



Alfasigma UK Limited: Methodological note for HCP/ORDM/HCO disclosure 2025

Data year: 2025

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ALFASIGMA UK LIMITED
Omega Uxbridge
Belmont
Belmont Road
Uxbridge, UB8 1HE
United Kingdom

Registered address:
Salisbury House
Station Road
Cambridgeshire
Cambridge, CB1 2LA
United Kingdom

VAT GB 203 017 668
A company registered in England and Wales with registration number 03400161

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1 Definitions

1.1 Recipients

This methodological note explains how Alfasigma UK Limited and other companies within the Alfasigma group apply the ABPI Code of Practice (the "Code") when disclosing transfers of value ("ToVs") made to UK healthcare professionals ("HCPs") and healthcare organisations ("HCOs").

HCPs are defined by the Code as any member of the medical, dental, pharmacy or nursing profession, as well as any other person who, in the course of their professional activities, may administer, prescribe, purchase, recommend, or supply a medicine.

HCOs are defined as healthcare, medical, or scientific associations or organisations, such as hospitals, clinics, foundations, universities, teaching institutions, or learned societies whose business address, place of incorporation, or primary place of operation is in Europe. This definition also includes organisations through which one or more HCPs or relevant decision makers provide services. If an HCO consists of only one HCP or relevant decision maker, it is subject to the Code provisions applicable to individual HCPs.

Where Alfasigma is aware that ToVs were made to HCPs who had passed away at the time of disclosure, these ToVs have been included in the aggregate category and not reported at an individual level.

1.2 Kind of ToVs

The types of ToVs included in Alfasigma's submission include TOVs as defined in the Code. This includes any direct or indirect transfer of value, whether in cash, in-kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development or sale of medicines. A direct transfer of value is one made directly by a company for the benefit of a recipient. An indirect transfer of value is one made on behalf of a company for the benefit of a recipient or through an intermediate and where the company knows or can identify the recipient that will benefit from the transfer of value. The ToVs covered by this note are:

- donations and grants
- collaborative working (UK variation)
- contribution to costs of events
- contracted service fees and expenses
- R&D costs

2 Disclosure's Scope

2.1 Products concerned

The products relating to Alfasigma's submission of ToVs cover prescription-only products where Alfasigma or its parent company is the marketing authorisation holder (Jyseleca®).

2.2 Company concerned

This note relates to Alfasigma UK Limited and any payments made to UK HCPs or UK HCOs by other companies in the Alfasigma group of companies.

2.3 Excluded ToVs

The following transfers of value are excluded from the definition of transfers of value and are not applicable to this statement:

- transfers of value that are solely related to OTC medicines
- ordinary course purchases and sales of medicines by and between a company and a health professional or a healthcare organisation
- samples of medicines provided in accordance with Clause 21 of the Code of Practice
- transfers of value provided in accordance with Clauses 10.5, 10.6 and 19.2 of the Code
- subsistence provided to health professionals and other relevant decision makers in accordance with Clause 10.1 of the Code

2.4 ToVs date

This note relates to ToVs made during the calendar year of 2025.

2.5 Direct ToVs

A direct transfer of value is one made directly by Alfasigma to a recipient. For example, payment of consultancy fees directly to the HCP.

2.6 Indirect ToVs

An indirect transfer of value is one made on behalf of Alfasigma for the benefit of a recipient or through an intermediate and where the company knows or can identify the recipient that will benefit from the transfer of value. For example, payment of sponsorship fees to a third party who is supplying services to an HCO relating to an event that the HCO is responsible for.

2.7 Non-monetary ToVs

N/a

2.8 ToVs in case of partial attendances or cancellation and refund

N/A

2.9 Cross-border activities

Payments relating to cross-border activities relate to ToVs paid to UK based HCPs and HCOs by an affiliate of Alfasigma UK Limited. These have been disclosed where consent has been obtained in respect of HCPs and disclosed in full in respect of HCOs.

2.10 R&D

R&D costs are disclosed in an aggregate level in a single amount that covers all payments made to UK HCPs and HCOs relating to transfers of value to health professionals or

healthcare organisations related to the planning or conduct of: i. non-clinical studies (as defined in the OECD Principles of Good Laboratory Practice) ii. clinical trials (as defined in Regulation 536/2014) iii. non-interventional studies that are prospective in nature and that involve the collection of patient data from or on behalf of individual or groups of health professionals specifically for the study.

2.11 Voluntary disclosure

Voluntary disclosures beyond the requirements of the Code are not covered by this statement and have not been disclosed.

3 Specific considerations

3.1 Country unique identifier

Alfasigma uses unique identifiers within its internal systems in order to distinguish HCPs at an individual level and to ensure that payments are recorded against the correct HCP and to avoid duplication of records of payments.

3.2 Self-incorporated HCP

Payments to HCPs via limited companies have been treated as payments to an HCP directly and are disclosed against the individual HCP, or otherwise the HCO.

3.3 Multi-year agreements

ToVs submitted relate to payments made during 2025. Payments made in respect of multiyear agreements are only disclosed if payments were made during 2025.

3.4 Country specificities

N/A

3.5 Quality Checks

ToVs are recorded in Alfasigma's payment and approval system, Payce, managed by an external provider. A report detailing all 2025 ToVs was generated, including methodological guidance from the provider. The Legal department reviewed these reports, and random sampling was conducted to verify accuracy prior to populating the ABPI template and submitting to the Disclosure UK portal.

4 Data protection legal basis

4.1 Consent collection

Alfasigma has relied on Consent as the legal basis for disclosure of ToVs to HCPs. Consent relating to ToVs is captured in the Payce system used by Alfasigma for contracting with HCPs and HCOs. In the system HCPs are asked when signing the contract with Alfasigma to select whether they consent to the ToVs being disclosed publicly. HCPs are then able to manage their consent preference in the system at a later date, if they wish to withdraw the consent. Consent relates to all payments made to them in the calendar year, so HCPs could not consent to only some payments.

4.2 Legitimate interests

N/A

5 Form of disclosure

5.1 Date of publication

31 March 2026

5.2 Disclosure platform

Disclosure UK <https://www.abpi.org.uk/reputation/disclosure-uk/>

5.3 Disclosure language

English

6 Disclosure financial data

6.1 Currency

GBP

6.2 VAT included or excluded

Excluded

6.3 Calculation rules

N/A

7 Additional Information

