

Esteve Ltd.: Methodological note for HCP/ORDM/HCO disclosure 2026

Data year: 2025

Year of publication: 2026

Transparency is fundamental to ensure a positive working relationship between the pharmaceutical industry and healthcare providers, relationships that best serve the interests of patients. Esteve Ltd. (Esteve or the 'Company') has prepared this document to outline the Company's interpretations and assumptions made and methodologies used in complying with the requirements to disclose payments to Healthcare Professionals (HCPs), other relevant decision makers (ORDMs) and Healthcare Organisations (HCOs) under the Code of Practice 2024 administered by the Prescription Medicines Code of Practice Authority (PMCPA).

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1 Definitions

1.1 Recipients

Esteve will consider the recipient to be the contracting entity, which may be a HCP, [a legal entity owned by a HCP (which is then a HCO)] or a HCO. Hence the contracting party as stated on the legal contract executed between Esteve and the counterpart will be reported as the recipient.

1.2 Kind of ToVs

The ToVs data is based on any direct or indirect ToV, whether monetary, benefit in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and/or sale of prescription only medicinal products for human use.

2 Disclosure's Scope

2.1 Products concerned

Prescription only medicines

2.2 Company concerned

Esteve Ltd.

2.3 Excluded ToVs

Not applicable

2.4 ToVs date

January 2025 to December 2025

2.5 Direct ToVs

A ToV can be salary, fee or remuneration for a service provided by the HCP, ORDM or HCO to Esteve. Expenses incurred during the execution of the service (e.g. travel and accommodation) and donations and sponsorships provided by Esteve are also considered to be ToV.

This includes, but is not limited to, payments of fees for services, consultancy and associated expenses, registration fees, sponsorships, grants, donations, travel, accommodation.

Examples of ToV covered under Fee for Service and Consultancy agreements:

- Speaker fees
- Webinar Faculty
- Development of case studies
- General consulting/advising
- Chairing and speaking at meetings

2.6 Indirect ToVs

Indirect ToVs would be via a third-party event organiser.

2.7 Non-monetary ToVs

Not applicable

2.8 ToVs in case of partial attendances or cancellation and refund

Not applicable

2.9 Cross-border activities

ToVs related to cross-border activities were captured by checking UK cross border request forms and legal contracts related to the event and detailing any ToVs made to UK recipients

2.10 R&D

Not applicable

2.11 Voluntary disclosure

Not applicable

3 Specific considerations

3.1 Country unique identifier

[Not applicable]

3.2 Self-incorporated HCP

Not applicable

3.3 Multi-year agreements

Not applicable

3.4 Country specificities

Not applicable

3.5 Quality Checks

Data for the relevant year has been amalgamated from the relevant supporting documentation including HCP contracts, meeting approval forms and invoices, and checked for accuracy and completeness before adding to the relevant sections of the disclosure template.

4 Data protection legal basis

4.1 Consent collection

Esteve has endeavoured to seek consent from all HCPs to disclose on an individual basis, naming the recipient and identifying the Transfer of Value (ToV). To this end, the Company has incorporated a clause to this effect in the contractual templates on the basis of which all such engagements should proceed. For each activity, consent is requested at the inception of a HCP agreeing to provide services for the Company. This consent is stored electronically allowing a review of records if required in future.

Should a HCP provide consent for one meeting but decline consent for another, all interactions will be included in the aggregate value. No partial disclosures will be made.

In circumstances where a HCP declines to give, or subsequently withdraws consent to disclose on an individual basis of ToV during the reporting calendar year all ToV with no consent to disclose are included in the aggregate value.

4.2 Legitimate interests

Not applicable

5 Form of disclosure

5.1 Date of publication

30/06/26

5.2 Disclosure platform

Disclosure UK – www.disclosureuk.org.uk

5.3 Disclosure language

English

6 Disclosure financial data

6.1 Currency

GDP

6.2 VAT included or excluded

The Company has made its disclosures relating to direct ToVs exclusive of all applicable taxes including VAT.

6.3 Calculation rules

Not applicable

7 Additional Information

[The Company has made its disclosures relating to when the engagement with the HCP, ORDM or HCO occurred rather than when the cash payments were made. That is, if the engagement occurred in 2025 the ToV will be registered on the 2025 listing even if it was not paid until 2026.