

Vantive Limited

Methodological note for HCP/ORDM/HCO disclosure 2025

Data year: 2025

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Vantive Limited (“Vantive”) is a member of the national Association of the European Association of Pharmaceutical Industries and Associations (EFPIA). As a member, Vantive is obliged to comply with the Ethical Codes of Conduct, including, but not limited to, the Code on Disclosure of Transfers of Value from Pharmaceutical Companies to Healthcare Professionals and Healthcare Organisations (“Disclosure Code”). Being a company with very high compliance standards, Vantive shares the view of EFPIA and its national Associations that the transparency of interactions between the pharmaceutical industry and members of the medical community is in the interest of patients and other stakeholders and as well as the industry itself.

Vantive will disclose its transfers of value to Healthcare Professionals (“HCPs”) and Healthcare Organisations (“HCOs”) in line with the ABPI Code of Practice for the Pharmaceutical Industry Disclosure template.

With respect to interactions with HCPs and HCOs, Vantive follows the Vantive Global Interactions Policy (“Policy”).

In accordance with this Policy, Vantive’s interactions with the Medical Community and Government Officials must always occur in an ethical manner, in compliance with local laws, regulatory requirements and industry codes.

No one at Vantive may offer or provide anything of value to a member of the Medical Community or a Government Official either directly or through others with the intent to improperly influence or reward his or her decision to prescribe, purchase, recommend or use a Vantive product, therapy or service.

The purpose of this document is to explain the implementation of Vantive’s disclosure reporting. In order to protect its business, Vantive does not disclose commercially sensitive data.

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Definitions

Recipients

Healthcare Professionals (“HCPs”) as defined in the Disclosure Code

Any natural person that is a member of the medical, dental, pharmacy or nursing professions or any other person who, in the course of his or her professional activities, may prescribe, purchase, supply, recommend or administer a medicinal product and whose primary practice, principal professional address or place of incorporation is in Europe. For the avoidance of doubt, the definition of HCP includes: (i) any official or employee of a government agency or other organisation (whether in the public or private sector) that may prescribe, purchase, supply or administer medicinal products and (ii) any employee of a Member Company whose primary occupation is that of a practicing HCP, but excludes (x) all other employees of a Member Company and (y) a wholesaler or distributor of medicinal products.

Vantive will identify the HCP with the full name, city of principal practice, address, and country of practice.

Healthcare Organizations (“HCOs”) as defined in the Disclosure Code

Any legal person (i) that is a healthcare, medical or scientific association or organization (irrespective of the legal or organizational form) such as a hospital, clinic, foundation, university or other teaching institution or learned society (except for patient organizations within the scope of the FSA Code on Cooperation with Patient Organizations) whose business address, place of incorporation or primary place of operation is in Europe or (ii) through which one or more HCPs provide services.

Vantive will identify the HCO with the full name, city where registered, address and country of practice.

Kind of ToVs

Donations and Grants

Donations and Grants to HCOs that support healthcare, including donations and grants (either cash or benefits in kind) to institutions, organisations or associations that are comprised of HCPs and/or that provide healthcare Code on the Promotion of prescription-only medicines to, and Interactions with Healthcare Professionals (Name of local code).

- Programs to advance patient care
- Programs to foster medical science

Vantive will disclose all Transfers of Value provided to HCOs to support their missions, visions, goals and programming.

Events

Contribution to costs related to Events

- a. for HCOs: Contribution to costs related to Events, through HCOs or third parties, including sponsorship to HCPs to attend Events, such as:
 - i. Registration fees;
 - ii. Sponsorship agreements with HCOs or with third parties appointed by an HCO to manage an Event; and
 - iii. Travel and accommodation

- b. or HCPs: Contribution to costs related to Events, such as:
 - i. Registration fees; and
 - ii. Travel and accommodation

All promotional, scientific or professional meetings, congresses, conferences, symposia, and other similar events (including, but not limited to, advisory board meetings, visits to research or manufacturing facilities, and planning, training or investigator meetings for clinical trials and non-interventional studies) (each, an “Event”) organised or sponsored by or on behalf of a company.

Contribution to Costs of Events to HCOs (Sponsorship Agreements)

Contribution to Costs of Events include amongst others:

- Rental of booths at an “Event”;
- Advertisement space (in paper, electronic or another format);
- Satellite symposia at a congress;
- Sponsoring of speakers/faculty;
- If part of a package, drinks or meals provided by the organisers (included in the “Sponsorship Agreement”);
- Courses provided by a HCO (where Vantive does not select the individual HCPs participating).

In cases where Vantive sponsors an event, organized by a vendor, and the sponsorship is for more than one HCO, Vantive will disclose the Transfers of Value as follows:

If Vantive knows, which Transfer of Value the HCOs have received, Vantive will disclose the Transfers of Value on an individual basis for each HCO.

In cases where Vantive does not know the value each HCO has received, Vantive will divide the Transfers of Value by the number of HCOs supported and report equal shares of Transfers of Value per HCO.

Contribution to Costs of Events to HCPs

In case of indirect sponsorship of HCPs through HCOs, Vantive will disclose these Transfers of Values under Sponsorship agreement with HCOs.

Registration Fees

Vantive will disclose payment of registration fees.

Fees for Services and Consulting

Fees for Service and Consultancy to HCOs: Transfers of Value resulting from or related to contracts between Member Companies and institutions, organisations or associations of HCPs under which such institutions, organisations or associations provide any type of services to a Member Company or any other type of funding not covered in the previous categories. Fees, on the one hand, and on the other hand Transfers of Value relating to expenses agreed in the written agreement covering the activity will be disclosed as two separate amounts.

Fees for Service and Consultancy to HCPs: Transfers of Value resulting from or related to contracts between Member Companies and HCPs under which such HCPs provide any type of services to a Member Company or any other type of funding not covered in the previous categories. Fees, on the one hand, and on the other hand Transfers of Value relating to expenses agreed in the written agreement covering the activity will be disclosed as two separate amounts.

Fees for Services and Consulting include among others:

- Speakers' fees;
- Medical writing (unless the medical writing forms an integral part of an Investigator Initiated trial, then it will be disclosed as Research);
- Data analysis;
- Development of education materials;
- General consulting / advising;
- Unblinded market research;
- Retrospective non-interventional studies.

The following Transfers of Value, under Fees for Service and Consulting, will only be disclosed in the aggregate:

- Market research, where the identity of the participants is not known to Vantive. Aggregate disclosure of Transfer of Value provided to company conducting the market research. In these cases, Vantive will contractually oblige the market research company to make the disclosure in countries that require disclosure under local law.

Expenses include

- Travel: standard or first class for rail service and local transportation; economy class for air travel, with the option of upgrading up to business class for non-stop transcontinental flights longer than 6 hours.
- Accommodation: standard single room in a business class mid-scale hotel.

If a fee for service is paid to a legal entity owned by an individual HCP, Vantive will disclose the Transfer of Value under the name of the legal entity (considered as HCO).

Disclosure's Scope

Products concerned

Medicinal Products

ABPI Code of Practice for the Pharmaceutical Industry only demands disclosure in relation to medicinal products (pharmaceuticals), and not with respect to medical devices. Vantive being a diversified healthcare company, Vantive's franchises are often a combination of medicinal products, as referenced in the ABPI Code of Practice for the Pharmaceutical Industry Code of



Conduct, and medical devices, e.g. a consulting agreement could cover a therapy that relates to both. As it is often too complex to separate medicinal products and medical devices, Vantive has decided to over-disclose such that the interactions related to medical devices are included in Vantive's disclosure as well as interactions related to medicinal products. Therefore, the following data do not differentiate between transfers of value provided to HCPs/ HCOs in the context of pharmaceuticals in the one hand or in the context of medical devices on the other hand.

Company concerned

Vantive Limited is the reporting entity for United Kingdom and is responsible for the collection, validation and disclosure of Transfers of Value to HCPs and HCOs in accordance with the ABPI Code of Practice for the Pharmaceutical Industry.

Where Transfers of Value are made by other Vantive affiliates on behalf of the UK entity, or vice versa, such Transfers of Value are reported by the entity that has the contractual relationship with the recipient, ensuring no duplication of disclosure.

Excluded ToVs

Vantive excludes from disclosure only those Transfers of Value that fall outside the scope of the ABPI Code of Practice.

This includes:

- Transfers of Value solely related to over-the-counter (OTC) medicines
- Items of negligible value permitted under the ABPI Code
- Payments made in the ordinary course of business for the purchase and sale of medicinal products

Transfers of Value that are required to be disclosed under other legal or regulatory frameworks (e.g. public procurement or tender transparency requirements) are not excluded from disclosure under the ABPI Code, unless they clearly fall outside the definition of a Transfer of Value.

Vantive ensures that all in-scope Transfers of Value to HCPs and HCOs are disclosed in accordance with ABPI requirements, avoiding duplication where the same Transfer of Value could be reported through multiple channels.

ToVs date

The disclosures cover the dates between 01/01/2025 – 31/12/2025

Direct ToVs

Direct Transfers of Value are those made directly by Vantive to a HCP or HCO including payments made via bank transfer, reimbursement, or other direct financial mechanisms. These are recorded and disclosed individually where required under the ABPI Code.

Indirect ToVs

In case Transfers of Value are given to HCPs through HCOs, e.g. a sponsorship to an event, Vantive will disclose these Transfers of Values as “Transfers of Value to HCOs”.

Vantive will work to ensure that Transfers of Value will only be disclosed once, in particular where the recipient is a HCO and the beneficiary is a HCP.

Vantive will not report indirect transfers of value, e.g. through congress organizers, in cases where Vantive has no knowledge of the HCPs/HCOs chosen or has no influence on the selection of HCPs/HCOs.

Non-monetary ToVs

Non-monetary Transfers of Value include benefits in kind such as travel arrangements, accommodation, or event registrations provided directly by Vantive without a direct payment to the HCP or HCO.

These are disclosed based on the fair market value of the benefit provided, in accordance with the ABPI guidance.

ToVs in case of partial attendances or cancellation and refund

In cases of partial attendance, Vantive will disclose only the actual cost incurred. In case of cancellations:

- If costs are fully refundable and recovered, no Transfers of Value will be disclosed.
- If costs are partially refundable or non-refundable (e.g. late cancellation fees), the unrecovered portion will be disclosed as a Transfer of Value.

Cross-border activities

Vantive will disclose Transfers of Values in the country where the HCP or HCO, who receives the Transfers of Value, operates.

R&D

Research and Development Transfers of Value in each Reporting Period shall be disclosed by each Member Company on an aggregate basis. Costs related to events that are clearly related to activities covered in this section can be included in the aggregate amount under the “Research and Development Transfers of Value” category.

Transfers of Value to HCPs or HCOs related to the planning or conduct of (i) non-clinical studies (as defined in OECD Principles on Good Laboratory Practice); (ii) clinical trials (as defined in Directive 2001/20/EC); or (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, HCPs specifically for the study.

Vantive will disclose the Transfers of Value to HCPs or HCOs related to Research and Development in line with the Disclosure Code.

Voluntary disclosure

In the United Kingdom, disclosure of Transfers of Value to HCPs is based on consent where required under applicable data protection laws.

Where consent is not provided or is withdrawn, Vantive discloses the relevant Transfers of Value on an aggregate basis in line with the ABPI Code requirements.

Specific considerations

Country unique identifier

HCPs are identified using their full name and primary practice address. Where available, Vantive may also use unique identifiers such as General Medical Council registration number or other professional identifiers to ensure accuracy and avoid duplication.

Self-incorporated HCP

Where an HCP provides services through a legal entity (e.g. personal services company), the Transfer of Value is disclosed under the name of the legal entity (classified as an HCO), in accordance with BPI guidance.

Vantive applies a consistent approach based on the contracting party named in the agreement.

Multi-year agreements

For agreements spanning multiple reporting periods, Transfers of Value are disclosed in the year in which the payment is made, irrespective of when the services are performed.

Each payment is therefore reported in the relevant reporting period based on the payment date.

Country specificities

In line with the ABPI Code;

- Transfers of Value to HCPs are disclosed on an individual basis where consent has been obtained.
- Where consent is not available, disclosures are made on an aggregate basis.
- Transfers of Value to HCOs are disclosed on an individual basis without the requirement for consent.

Disclosure is made via the Disclosure UK platform.

Quality Checks

Vantive applies a robust control framework to ensure accuracy and completeness of disclosed data, including;

- Validation of data extracted from financial and operational systems,
- Cross-functional review,
- Reconciliation against contracts and supporting documentation,
- Final approval prior to publication

Any discrepancies identified post-publication are corrected in accordance with ABPI requirements.

Data protection legal basis

Consent collection

Vantive seeks explicit consent from HCPs for the disclosure of their personal data on an individual basis.

Consent is collected at the time of contracting and/or prior to the Transfer of Value being made, and records of consent are maintained in accordance with internal policies and applicable data protection laws.

Legitimate interests

Where permitted under applicable data protection laws, Vantive may rely on legitimate interests as a legal basis for processing personal data in connection with transparency reporting obligations.

Vantive ensures that such processing is necessary, proportionate, and balanced against the rights of the data subjects.

Form of disclosure

Date of publication

31/03/2026

Disclosure platform

Disclosure UK
www.disclosureuk.org.uk

Disclosure language

English

Disclosure financial data

Currency

The Transfer of Value being disclosed will be equal to the cost to Vantive converted into local currency.

VAT included or excluded

This cost will include any taxes paid on behalf of HCPs/HCOs and any VAT not recoverable by Vantive. The amount will exclude any VAT recoverable by Vantive.

Calculation rules

Amounts paid by Vantive in a foreign currency will be converted to the local currency using Vantive's monthly actual rates of currency translation. These are calculated at the beginning of each month based on market conditions.

Transfers of Value will be disclosed on the date that the payment leaves the Vantive bank account.

Additional Information

Transfers of Value disclosed reflect amounts paid during the reporting period and may not necessarily correspond to the timing of the underlying activity. All reasonable efforts have been made to ensure the accuracy of the disclosed data.

This methodological note is intended to provide clarity on how Vantive interprets and applies the ABPI Disclosure Code requirements in the United Kingdom.