

Alliance Pharmaceuticals: Methodological note for HCP/ORDM/HCO disclosure 2025

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1 Definitions

1.1 Recipients

Healthcare Professional (HCP)

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. For the purposes of disclosure, the term also includes any employee of a pharmaceutical company whose primary occupation is that of a practising health professional.

Other relevant decision maker (ORDM)

Means a person 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.

Healthcare Organisation (HCO)

Any 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 HCPs or other relevant decision makers provide services.

Patient Organisation (PO)

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.

Certain PO ToVs are required to be separately disclosed on the Alliance Pharmaceutical website and a link to the relevant page provided on the Disclosure UK portal. However, no ToVs were made to Patient Organisations in scope of the ABPI code to disclose for 2025.

Research and Development (R&D)

For the purposes of disclosure, 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.

1.2 Kind of ToVs

Transfer of Value (ToV)

A direct or indirect payment, whether in cash, in kind, or otherwise, made, whether for promotional purposes or otherwise, in connection with the development or sale of medicines.

Collaborative working

Collaborative working which either enhances patient care or is for the benefit of patients or alternatively benefits the NHS and, as a minimum, maintains patient care is acceptable providing it is carried out in a manner compatible with the Code. Collaborative working is generally between one or more pharmaceutical companies, healthcare organisations and other organisations. Joint working is a limited form of collaborative working.

Collaborative and Joint working are activities listed in Alliance Pharmaceuticals Ltd. internal exclusions policy and therefore there are no values to disclose for this form of activity.

Donations and grants

For the purposes of this disclosure, Alliance has collectively defined donations and grants as providing funds, benefits-in-kind or services freely given for the purpose of supporting healthcare, scientific research or education, with no consequent obligation on the recipient organisation, institution and the like to provide goods or services to the benefit of Alliance in return. Donations to charities, similar recipient organisations, institutions and the like that would be funded by employee contributions are not disclosed.

Contribution of costs of events

Sponsorship

Sponsorship is defined as a contribution, financial or otherwise, in whole or in part provided by or on behalf of Alliance, towards an activity (including an event/meeting or material) performed, organised, created etc by a healthcare organisation, patient organisation or other independent organisation. For HCO sponsorship, contribution to cost of food and drink for a meeting/event is disclosed. For individual sustenance, this is not within the scope of ABPI disclosures as per the ABPI code.

Registration Fees

Payment of registration fees to support the attendance of an individual to a meeting/event organised or created by a company and/or independent organisation. This can include direct support of an individual HCP/ORDM or indirect support of HCPs/ORDMs not known to the company via the healthcare organisation.

Travel and accommodation

Payment for accommodation and travel expenses to support an individual to attend a meeting/event. This can include direct support of an individual HCP/ORDM or indirect support of HCPs/ORDMs not known to the company via the healthcare organisation.

Contracted service fees and expenses

In context of HCP/HCO ABPI disclosure, Health professionals, other relevant decision makers or their employers on their behalf and healthcare organisations may be used as consultants and advisors, whether in groups or individually, for services such as speaking at and chairing meetings, involvement in medical/scientific studies, clinical trials or training services, writing articles and/or publications, participation at advisory board meetings, and

participation in market research where such participation may involve remuneration and/or hospitality. These services are paid with a Fee for Service at Fair Market Value.

Research and Development

For the purpose of disclosure, research and development transfers of value are 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.

Costs that are subsidiary to these activities can be included in the aggregate amount.

2 Disclosure's Scope

2.1 Products concerned

Only transfers of value relating to prescription medicines (POM) and over-the-counter medicines (where the aim of promotion to HCP's/ORDM's is to encourage prescription or supply) have been included within this disclosure, and any transfers of value relating solely to over-the-counter medicines (with the aim to encourage purchase by MoP), medical devices, cosmetics or food supplements have not been included in this disclosure.

Where an activity involves transfers of value relating to both prescription medicines or OTC medicines promoted with the aim of prescription/supply, and to other categories of products (e.g., P, GSL etc.), only the Alliance budgetary allocation relating to the prescription medicine or OTC medicine promoted with the aim of prescription/supply will be included in this disclosure. Where there was no split in budgetary allocation, the total of the transfer of value has been split equally by the number of brands that were involved at that activity. In these instances, the split of budgetary allocation for such activities is available on request.

If a payment is not in relation to a specific product, such as an unrestricted grant, the payment is included in disclosure.

2.2 Company concerned

This disclosure relates to all payments made to UK HCPs/HCOs in 2025 from all companies within the Alliance Group globally.

2.3 Excluded ToVs

The following are not transfers of value for the purposes of the Code:

- 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

- transfers of value provided in accordance with Clauses 10.5, 10.6 and 19.2
- subsistence provided to health professionals and other relevant decision makers in accordance with Clause 10.1.

2.4 ToVs date

ToVs made to HCPs and HCOs during the 2025 calendar year (1st January to the 31st December 2025) were identified from the company's internal data collection process which is then verified against the Company's financial outgoings and contracts. Following submission, names and addresses are matched with the IQVIA One Key database.

ToVs payments (be it direct or indirect) will be disclosed according to the date the transaction was paid. This is applicable to multi-year/rolling and single contracts.

2.5 Direct ToVs

A direct transfer of value is one made directly by a company for the benefit of a recipient. This includes payments to HCPs/ORDMs under a fee for services contract paid to a company where that recipient is the sole shareholder, in addition to payments to HCO's where they consist of only one health professional or other relevant decision maker. In these circumstances, the ToV will be recorded against that recipient and not the company. Direct ToV include fee for service, expenses in relation to fee for service, support for registration fees and travel and accommodation.

2.6 Indirect ToVs

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. Where ToVs have been made to third-party organiser or other recipient on behalf of a HCO, the benefitting HCO will be disclosed. Where an event is organised on behalf of multiple HCOs without clarity on allocation, the value is divided equally between the HCOs.

Indirect ToVs include collaborative/Joint working, donations and grants, contribution to cost of events (including sponsorship of HCO's or third-party organisers, registration fees, travel and accommodation), contracted services (including fees for service and expenses).

2.7 Non-monetary ToVs

Non-monetary ToVs will be disclosed under the donations and grants section of the disclosure template. This excludes inexpensive education items such as pens, pencils and notebooks. Non-monetary ToVs include patient support items, staff time, benefits-in-kind Alliance Pharmaceuticals did not provide any non-monetary ToVs in 2025.

2.8 ToVs in case of partial attendances or cancellation and refund

Any transfer of value within scope of the ABPI code that relates to partial attendance, cancellation is included in disclosure. Refunds are not included in disclosure.

2.9 Cross-border activities

Cross-border activities that are in scope of the ABPI code have been included in disclosure. Alliance Pharmaceuticals employees are required to capture and report all ToVs to HCPs and HCOs with their primary practice in a country with EFPIA Code of Practice and/or other cross border transparency reporting requirements. The country of disclosure will be determined by the address of principal practice for HCPs and the address of registration for an HCO.

2.10 R&D

All ToVs related to the planning or conduct of non-clinical studies, clinical trials and non-interventional studies performed by Alliance Pharmaceuticals (including services performed by contractors not fulfilling a permanent role) or by Clinical Research Organisations on Alliance Pharmaceutical's behalf that are prospective in nature are considered Research & Development ToVs and are reported on an aggregate basis. Retrospective non-interventional studies or other studies that are not submitted to authorities as per local drug law do not fall under the category of R&D activities. The ToVs related to those studies will be reported as Fee for Service under name of the individual recipient.

2.11 Voluntary disclosure

Only disclosures that are required by the ABPI code are included. No voluntary disclosures are included in the disclosure values.

3 Specific considerations

3.1 Country unique identifier

Companies disclosing in the UK cannot submit professional identifiers (e.g. GMC number) to Disclosure UK but may use commercial identifiers. Alliance Pharmaceuticals does not use commercial identifiers.

3.2 Self-incorporated HCP

If a healthcare organisation consists of only one health professional or other relevant decision maker, then it would be subject to the requirements in the ABPI Code regarding individual health professionals.

3.3 Multi-year agreements

ToVs payments (be it direct or indirect) will be disclosed according to the date the transaction was paid. This is applicable to multi-year/rolling and single contracts.

3.4 Country specificities

Collaborative and joint working are not conducted by Alliance Pharmaceuticals and are listed in internal exclusions policy. Therefore, there are no ToVs relating to this activity type.

3.5 Quality Checks

Pre-disclosure is test validated and subsequently examined by a final signatory prior to data submission.

4 Data protection legal basis

4.1 Consent collection

Alliance Pharmaceuticals has historically relied on consent for publishing individual HCP transfer of value information. With effect from 2025, any new HCP agreement put in place utilised legitimate interest as the primary lawful basis for publishing individual HCP information.

For HCP engagements put in place before 2025, Alliance continues to rely on consent for those individuals until the relevant agreement is updated or superseded. Where consent is not granted or is withdrawn under such legacy arrangements, Alliance publishes those transfers in aggregate in accordance with applicable industry transparency frameworks.

Withdrawal of consent is respected without detriment for legacy consent-based disclosures. HCPs may withdraw consent at any time by contacting medinfo@alliancepharma.co.uk or dataprotection@alliancepharma.co.uk. Upon receipt, the team logs the request and works to withdraw their consent. Where technically feasible, Alliance removes the individual's name from future publications and from any online disclosures and re issues the relevant data in aggregate for subsequent reporting cycles. Historic publications made while consent was valid are generally retained to meet legal and audit obligations.

4.2 Legitimate interests

For contracts put in place with HCPs from 1 January 2025, Alliance Pharmaceuticals relies upon used Legitimate Interest as the lawful basis of disclosure. The company updated its HCP contract template to include a Transparency Statement to supplement Alliance's privacy policy, this explains the purpose and legal basis for processing relying on the legitimate interest ground to ensure this information is made expressly clear to the HCP. The Transparency Statement that supplements Alliance's Privacy Policy aims to manage the expectations of the individual in advance of transfers of value submission, demonstrate transparency in the processing of transfers of value, and help to meet the provisions of GDPR.

Alliance's lawyers completed a Legitimate Interest Assessment (LIA) on 24 May 2024 and concluded that Alliance's legitimate interest would be relied upon. The assessment documents the purpose, necessity and balancing test, and identifies safeguards. The legitimate interest pursued is enhanced transparency in healthcare industry interactions, supporting ethical conduct, accountability, and public confidence. Publication of individual transfer of value information is necessary to achieve meaningful transparency because aggregate disclosure alone does not sufficiently inform patients, the public, and institutions about potential conflicts of interest. The processing is limited to what is necessary to demonstrate value transfers, with data minimisation applied to exclude special category data and superfluous personal information.

The balancing test considered the potential impact on privacy against the strong public interest in transparency. Factors considered included the professional capacity of HCPs, the expectation of disclosure in light of industry norms and regulatory guidance, the non-sensitive nature of the data (financial transfers for professional services rather than health data), the provision of clear notice, and the availability of the right to object. The LIA concluded that Alliance's legitimate interest in transparency outweighs the privacy impact, particularly with the safeguards described below, and that publication is proportionate.

Based on the LIA, Alliance updated the HCP consultancy agreement template with clauses that: explain the intended publication of individual transfer of value information; identify legitimate interests as the primary lawful basis; and signpost the privacy policy. Alliance's privacy policy includes clear information about transparency reporting, the lawful bases relied upon, and contact details for the data protection team.

Right to object

Contracted individuals must have the chance to object to their personal data being processed in their particular situation. To meet this requirement, individuals can raise an objection through the disclosure portal or directly with Alliance Pharmaceuticals (via a specified email address in the provided Transparency Statement and Privacy Policy that is monitored during business hours). HCPs may object to processing based on legitimate interests at any time. Objections can be submitted to medinfo@alliancepharma.co.uk or dataprotection@alliancepharma.co.uk. Upon receipt, the team verifies identity and liaises with the legal team to handle the objection.

Objection handling under Legitimate Interest

If an individual objects, Alliance Pharmaceuticals must demonstrate whether it has compelling legitimate grounds for publishing the data on Disclosure UK that override the interests or the fundamental rights and freedoms of the objecting individual. To demonstrate whether or not this is the case, Alliance will repeat the balancing test under part 3 of the LIA based on the individual's particular situation. Response is given to the request without delay and at the latest within one month from receiving the request.

For objections raised directly with Alliance Pharmaceuticals (not via the disclosure portal), a query will be raised within the disclosure portal without delay and the data will remain suppressed until the query is closed. Portal queries will be closed in line with normal disclosure process and timings.

If the balancing test falls in favour of the individual, the relevant data will be moved into aggregate on Disclosure UK and the individual will be notified that this action has been taken.

If the balancing test falls in favour to reject the objection, the individual will receive a response from Alliance Pharmaceuticals within one month of receiving the request which will include reasons for the rejection.

Objections may be received from HCOs, although GDPR does not generally apply to organisations, there may be circumstances where the name of the organisation contains the name of the individual objecting to publication of the HCO value. The balancing test is carried out, as the disclosure will still likely be deemed personal data of the objecting individual and therefore the GDPR would apply.

Where HCO data is deemed personal data and balancing test falls in favour of the objecting individual, the disclosure HCO value will be disclosed under the individual rather than their limited company and subsequently is included in the HCP/ORDM aggregate value on Disclosure UK. Instances where HCOs have one shareholder, values will be disclosed using the process for individual disclosures.

5 Form of disclosure

5.1 Date of publication

30/06/2026

5.2 Disclosure platform

Disclosure UK – www.disclosureuk.org.uk

5.3 Disclosure language

Disclosure is made in English

6 Disclosure financial data

6.1 Currency

All disclosures have been made in GBP (£). Where payment was fulfilled in foreign currency, the value was converted to GBP based on the exchange rate at the time of payment using standard currency accounting rates.

6.2 VAT included or excluded

VAT has been included in the disclosed payments.

6.3 Calculation rules

No non-monetary ToVs for Alliance Pharmaceuticals have occurred in 2025. Not applicable.

7 Additional Information