

# Blue Earth Diagnostics: Methodological note for HCP/ORDM/HCO disclosure 2025

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## Introduction

Interactions between pharmaceutical companies and healthcare professionals (HCPs) and healthcare organisations (HCOs) are indispensable for the exchange of knowledge and the improvement of patient care. BED is fully committed to ensuring that these interactions meet the high standards of integrity and transparency expected by patients, governments, society and other stakeholders.

In the year 2024, Blue Earth Therapeutics Ltd (BET) and Blue Earth Diagnostics Ltd (BED) were disclosed together under Blue Earth Group (BEG). The 2024 disclosure therefore included Transfers of Value (ToVs) made by both BED and BET. From the 2025 reporting year onwards, BED disclose their ToVs separately and independently of BET under the heading “Blue Earth Diagnostics Ltd.”, and they are no longer reported under BEG.

BED complies with the obligation to identify, collate and disclose ToVs to healthcare professionals and healthcare organisations in accordance with the:

ABPI Code of Practice on disclosure of transfers of value to HCPs and HCOs and incorporates the requirements of the EFPIA Disclosure Code. For more information on the above-mentioned codes please visit <http://transparency.efpia.eu> or <http://www.abpi.org.uk>

This Methodological Note summarises the methodologies and business decisions as well as country specific considerations applied by Blue Earth Diagnostics when preparing its disclosure report. The report includes transfers of value by Blue Earth Diagnostics Ltd to healthcare professionals and healthcare organisations based in the United Kingdom.

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# 1 Definitions

## 1.1 Recipients

Any healthcare professional and healthcare organisation whose primary practice, principal professional address or place of incorporation is in the United Kingdom.

- Healthcare Professional (HCP)** is defined as 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 and whose business address, place of incorporation or primary place of operation is in the UK. In relation to the annual disclosure of transfers of value (Clause 28), the term also includes any employee of a pharmaceutical company whose primary occupation is that of a practising health professional.

ToVs made to retired HCPs or other relevant decision makers are disclosed where the activity relates to their professional expertise and falls within the scope of the ABPI Code.

In the year 2025, BED is not aware of any instances in which an HCP or other relevant decision maker is deceased at the time of submission in March 2026. Given data protection legislation only applies to information which relates to an identifiable living individual, if BED is contacted by next-of-kin or employer regarding information published on Disclosure UK about a deceased health professional, BED will handle these on a case-by-case basis.

- **Healthcare Organisation (HCO)** is 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 the UK or an organisation through which one or more healthcare professionals or other relevant decision makers provide services.

## 1.2 Kind of ToVs

BED follows the ABPI Code of Practice's definition of the reporting categories. The following table provides examples (list not exhaustive) of the specific activities reported under each category.

<b>Collaborative Working (which includes Joint Working)</b>	- BED did not participate in any Collaborative Working in 2025.
<b>Donations and grants to HCOs</b>	- BED did not provide any Charitable Donations or Grants to HCOs in 2025. - BED did not provide financial ToVs to UK HCOs in the form of R&D in 2025.
<b>Contribution to costs of events – sponsorship agreements with HCOs or with third parties appointed by a HCO to manage an Event</b>	- Funding an event in exchange for the placement of a brand logo in a conference program or invitation communication. - Funding an event in return for a display booth or projection area at the event. - Satellite symposia at a congress. - Funding or support of HCO website in return for space to publish educational or promotional content or link to any BED website. - Other advertisement space (in paper, electronic or another format).  Note: Catering costs are only included in the disclosed ToV if they form part of the sponsorship package.  Note: In cases where BED sponsors an event and the payment is made via a third-party event management provider, the ToV is disclosed under the relevant HCO where the sponsorship is intended to support that HCO.
<b>Contribution to costs of events – registration fees</b>	- Registration fees paid for HCPs/HCOs to attend third-party educational events.  Note: BED does not charge registration fees for its own events. Logistical costs e.g., hire of facilities associated with BED stand-alone events are not disclosed.
<b>Contribution to costs of events – travel and accommodation</b>	- Travel (e.g., flight, train, taxi, mileage reimbursement, parking). - Accommodation.

	Note: Travel and accommodation costs related to services or research & development activities are not covered in this category.
<b>Contracted Services – Fees</b>	<ul style="list-style-type: none"> <li>- Speaker engagements.</li> <li>- Advisory boards and other consulting engagements.</li> <li>- Data analysis, medical writing and development of educational materials.</li> <li>- Other research-related services (if not falling under the definition of Research and Development*).</li> </ul>
<b>Contracted Services – expenses</b>	<ul style="list-style-type: none"> <li>- Travel (e.g. flight, train, taxi, mileage reimbursement and parking).</li> <li>- Accommodation.</li> </ul> <p>Note: Where expenses are immaterial or cannot be disaggregated from the service fee without unreasonable effort they are disclosed under “Fees for Services and Consultancy” category.</p>
<b>Research and development</b>	<ul style="list-style-type: none"> <li>- Fee for investigator activities related to research and development.</li> <li>- Funding of investigator-initiated research.</li> <li>- Activities contracted to CROs, where indirect ToVs are made to HCPs/HCOs.</li> <li>- Research collaborations.</li> </ul> <p>Note: Research and Development ToVs: <i>ToVs to HCPs/HCOs related to the planning or conduct of (i) non-clinical studies (as defined in the OECD Principles of GLP), (ii) clinical trials (as defined in Regulation 536/2014), or (iii) non-interventional studies that are <u>prospective</u> in nature and that involve the collection of patient data from or on behalf of individual or groups of HCPs specifically for the study (Clause 24.6 SI of the ABPI Code).</i></p>

## 2 Disclosure’s Scope

### 2.1 Products concerned

The ToVs disclosed relate to all activities associated with BED’s areas of research and commercial operations for all prescription-only medicines and medicines under development.

### 2.2 Company concerned

This disclosure covers ToVs made by Blue Earth Diagnostics Ltd (BED) during the 2025 reporting period. It does not include ToVs made by any other affiliated companies, which disclose separately where applicable. BED does not have subsidiary companies based in the UK or EU.

Up to and including the 2024 reporting year, ToVs made by BED were disclosed under Blue Earth Group (BEG). From the 2025 reporting year onwards, BED discloses independently. Historical disclosures can therefore be identified under the name Blue Earth Group for reporting year 2024.

### **2.3 Excluded ToVs**

The following ToVs are not included in BED's disclosure report:

- ToVs excluded from the scope of the ABPI's Disclosure Requirements, such as informational and educational materials, items of medical utility, food and beverage, medical samples,
- ToVs which are part of the ordinary course of purchase and sale of medicinal products, such as discounts, price reductions and other trading devices,
- Payments made to Contract Research Organisations (CROs), unless (i) the CRO meets the definition of a Health Care Organisation under the ABPI Code, or (ii) the payment constitutes an indirect ToV through the CRO to the benefit of an HCP/HCO.

### **2.4 ToVs date**

This disclosure report includes all ToVs disclosed had a payment made between 1st January 2025 and 31st December 2025. These payments can include some activities conducted in 2024 where payment was made in 2025.

### **2.5 Direct ToVs**

Direct ToVs are defined as those made directly by BED to the benefitting Recipient.

In general, ToVs are reported at the level of the first identifiable Recipient which falls under the definition of an HCP/HCO. Each ToV is disclosed only once in order to avoid duplication.

### **2.6 Indirect ToVs**

Indirect ToVs are defined as those made on behalf of BED for the benefit of a Recipient, or made through an intermediary (e.g. a meeting organiser), where BED knows or can identify the benefitting Recipient.

ToVs made through third parties are disclosed as follows:

- ToVs to HCOs through a third party are disclosed under the HCO (e.g. sponsorship provided to a medical association through an event organiser).
- ToVs to individual HCPs through a third party are disclosed under the HCP (e.g. travel arrangements made through a travel agency).
- ToVs to self-incorporated HCPs are disclosed under the individual HCP.
- ToVs to individual HCPs/HCOs through a third party for the purpose of R&D are disclosed in aggregate as part of the R&D disclosure.

### **2.7 Non-monetary ToVs**

BED discloses non-monetary Transfers of Value.

Where a benefit has been provided to a recipient in the form of services rendered by in-house expertise, to ensure full transparency, the disclosed value is calculated based on the number of hours provided multiplied by the relevant employee hourly pay rate. No additional employment-related costs (e.g., pension or National Insurance contributions) are included in the disclosed amount.

Where a benefit has been provided in the form of doses or precursor materials of our products for R&D purposes, the value is calculated using the projected commercial price. Considering the nature and the constraints of supply, valuating the doses using the value of the raw material or cost of goods was not only unfeasible due to manufacturing variations but would also undervalue the actual cost of the ToV. The calculation of the total ToV was attained by multiplying the projected commercial value of each dose by the number of doses used by each study.

In the year 2025, BED did not provide non-monetary ToV to UK recipients.

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

Where a planned activity is partially attended, cancelled, or subject to refund, BED discloses the ToVs based on the actual costs incurred during the reporting period.

If costs have been incurred and are not recoverable (e.g. cancellation fees), such amounts are disclosed where they constitute a ToV to a Recipient. Where costs are fully refunded prior to disclosure, no ToV is reported.

In cases of partial attendance, only the proportion of the cost directly attributable to the participating Recipient is disclosed.

In the year 2025, there were no cases of partial attendances, cancellations, or refunds for UK Recipients.

## **2.9 Cross-border activities**

ToVs are disclosed in the country where the Recipient has their primary practice, principal professional address or its place of incorporation.

The disclosure report includes all ToVs to Recipients based in the United Kingdom, including ToVs made by foreign affiliates and ToVs related to events taking place outside the United Kingdom.

## **2.10 R&D**

The ToVs for R&D conducted by BED to the UK entities in 2025 are declared as an aggregate.

R&D ToVs include those associated with the planning and conduct of non-clinical studies, clinical trials and non-interventional studies that are prospective in nature, as well as related clinical research activities. This includes, where applicable, the provision of study medication and associated support provided in connection with such research.

Research collaborations that fall within the scope of the ABPI Code definition of R&D, including collaborative clinical research activities, are included within the aggregate R&D disclosure. These are reported in aggregate as they relate to the development of medicinal

products and are therefore not disclosed on an individual named basis in accordance with the Code.

In the year 2025, there were no cases of ToVs to UK HCPs or UK HCOs related to the planning or conduct of these forementioned studies.

### **2.11 Voluntary disclosure**

BED has disclosed ToVs in accordance with the requirements of the ABPI Code. No additional voluntary disclosures beyond those required under the Code have been included.

## **3 Specific considerations**

### **3.1 Country unique identifier**

BED identifies recipients by name and principal practice address in accordance with the ABPI Code. Country-specific unique identifiers (such as professional registration numbers or company registration numbers) are not included in this disclosure.

### **3.2 Self-incorporated HCP**

Where a HCP provides services through a self-incorporated limited company, BED discloses the relevant ToVs under the name of the individual HCP.

This approach is taken where the services provided are attributable to the individual HCP and in accordance with the definitions set out in the ABPI Code.

In cases where it is unclear whether a company is a self-incorporated HCP company or a larger organization that may qualify as a HCO, BED will undertake reasonable due diligence, including contacting the relevant HCP where appropriate, to determine the correct recipient classification. Where classification remains unclear following these steps, the ToV will be disclosed under the HCO recipient category.

### **3.3 Multi-year agreements**

All contracts with HCPs run on an annual basis. In the UK, no multi-year contracts are in place.

### **3.4 Country specificities**

Where BED participates in activities with other pharmaceutical companies, each company is responsible for disclosing its own ToV in accordance with the ABPI Code. Where costs are shared, BED discloses only the portion of the ToV attributable to its contribution. In the year 2025, there were no instances where this occurred.

BED did not participate in any Collaborative Working projects during the 2025 reporting period. Accordingly, no collaborative working executive summaries are required or included in this disclosure.

### **3.5 Quality Checks**

Prior to submission and publication, BED undertook internal quality checks of the 2025 disclosure data by a dedicated internal employee, trained on ToVs.

This included reconciliation of ToV against financial records and supporting documentation, verification of recipient details, and review of categorisation in line with the ABPI Code requirements.

The disclosure was subject to a separate internal review by another internal employee. All ToVs were reported against company governance procedures prior to submission.

## **4 Data protection legal basis**

### **4.1 Consent collection**

BED advocates transparency and encourages Recipients to grant consent to full disclosure.

BED requests consent for each activity and for HCPs this has been given at the same time as contracts signed for each activity undertaken with BED. BED discloses the ToV in the aggregate section of the disclosure report if:

- the Recipient dissents to the disclosure of the data,
- the Recipient only grants partial consent,
- no response from the Recipient is received on time,
- the Recipient withdraws consent at any point during the year.

Consent is voluntary and can be withdrawn at any time in writing to [Medical@blueearthdx.com](mailto:Medical@blueearthdx.com).

Recipients may also contact BED at [Medical@blueearthdx.com](mailto:Medical@blueearthdx.com) to request further information about, or corrections to, the published data.

### **4.2 Legitimate interests**

BED relies on consent, not legitimate interests, as the lawful basis for the disclosure of certain recipient information.

## **5 Form of disclosure**

### **5.1 Date of publication**

09/03/26

### **5.2 Disclosure platform**

Disclosure UK – [www.disclosureuk.org.uk](http://www.disclosureuk.org.uk)

### **5.3 Disclosure language**

English

## 6 Disclosure financial data

### 6.1 Currency

GBP. If a foreign currency needs conversion to local currency (GBP), the Bloomberg exchange conversion rate is used on the day of the transaction.

### 6.2 VAT included or excluded

ToVs disclosed include VAT where a HCO/HCP or Company charges BED VAT.

### 6.3 Calculation rules

ToVs are valued at the cost amount to BED and not by reference to the Recipient's revenue.

Where a ToV relates to internal resource time (e.g. medical writing support provided in connection with R&D activities), the value disclosed is calculated using the applicable daily payroll cost rate, pro-rated to reflect the number of hours attributable to the activity. The calculation is based on actual time recorded during the reporting period.

For the calculation of non-monetary ToVs, please see ***Disclosure's Scope > Non-monetary ToVs*** above.

## 7 Additional Information

BED has no additional information to disclose beyond that set out in this Methodological Note.