

# Johnson & Johnson: Methodological note for HCP/ORDM/HCO/PO and MoP disclosure 2025

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The information below describes the methodology that Johnson & Johnson (J&J) has applied to disclose the Transfers of Value (ToV) made to Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs), Healthcare Organisations (HCOs), Patient Organisations (POs) and Members of the UK Public (MOP) in the submission to the Association of British Pharmaceutical Industry (ABPI).

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## 1. Definitions

### 1.1 Recipients

**Healthcare professionals (HCPs)** includes any member of the medical, dental, pharmacy or nursing profession and any other person who in the course of their professional activities may administer, prescribe, purchase, recommend or supply a medicine.

**Healthcare organisation (HCO)** means either a healthcare, medical or scientific association or organisation such as a hospital, clinic, foundation, university or other teaching institution or learned society whose business address, place of incorporation or primary place of operation is in Europe or an organisation through which one or more health professionals or other relevant decision makers provide services

**Other relevant decision maker (ORDM)** particularly includes someone 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 is not a health professional.

HCP and ORDM status is determined based on the individual's role and activities at the time the Transfer of Value was made, and whether the individual is in scope under the applicable definitions.

If J&J is informed that a reportable recipient has passed away prior to publication of the disclosure, the associated ToVs are included within the aggregate section of the disclosure report for the relevant reporting period.

**Patient organisation** means an organisation mainly comprised of patients and/or caregivers or any user organisation such as a disability organisation, carer or relative organisation and

consumer organisation that represents and/or supports the needs of patients and/or caregivers.

## Members of the UK Public:

- **Patient:** An individual engaged by J&J because of the experience they have as a patient, this could include a digital opinion leader (vlogger, blogger, influencer).
- **Journalist:** An individual who writes in an official capacity for above or below the line media with a view to inform the public.
- **Member of the UK Public:** An individual who lives in the United Kingdom that is not a patient, or a journalist. For example, a caregiver, a family member of a patient, a digital opinion leader (vlogger, blogger, influencer), an academic or a health economist who are not considered an HCP or ORDM.

## 1.2 Kind of ToVs

The categories below describe how Transfers of Value are classified for disclosure purposes. Examples provided are illustrative and not exhaustive.

ToV Category	Included examples	Included Recipients
<b>Collaborative Working</b>	Improving patient pathways, service redesign.	HCOs
<b>Donations &amp; Grants</b>	Funding provided to HCOs & POs to support healthcare, scientific research, or education.  Grants are the provision of funds.  Donations may be physical items, services, and/or benefits-in-kind.	HCOs & POs
<b>Sponsorship (incl. events/meetings)</b>	Conference costs, exhibition support. Corporate benefits may include symposiums, advertising space and booth space.	HCOs & POs
<b>Contribution to Event Costs</b>	Travel, accommodation and registration of individuals.	HCPs, ORDMs, POs & MOPs
<b>Contracted Services</b>	Fees and related expenses for services such as advisory boards, speaker engagements, non-interventional studies that are retrospective in nature and patient support programmes.	HCPs, ORDMs, HCOs, POs & MOPs
<b>Research &amp; Development</b>	Clinical trials, non-clinical studies, non-interventional studies that are prospective in nature and involve the collection of patient data from or on behalf of individual, or groups of HCPs specifically for the study.	HCOs & HCPs

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- ToVs through professional conference organisers (PCO) are reported either in the name of the benefitting HCO or the name of the recipient PCO.
- ToVs related to patient support programmes are disclosed against the third-party HCO service provider.
- Research and Developments ToVs are disclosed in aggregate within the R&D category.
- Where J&J has contracted with individuals representing patient organisations to provide services, the ToV is disclosed against the Patient Organisation.

## 2. Disclosure's Scope

### 2.1 Products concerned

J&J will report all Transfers of Value in relation to prescription only medicines and will not include transfers of value that are solely related to over-the-counter medicines and medical devices.

### 2.2 Company concerned

Johnson & Johnson.

On 1 May 2024, Janssen-Cilag Ltd updated its brand identity in the UK. The Company has updated its brand to unite both its pharmaceutical and MedTech segments under the Johnson & Johnson brand name.

### 2.3 Excluded ToVs

The following ToVs are excluded:

- ToVs solely related to OTC medicines.
- ToVs where the recipient cannot be identified (e.g., blinded market research).
- Ordinary course purchases and sales of medicines.
- ToVs provided in accordance with Clauses 10.5, 10.6 & 19.2 of the ABPI Code of Practice.
- Payments to medical journals or publishing companies.
- Direct costs towards food and drinks to individuals. However please note that some catering costs may have been disclosed where costs for catering have been invoiced and charged for certain activities e.g., breakfast costs with hotel room rates.
- TOVs by a distributor/sales intermediary NOT made on behalf of/at the direction of a J&J Company will be disclosed by the distributor/sales intermediary and not by the J&J Company
- Third-party recipients of donations from independent charitable organisations which have themselves received donations from J&J and are not otherwise subject to disclosure. In the case of the Johnson & Johnson Foundation Scotland (an independent charity), any third-party recipients of donations from the Foundation will be published in its' audited annual directors' reports: <https://www.jnj.com/j-j-foundation>.

### 2.4 ToVs date

01.01.2025 – 31.12.2025.

## 2.5 Direct ToVs

- All payments made directly to recipients will be included in the calendar year in which J&J executed the payment or reimbursement in our financial systems.
- Out of pocket expenses paid directly to recipients are disclosed in the calendar year in which they were paid.

## 2.6 Indirect ToVs

- ToVs related to travel (e.g., flight and train tickets etc.), accommodation (e.g., hotel room cost), registration fees, will be included in the calendar year during which the activity/meeting took place.
  - If a Patient Organisation or individual representing a Patient Organisation performed a contracted service the related cost of travel, accommodation arrangements and any reimbursement of out-of-pocket expenses, as per the contract terms, are reported in the description of the activity.
- In cases of payments processed via a third party acting on behalf of J&J, our payment date to the third party or the payment date provided by the third party is used as the determining factor to allocate the payment to the related calendar year.

## 2.7 Non-monetary ToVs

J&J discloses benefits-in-kind to HCO's using the Fair Market Value stated in the contract and will be disclosed in the calendar year during which the activity took place.

J&J discloses benefits-in-kind as non-financial ToV to POs, calculated via an assessment of Fair Market Value and will be disclosed in the calendar year during which the activity took place.

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

- Cancellation fees are not reported.
- ToV in case of partial attendance are disclosed. For example, if an HCP/ORDM attended two of the three planned days of an event, the accommodation costs for those two days will be reported.

## 2.9 Cross-border activities

All European and global J&J affiliates have a duty to disclose all ToVs made to in scope recipients based in the UK.

## 2.10 R&D

Research & Development (R&D) ToVs to UK HCPs or HCOs that have been disclosed in aggregate are related to the planning or conduct of:

1. Non-clinical studies (as defined in the OECD Principles on Good Laboratory Practice)
2. Clinical trials (as defined in Regulation 536/2014)
3. 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

[N/A]

## 3. Specific considerations

### 3.1 Country unique identifier

J&J will report the recipients address in the J&J database at the time of reporting. If no current address is available within the database, J&J will disclose the address on the contract at the time the ToV took place, or the address provided at the time of registering for a given activity.

### 3.2 Self-incorporated HCP

- If an HCP/ORDM contracts with J&J through their private limited company and if any ToV is paid to the company in place of the HCP/ORDM, J&J will attribute the ToV to the individual HCP/ORDM and not the private limited company.
- If an HCP/ORDM contracts with J&J and the ToV is paid to the HCO that the HCP/ORDM is employed by, J&J will attribute the ToV to the HCO that received the ToV and not the HCP/ORDM.
- Individual expenses (e.g. travel & accommodation) will be attributed to the HCP unless stated otherwise in the contract.

### 3.3 Multi-year agreements

Where contracts span multiple years, each individual ToV is captured and disclosed in the corresponding year the ToV was made.

### 3.4 Country specificities

The link to J&J collaborative working executive summaries can be found on the J&J public website <https://www.jnj.com/innovativemedicine/uk/how-we-work/working-with-our-partners>.

### 3.5 Quality Checks

J&J applies proportionate internal data quality reviews in advance of disclosure of Transfers of Value. Reporting is largely system-generated and supported by reconciliation to relevant source data. In addition, targeted manual review and oversight activities are undertaken prior to publication.

## 4. Data protection legal basis

### 4.1 Consent collection

J&J discloses ToVs under legitimate interest.

### 4.2 Legitimate interests

J&J discloses based on legitimate interest.

- Where an HCP or ORDM has objected to disclosure on an individual basis, all associated ToV will be disclosed in the aggregate section of the report.

- HCOs and POs are disclosed on an individual named basis.
- Members of the UK public are disclosed on an aggregate basis in-line with the requirements of the ABPI Code of Practice.

## 5. Form of disclosure

### 5.1 Date of publication

30/06/2026

### 5.2 Disclosure platform

Healthcare Professional, Other Relevant Decision Maker, and Healthcare Organisation Disclosures	Disclosure UK – <a href="http://www.disclosureuk.org.uk">www.disclosureuk.org.uk</a>
Patient Organisation Disclosures	Johnson & Johnson website: <a href="https://www.jnj.com/innovativemedicine/uk/how-we-work/transfer-of-value">https://www.jnj.com/innovativemedicine/uk/how-we-work/transfer-of-value</a> .  * Date of contract = Activity start date
Members of the UK Public Disclosures	Johnson & Johnson website: <a href="https://www.jnj.com/innovativemedicine/uk/how-we-work/transfer-of-value">https://www.jnj.com/innovativemedicine/uk/how-we-work/transfer-of-value</a> .

### 5.3 Disclosure language

English

## 6. Disclosure financial data

### 6.1 Currency

- All values reported are in GBP.
- ToVs made in a currency other than GBP will be converted to GBP. Exchange rate details can be provided on a case-by-case basis.

### 6.2 VAT included or excluded

- Direct payments are disclosed exclusive of VAT and inclusive of withholding tax, if applicable.
- All ToVs for travel and accommodation (e.g., flight ticket, hotel room, etc.) are reported inclusive of VAT, where applicable.
- The disclosure reported ToV amounts should not be used for VAT/Tax reporting purposes. If fiscal reports are required, the company provides them directly to the recipient.

### 6.3 Calculation rules

J&J discloses benefits in kind using the fair market value listed in the contract between J&J and the recipient.

## **7. Additional Information**

J&J relies on a combination of automated systems, standardised processes, and manual data entry from internal and external sources to record and report relevant ToV data.

In case of significant changes to the initial publication (e.g., objection to individual disclosure), J&J will publish an amendment within a reasonable timeframe.

Should a recipient consider that the report is incomplete or incorrect, please contact us via [disclosure@janssen.co.uk](mailto:disclosure@janssen.co.uk). In addition, for queries relating to Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs) and Healthcare Organisations (HCOs), and as requested by the ABPI, please also submit a request via the ABPI central database to ensure the query is captured. We will review the query and, where appropriate, make updates in line with applicable disclosure requirements.