

**Pharma Nord (UK) Ltd**  
**ABPI Disclosure Territory: United Kingdom**  
**Disclosure Period: Calendar year 2024**

# Methodology Note

Applicable to  
Disclosure of Transfers of Value Report  
(1st January 2024 – 31st December 2024)

This report, published in 2025 on the ABPI portal, will cover all relevant Transfers of Value (ToVs) made in 2024.

## Introduction

In order to ensure confidence in the pharmaceutical industry, transparency surrounding the industry's relationship with healthcare providers (HCPs), other relevant decision makers (ORDMs), healthcare organisations (HCOs), patient organisations (POs) and other members of the public (MoPs) - including patients and journalists is fundamental.

This methodological note is intended to guide readers in understanding how the Transfers of Value (ToVs) from Pharma Nord to Healthcare Professionals (HCPs), Healthcare Organisations (HCOs), and Other Relevant Decision Makers, patient organisations (POs) and other members of the public (MoPs) (collectively referred to as Reportable Recipients) within the United Kingdom have been collated and reported in accordance with the most updated ABPI Code of Practice.

In the UK, the ABPI Code of Practice incorporates the requirements of the EFPIA (European Federation of Pharmaceutical Industries and Associations) Disclosure Code. In addition, the ABPI Code of Practice requires that the reporting of payments made to healthcare organisations consisting of only one healthcare professional or other relevant decision maker will be subject to the requirements of the ABPI Code for individual healthcare professionals. The ABPI Code also requires that all transfers of value made by companies in connection with collaborative working, including joint working, between the NHS and pharmaceutical industry must be publicly disclosed.

## Commitment

Pharma Nord (UK) Ltd is committed to transparency in our business operations and relationships with HCPs, ORDMs, HCOs, patient organisations, and members of the public (including patients and journalists). Sharing information about these relationships enhances public confidence and understanding, demonstrating that these interactions are intended to improve patient care, build trust, and uphold the integrity of healthcare practices.

Additionally, we commit to ensuring that all Transfers of Value (ToVs) made to UK-based HCPs and HCOs by other Pharma Nord affiliates will always be included in Pharma Nord (UK) Ltd's annual disclosure, maintaining transparency and compliance.

Pharma Nord (UK) Ltd has established clear procedures for assessing, approving, and processing transfers of value to Reportable Recipients, ensuring compliance with the ABPI Code of Practice through a case-by-case evaluation of financial support requests.

All payments or in-kind contributions made by Pharma Nord to HCPs, ORDMs, HCOs, POs, or MoPs will be documented and categorised as follows:

- **Fees:** Honoraria, consultancy fees, speaker fees, fees for market research, or advisory activities conducted by HCPs, HCOs, ORDMs, POs, or MoPs on behalf of Pharma Nord.
- **Registration Fees:** Registration fees paid by Pharma Nord to or on behalf of an HCP or ORDM associated with their attendance at national or international educational meetings, congresses, or courses.
- **Travel & Accommodation:** Costs associated with travel, subsistence, and accommodation agreed as part of sponsorship paid by Pharma Nord to or on behalf of an HCP or ORDM associated with their attendance at national and international educational meetings, congresses, or courses.
- **Related Expenses:** Travel costs and subsistence incurred while engaged on behalf of Pharma Nord or as part of their sponsorship.
- **Donations & Grants:** Donations (physical items, services, or benefits-in-kind) and grants (the provision of funds) may be offered or requested. The purpose of donations and/or grants are to support healthcare, scientific research or education with no obligation on the recipient organisation or institution to provide any benefit to Pharma Nord in return. Donations and grants to individuals are prohibited.
- **Contribution to the Cost of an Event:** Sponsorship or support for events organised by independent organisations.

## Key Terms and their Definitions

To avoid any doubt, the following terms are fully defined in the ABPI Code of Practice 2024:

- TRANSFER OF VALUE (Clause 1.25)
- RESEARCH AND DEVELOPMENT TRANSFER OF VALUE (Clause 1.20)
- HEALTHCARE PROFESSIONAL (Clause 1.9)
- HEALTHCARE ORGANISATION (Clause 1.8)
- OTHER RELEVANT DECISION MAKER (Clause 1.13)
- PATIENT ORGANISATION (Clause 1.15)
- INDIVIDUAL REPRESENTING A PATIENT ORGANISATION (Clause 1.16)
- EVENTS (Clause 1.7)
- CONTRIBUTION TO COSTS RELATED TO EVENTS (Clause 1.4)
- HOSPITALITY (Clause 1.10)
- SPONSORSHIP (Clause 1.22)
- SUPPORT (Clause 1.22)
- COLLABORATIVE WORKING (Clause 1.3)
- DONATION AND GRANTS (Clause 1.5)

## Scope

This Methodology Note applies to the Disclosure Report for the Pharma Nord (UK) Ltd transfers of value to UK HCPs, ORDMs, HCOs, POs and MoPs as required by the ABPI Code of Practice for the reporting period 1st January 2024 to 31st December 2024.

## Transfer of Value Categories

| Category                       | Subcategory                                                     | Example Activities                                                                                                                                                           |
|--------------------------------|-----------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Contribution to Cost of Events | Sponsorship Agreements (Independent Pharma events organisation) | <ul style="list-style-type: none"> <li>• Funding an event in return for a display booth</li> </ul>                                                                           |
| Fees                           | Consultancy (HCPs Only)                                         | <ul style="list-style-type: none"> <li>• Review of regulatory, scientific and clinical material and provision of advice to the Pharma Nord (UK) Ltd medical team.</li> </ul> |
| Fees                           | meetings attendance (HCPs Only)                                 | <ul style="list-style-type: none"> <li>• Attending regulatory meetings with or on behalf of Pharma Nord (UK) Ltd medical team</li> </ul>                                     |

## **Other Considerations to the ToVs Disclosure for the 2024**

### **Transfers of Value related Pharmaceutical Products**

In accordance with the EFPIA Disclosure Code, all Transfers of Value (ToVs) reported for the 2024 period relate exclusively to licensed prescription-only medicines and fully comply with ABPI disclosure requirements.

Pharma Nord (UK) Ltd does not market licensed OTC medicinal products in the UK. As these are outside the scope of the EFPIA Disclosure Code, no disclosures related to OTC products are included in the 2024 report.

Where Pharma Nord (UK) Ltd transfers of value are connected to both our over-the-counter supplements and prescription medicines, this will be disclosed in full.

### **Data Protection and Legal Basis for Disclosure**

Pharma Nord UK Ltd ensures that all disclosures of transfers of value (ToVs) to healthcare professionals (HCPs) comply with data protection regulations and the requirements of the ABPI Code of Practice.

In 2024, Pharma Nord relied on explicit written consent from healthcare professionals (HCPs) to process and disclose personal data related to transfers of value (ToVs). HCPs had full control over their data, with the option to opt in or out at any time, determining whether their ToVs information was publicly disclosed against them as an individual. To comply with the ABPI Code of Practice, Pharma Nord obtained and managed consent records for each disclosure, ensuring only approved data was processed. This approach included maintaining a consent database, incorporating clear consent clauses in contracts, and publishing ToVs disclosures only for HCPs who provided explicit permission while removing data upon withdrawal of consent. Where consent was not supplied, or was withdrawn, the relevant ToVs are disclosed as part of the aggregate values.

### **Timing of Transfers of Value (ToVs)**

A ToV is recorded at the time of completion, meaning when the payment is made, or the benefit is received. For instance, if a contract is signed on October 1, 2023, but the payment is processed on January 15, 2024, the ToV will be reported as part of the 2024 disclosure, submitted to the ABPI, and published in 2025.

### **Transactions and currency conversions**

All ToVs for the 2024 reporting period have been paid and disclosed in local currency British Pounds (GBP £).

### **VAT considerations**

All disclosed transfer of value amounts will be reported as net amounts, excluding VAT.

## **Cross-border payments**

Pharma Nord discloses transfers of value (ToVs) based on the healthcare professional's (HCP's) primary country of practice. If an HCP practices in multiple countries, ToVs are reported under their primary location. For the 2024 reporting period, Pharma Nord (UK) Ltd confirms that all engaged HCPs were based in the UK, and that all ToVs to HCPs based in the UK made by other Pharma Nord affiliates have been documented and included as part of Pharma Nord (UK) Ltd's disclosure.

## **Multi-Year Contracts**

All disclosed transfers of value (ToVs) relate solely to transactions completed within the reporting year, with no payments or financial commitments extending beyond a single calendar year. For instance, if a consultancy agreement runs from July 1, 2022, to December 31, 2024, with payments made in stages, only the amounts paid in 2024 would be included in that year's disclosure. For the 2024 reporting period, Pharma Nord UK Ltd did not enter into any multi-year contracts with healthcare professionals (HCPs), other relevant decision makers (ORDMs), or healthcare organisations (HCOs).

## **No Partial Disclosures**

There were no partial disclosures in the 2024 reporting period.

## **Disclosures for Retired or Deceased HCPs**

Should an HCP retire or pass away after receiving a transfer of value but before the disclosure period, their data would still be reported in line with ABPI Code requirements. Pharma Nord UK Ltd confirms that in the absence of such cases for the reporting year 2024, no disclosures for retired or deceased HCPs have been made.

## **No Collaborative Working (including Joint Working) or Joint Venture/Co-promotion Disclosures**

There were no collaborative working arrangements or joint ventures /co-promotions with other pharmaceutical companies during the 2024 reporting period.

## **No Company Changes or Mergers**

Pharma Nord UK Ltd confirms that there have been no company name changes, mergers, or structural changes that impact the disclosures for the 2024 reporting period. The company has operated under the same legal entity throughout the year, ensuring consistency in reporting.

## **Private companies**

Where an HCP/ ORDM runs a private company (where he/she is the only employee of the corporation), Pharma Nord has treated this as if it were an individual HCP/ ORDM and has disclosed against the individual (subject to received consent – refer to Data Protection and Legal Basis for Disclosure).

Where an organisation is principally made up of a group of HCPs, but where the ToVs cannot be reasonably ascribed to an individual HCP within the organisation, this organisation has been designated an HCO and the ToVs disclosed accordingly.

## **Duration of Publication**

Pharma Nord's disclosure report will be available for a period of three years. We will amend the report accordingly, if required for specific, e.g. legal reasons.

## **Patient Organisations and Member of the Public**

Pharma Nord (UK) Ltd did not make any Transfer of Value (ToVs) to patient organisations or members of the public in 2024.

## **Research and Development (R&D) (clinical trials, non-clinical studies, non-interventional studies)**

Pharma Nord (UK) Ltd and other Pharma Nord Affiliates did not engage in research and development (R&D) related to prescription only medicines, nor did they provide financial or in-kind support to any research institutions in the UK in 2024.

## **Donations & Grants**

Pharma Nord (UK) have not made any donations or grants in 2024.

## **Verification and Accuracy and Quality Control**

All disclosed information is checked, validated, and reviewed internally before being submitted to Disclosure UK. Regular internal audits will be conducted to validate the data accuracy and completeness.