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**Country:** United Kingdom

# **Sun Pharma UK: Methodological Note for HCP/ORDM/HCO Disclosure 2025**

**Data year:** 2025

**Year of publication:** 2026

## **Introduction**

SUN Pharma UK Ltd, is a wholly owned subsidiary of SUN Pharma (Netherlands) B.V, whose ultimate parent company is SUN Pharmaceutical Industries Ltd, incorporated in India. This disclosure submission relates solely to the UK operation of SUN Pharma UK Ltd. In collecting and preparing the information to be used in the submission of transfers of value to Health Care Professional's (HCP's), Other Relevant Decision makers (ORDM's) and Health Care Organisations (HCO's), SUN Pharma UK Ltd (SUN Pharma) setup the following processes.

## **1. Definitions**

### **1.1 Recipients**

- HCPs: individuals practising medicine, pharmacy, dentistry, nursing or other healthcare professions.
- HCOs: hospitals, universities, medical societies, charities, or organisations providing healthcare or supporting healthcare delivery.

### **1.2 Kind of ToVs**

- Fees for services (e.g., speaking, chairing, consultancy).
- Support of attendance at meetings or congresses (registration, travel, accommodation).

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

### **2.1 Products concerned**

Disclosure relates to all Sun Pharma UK prescription medicines, marketed or investigational, for which activities with HCPs/HCOs occurred in 2025. This includes scientific exchange, medical education and advisory services.

### **2.2 Company concerned**

This note reflects activities conducted by Sun Pharmaceutical Industries Europe B.V. – UK affiliate (“Sun Pharma UK”), including ToVs made directly by the UK affiliate, other Sun Pharma affiliates, or indirectly through third parties acting on its behalf.

### **2.3 Excluded ToVs**

- Transfers not related to prescription medicines.
- Internal company expenses not benefiting an HCP/HCO.
- Subsistence hospitality in line with ABPI code.
- Items of utility under the permitted threshold (not considered ToVs).

### **2.4 ToVs date**

ToVs are recorded based on the date the value was transferred, not the date of the contract or invoice creation. When payments span multiple dates, each payment is recorded according to the actual transfer date.

### **2.5 Direct ToVs**

Payments made directly to a named HCP or HCO (e.g., direct bank transfer for a consultancy).

### **2.6 Indirect ToVs**

Payments made to third parties (e.g., congress organisers, medical agencies) for the benefit of an HCP or HCO, including sponsorships where beneficiaries are selected by a third party but funded by Sun Pharma UK.

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

Non-monetary ToVs include benefits with a quantifiable equivalent value (e.g., congress registration provided in-kind). Meal subsistence within ABPI limits is excluded.

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

If an HCP partially attends or cancels after commitments were made, costs retained by third-party providers are disclosed. Refunded amounts are not disclosed. If reallocated to another HCP, the value is disclosed under the final beneficiary's name.

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

Cross-border ToVs are disclosed by Sun Pharma UK if the beneficiary is based in the UK, even when the activity is organised or paid for by another Sun Pharma affiliate directly or via agency.

## **2.10 R&D**

There were no R&D related ToVs for the 2025 declaration.

## **2.11 Voluntary disclosure**

Where consent is not obtained or not required, data is disclosed on an anonymous aggregate basis in line with ABPI Code obligations. There were no aggregate cases for the 2025 ToVs.

# **3. Specific Considerations**

## **3.1 Country unique identifier**

For UK recipients, identifiers include full name, primary place of practice, and role. No national ID numbers are used.

## **3.2 Self-incorporated HCP**

There were no self-incorporated (HCP invoicing via limited companies) payments for this calendar year.

## **3.3 Multi-year agreements**

For contracts covering multiple years, only ToVs transferred in 2025 are disclosed in this data year. There were no multi-year agreements taking place in 2025.

## **3.4 Country specificities**

- Alignment with the current ABPI Code of Practice.
- PMCPA guidance.
- UK GDPR and Data Protection Act 2018 compliance.

## **3.5 Quality Checks**

Internal verification against agreed contracts and deliverables, with senior oversight, is in place.

# **4. Data Protection Legal Basis**

## **4.1 Consent collection**

Where required, consent is collected via signed agreements. If consent is not granted, ToVs are disclosed in aggregate without naming the HCP. There were no aggregate cases for the 2025 ToVs.

## **4.2 Legitimate interests**

Some ToVs may be disclosed under legitimate interests where appropriate under the ABPI Code and PMCPA guidance. Data is processed in accordance with GDPR principles.

## **5. Form of Disclosure**

### **5.1 Date of publication**

The 2025 ToVs dataset will be published in June 2026, following ABPI timelines.

### **5.2 Disclosure platform**

Disclosure will be published on the ABPI Disclosure UK platform.

### **5.3 Disclosure language**

The disclosure and methodological note are provided in English.

## **6. Disclosure Financial Data**

### **6.1 Currency**

All ToVs are reported in GBP (£). For ToVs that were originally paid in a different currency, a conversion to local currency GBP is made. Where transfers of value were made in currencies other than GBP, amounts were converted using the European Central Bank (ECB) quarterly average exchange rate.

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

Direct payments are disclosed exclusive of VAT, if applicable. All ToVs for HCP/ORDM related to travel and accommodation (e.g., flight ticket, hotel room, etc.) are reported inclusive of VAT, where applicable.

### **6.3 Calculation rules**

For multi-component activities (e.g., travel + accommodation + registration), each component is valued individually and recorded against the beneficiary. Third-party management fees are excluded unless directly benefiting the HCP/HCO.

## **7. Additional Information**

Further clarifications can be provided upon request.