Transfers of Value (ToVs)

Menarini Stemline categorises ToVs as follows:

- **Donations and grants:**

Collectively, mean providing funds, benefits in-kind, or services freely given for the purpose of supporting healthcare, scientific research or education, with no consequent obligation on the recipient organisation, institution and the like to provide goods or services to the benefit of the

pharmaceutical company in return. Donations and grants to individuals are prohibited. In general donations are physical items, services or benefits in-kind which may be offered or requested. Grants are the provision of funds.

- **Sponsorship agreements with HCOs/third parties appointed by HCPs to manage an Event:**

Support for a specific event, activity or item which is organised and or produced by, or for, a third party. This may include financial support, goods or services. Examples of activities sponsored by in this way include support for a speaker, rental of stand space.

- **Registration fees:**

Registration fees paid for HCPs/HCOs to attend events. These may be provided directly to HCPs in response to unsolicited requests or to HCOs for them to determine attendees.

- **Travel and Accommodation for Events:**

This subcategory relates to support in the form of payment of travel and accommodation when Menarini Stemline supports the attendance of HCPs at medical/scientific events organised by third parties. Examples include airfares, train tickets, mileage, taxis, tolls, parking fees and hotel accommodation.

- **Fees for contracted services:**

Fees paid to HCPs, ORDMs or members of the public (in aggregate) for services rendered where there is legitimate business need. Examples include chairing and speaking at meetings, participation in advisory boards and training services.

- **Research and Development:**

ToVs related to the planning or conduct of non-clinical studies (OECD GLP), clinical trials (Regulation 536/2014), and prospective non-interventional studies.

2. Disclosure's Scope

2.1. Products Concerned

This disclosure applies exclusively to ToVs associated with **Prescription Only Medicines (POMs)** named Orserdu (elacestrant) and Nexpiovio (Selinexor).

2.2. Company Concerned

This report covers Menarini Stemline and all global affiliates. All ToVs made by any Menarini Stemline entity to UK-based recipients are captured and reported within this UK disclosure.

2.3. Excluded ToVs

Not applicable.

2.4. ToVs Date

The reporting period is the full 2025 calendar year (01/01/2025 to 31/12/2025).

2.5. Direct ToVs

Menarini Stemline discloses all transfers of value made directly to a recipient's bank account or provided as a benefit-in-kind. Direct ToVs include Fee for Service payments made directly to the recipient.

2.6. Indirect ToVs

Menarini Stemline UK may utilize third-party agencies (such as travel management companies or professional congress organizers) to support the logistics of HCP/ORDM engagements.

- **Agency Support:** We may use an agency to support us with booking **hotels, flights/transportation, and registration fees.**
- **Disclosure Basis:** While the payment is made to the agency, these are disclosed as **Indirect Transfers of Value** because the ultimate benefit is attributed to the individual HCP/ORDM or recipient HCO.
- **Scope of Reporting:** The value disclosed reflects the actual cost of the travel, accommodation, or registration fee provided to the recipient, excluding any administrative or service fees charged by the agency for their support

2.7. Non-monetary ToVs

These include benefits such as staff time or physical materials provided for supporting healthcare, however there are none to report.

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

- **Cancellations:** Fees paid for cancelled services where no benefit was received are not reported.
- **No-Shows:** "In Kind" benefits (e.g., pre-paid hotel rooms) are not reported if the company confirms the recipient did not attend and thus received no benefit.

2.9. Cross-border Activities

All ToVs provided to UK residents by non-UK Menarini Stemline affiliates are identified and consolidated into the UK report.

2.10. Research and Development (R&D)

R&D ToVs are disclosed in aggregate and include all activities defined in Section 1.2 above, however there were none to report.

2.11. Voluntary Disclosure

Not applicable.

3. Specific Considerations

3.1. Country Unique Identifier

Menarini Stemline does not use any specific identifier, the "Unique country local identifier" column is marked as "N/A".

3.2. Self-incorporated HCP

HCPs operating as limited companies are disclosed as HCOs. However, if the entity is a single-HCP corporation, it remains subject to individual disclosure requirements.

3.3. Multi-year Agreements

For contracts spanning multiple years, only the ToVs with a reportable date (clearing date for cash, end date for in-kind) within 2025 are disclosed.

3.4. Country Specificities

- **Collaborative Working and Joint Ventures/Co-promotion:** Not applicable

3.5. Quality Checks

Prior to submission to Disclosure UK, Menarini Stemline conducts rigorous validation, including automated checks for valid UK postcodes and professional email formats to ensure data integrity.

4. Data Protection Legal Basis

4.1. Consent Collection

Named disclosure is sought for all HCPs/ORDMs. If consent is refused or withdrawn before publication, the ToV is moved to the aggregate section. The number of individuals disclosing partially (individual vs. aggregate) is clearly identified (Note H).

4.2. Legitimate Interests

Where Legitimate Interests is applied, Menarini Stemline conducts a formal balancing test. Recipients are informed of their right to object. If an objection is upheld, data is aggregated.

5. Form of Disclosure

- **5.1. Date of Publication:** 19/03/2026
 - **5.2. Disclosure Platform:** Disclosure UK – www.disclosureuk.org.uk
 - **5.3. Disclosure Language:** English
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6. Disclosure Financial Data

6.1. Currency

All values are reported in **GBP**. For payments made in foreign currencies, the exchange rate on the day of the payment/transaction is applied using Menarini Stemline standard exchange rates.

6.2. VAT Included or Excluded

- **In-Kind ToVs:** Reported **including** VAT.
- **Direct Payments:** Reported **excluding** VAT.
- **Non-VAT Jurisdictions:** Where VAT cannot be recovered or does not apply, the gross cost to the company is reported.

6.3. Calculation Rules

- **Multi-HCP Events:** Where a benefit (e.g., a group transfer) is provided to multiple recipients, the total cost is divided by the total number of actual attendees to determine the individual reportable value.
 - **Travel/Accommodation:** Reported at the actual cost incurred by the company (Note M).
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7. Additional Information

For any questions regarding this methodological note or the 2025 Disclosure Report, please contact:

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