

# HCP/ORDM/HCO Methodological Note Template



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# Thornton & Ross Limited Methodological note for HCP/ORDM/HCO disclosure 2025

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Thornton & Ross Limited (T&R) is a part of STADA Arzneimittel AG, specialising in the manufacture and sale of a range of generic and speciality (biosimilar) pharmaceutical products. T&R believes transparency and honesty are essential in maintaining and upholding confidence in our products and the pharmaceutical industry. T&R regularly collaborates with various Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs) and Healthcare Organisations (HCOs) in the interests of patients. These collaborations are essential for the continuous improvement of patient care and the sharing of knowledge which may be relevant to clinical decision making.

T&R are committed to ensuring transparency is always respected. Acting with integrity is one of STADA's core business values, ensuring the way T&R conducts business with openness and to the highest ethical standards, in caring for people's health as a trusted partner.

T&R is not a member of the Association of the British Pharmaceutical Industry (ABPI). However, T&R has voluntarily chosen to follow the principles and spirit of the ABPI Code of Practice and associated transparency requirements and to align its disclosure of transfers of value with ABPI/PMCPA standards as far as is reasonably practicable

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# 1 Definitions

## 1.1 Recipients

This methodological note details the approach taken by T&R with regards to the collection and submission of all Transfers of Value (ToVs) to HCPs, ORDMs and HCOs based in the United Kingdom (UK), as mandated in the Association of the British Pharmaceutical Industry (ABPI) Code of Practice.

ToVs made to Patient Organisations and members of public, including journalists and patients, are disclosed on T&R's corporate website. Links to the relevant pages can be found on the Disclosure UK website.

**Health professional (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. In relation to the annual disclosure of transfers of value (ABPI Code of Practice Clause 28), the term also

includes any employee of a pharmaceutical company whose primary occupation is that of a practising health professional.

**Healthcare organisation (HCOs):** 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 the United Kingdom or an organisation through which one or more health professionals or other relevant decision makers provide services.

**Other relevant decision maker (ORDMs):** includes an individual within the NHS who is not an HCP but who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply, or use of any medicine.

## 1.2 Kind of ToVs

T&R follow the ABPI Code of Practice definition of the reporting categories. The following table provides examples (list not exhaustive) of the specific activities reported under each category, to the extent reportable under the ABPI Code.

<b>Reporting category</b>	<b>Examples of specific activities</b>
Donations and grants to HCOs	<ul style="list-style-type: none"> <li>- Charitable contributions</li> <li>- Grants and donations (in cash or in kind) for the purpose of supporting healthcare, scientific research, or education</li> </ul>
Contribution to costs of Events: Registration Fees	<ul style="list-style-type: none"> <li>- Registration fees paid for HCPs to attend third-party educational events</li> </ul>
Contribution to costs of Events: Travel and accommodation	<ul style="list-style-type: none"> <li>- Travel (e.g., flight, train, taxi, mileage reimbursement, parking)</li> <li>- Accommodation</li> <li>- Travel and accommodation expenses associated with supporting HCPs to attend third party conferences/company funded meetings</li> </ul>
Contracted Services: Fees & Associated Expenses	<ul style="list-style-type: none"> <li>- Speaker engagements</li> <li>- Advisory boards</li> <li>- Consultancy arrangements</li> <li>- Data analysis, medical writing, and development of educational materials</li> <li>- Travel and accommodation expenses associated with the contracted services engagement</li> </ul> <p>For fee for service and consultancy arrangements, T&amp;R uses STADA Fair Market Value (FMV) benchmarks as part of its internal approval process.</p>
Sponsorship and Educational Support	<p>ToVs provided to HCOs or to a third-party agency on behalf of an HCO with regards to the cost of events</p> <p>For example:</p> <ul style="list-style-type: none"> <li>- Funding an event in return for a display booth or Stand area at the event</li> <li>- Satellite symposia at a congress</li> </ul>
Research & Development	<p>Note: T&amp;R does not have any activities to report which fall within the scope of required reporting under this category under the ABPI Code.</p> <p>Note: ToVs related to research activities which do not fall under the definition of Research &amp; Development (e.g. retrospective non-interventional studies) are not covered in this category.</p>

## 2 Disclosure's Scope

### 2.1 Products concerned

The ToVs included in this disclosure relate to T&R's prescription only medications and associated scientific or educational activities.

### 2.2 Company concerned

This report includes ToVs made by T&R and STADA affiliates to HCPs, ORDMs and HCOs based in the United Kingdom that fall within the scope of the ABPI Code.

ToVs made through third parties (for example, event organisers) in connection with activities funded by T&R are treated as ToVs by T&R and are disclosed.

Relevant external engagements and funding requests are subject to review and approval by T&R's External Activities Review Board (EARB), which also oversees the use of FMV benchmarks for fee for service and consultancy arrangements.

### 2.3 Excluded ToVs

ToVs excluded from the scope of disclosure include:

- Medical items and ancillaries that are provided to patients free of charge that are required for the administration of T&R medicines are excluded from our disclosure.
- ToVs which are part of the ordinary course of purchase and sale of medicinal products, such as discounts and price reductions.
- Subsistence is not within the scope of the ABPI disclosure obligations and as such no costs associated purely with subsistence have been disclosed, unless included in a 'day delegate rate' and T&R have been unable to separate the subsistence cost from the room hire.
- Hospitality for purely internal company meetings with no external HCPs/HCOs present.
- Transfers exclusively to non-UK recipients with no UK practice or registered address.
- Transfers relating solely to over-the-counter (OTC) activities that are clearly outside the scope of the ABPI Code are excluded.

### 2.4 ToVs date

ToVs disclosed are those that have a reporting date between 1<sup>st</sup> January 2025 and 31<sup>st</sup> December 2025.

The reporting date for monetary ToVs is the date on which the payment was made, defined as the date on which funds are transferred to the recipient or on their behalf, irrespective of when the activity/event occurred. T&R does not normally enter multi-year contractual arrangements or make pre-payments for reportable activities. Any exceptional reimbursement or non-standard payment structure is treated according to this payment-date principle, applied consistently.

## **2.5 Direct ToVs**

A direct transfer of value is one made directly by a company for the benefit of a HCP / HCO / ORDM recipient. The types of activities resulting in direct transfers of value include:

- Fees and expenses paid for contracted services
- Sponsorship contributing to events and meetings
- Donations and grants
- Direct contributions to registration fees, 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 HCP / HCO / ORDM recipient or through an intermediate and where the company knows or can identify the recipient that will benefit from the transfer of value. The types of activities resulting in indirect transfers of value include via a third-party event organiser or agency on behalf of T&R.

## **2.7 Non-monetary ToVs**

T&R has not provided any benefits in kind and non-monetary ToVs in 2025. However, where applicable non-monetary transfers of value would only be provided where they are clearly justified, have a legitimate purpose and are compliant with anti-bribery and corruption requirements.

Where reportable under the ABPI Code, such transfers would be assigned an appropriate monetary value using T&R's financial processes and would be disclosed under the relevant ABPI category.

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

In the case of full cancellation of an activity, and where an HCP, ORDM or HCO has not received a ToV, the ToV has not been reported. In the case of partial attendance, any ToVs received by an HCP/ORDM, T&R discloses the net benefit retained by or on behalf of the recipient, applying this approach consistently.

T&R has not needed to request for a ToV refund due to partial attendance or cancellations in 2025.

## **2.9 Cross-border activities**

T&R is part of the STADA Arzneimittel AG group of companies and operates globally via affiliates and partners. Cross border ToV payments are communicated internally and reconciled locally to ensure all relevant UK ToVs are included within this disclosure. The focus of disclosing affiliate activity is based on relevant therapeutic area as there are multiple UK affiliates. Transfers of value to UK-based HCPs and HCOs are disclosed in the UK, irrespective of where the funding originated. Recipient location (principal practice for HCPs; registered address for HCOs) determines disclosure in the UK.

For fee for service and consultancy arrangements, STADA Fair Market Value (FMV) rates are used as part of the approval and control process, including where activities involve affiliates.

Any payments made in Euros have been converted to Great British Pounds Sterling (GBP) based on the Euro to GBP 2025 Average exchange rate provided by the European Central

Bank. This value is 0.86 GBP to 1 Euro. Any payments made in another currency have been exchanged based on the average 2025 conversion rate. The above exclusion criteria apply for cross-border payments.

## **2.10 R&D**

T&R has not engaged in any Research & Development activities which are reportable under the ABPI Code in 2025.

## **2.11 Voluntary disclosure**

T&R's disclosure is aligned with the scope of the ABPI Code. Any voluntary disclosures beyond the Code, if introduced, will be described in the relevant year's methodological note.

# **3 Specific considerations**

## **3.1 Country unique identifier**

T&R uses unique identifications (IDs) from their internal HCP / HCO master data and from the commercial databases of Wilmington Healthcare in its systems to support accurate identification and reduce the risk of duplication. These identifiers are used for internal processing to reduce the risk of duplication. These IDs are used to disclose ToVs provided to individual HCPs and ORDMs.

## **3.2 Self-incorporated HCP**

Where an HCP operates through a limited company, T&R classifies and discloses the transfer of value in accordance with ABPI definitions and internal legal and compliance guidance, either as an HCP or HCO transfer as appropriate, and applies this consistently.

## **3.3 Multi-year agreements**

Not applicable. T&R does not typically enter multi-year contractual arrangements for reportable activities.

## **3.4 Country specificities**

Not applicable, T&R did not participate in any Collaborative Working in 2025.

## **3.5 Quality Checks**

T&R applies proportionate quality checks to its disclosure process, including:

- Any requests for external engagements involving ToVs are reviewed and approved in advance by an internal review committee at T&R, the External Activities Review Board (EARB) which is recorded.
- Compliance and Medical Affairs teams keep a record of ToVs they have recorded for 2025.
- Extraction of relevant data from Accounts Payable, expense and relevant functional records.

- Consolidation and standardisation of recipient details and categorisation of transfers of value according to ABPI categories.
- Cross-checking of data including review for obvious duplicates and correction where identified.
- Reasonableness checks and limited sampling against source documents (for example, contracts, invoices, EARB approvals).

## **4 Data protection legal basis**

### **4.1 Consent collection**

T&R currently uses consent-based processing for HCP personal data, which are processed in accordance with UK data protection law and T&R/STADA data protection policies.

Contracts, invitations and event materials presented to HCPs include transparency wording explaining ABPI disclosure and how personal data will be used, together with a mechanism to grant or withhold consent to named disclosure where required.

Consent status is recorded. Where consent is granted, HCPs are disclosed by name. Where consent is refused, withdrawn or not obtained, the relevant transfers are included in aggregate. If consent is withdrawn after publication, T&R follows internal procedures and applicable guidance to amend the disclosure where appropriate.

### **4.2 Legitimate interests**

T&R currently relies primarily on consent for the named disclosure of HCP personal data. T&R is, however, in the process of moving to a legitimate interest legal basis for such disclosures from 2026 onwards, in line with applicable data protection law and relevant ABPI/PMCPA guidance.

Once implemented, this will include completion of an appropriate balancing test, provision of clear information to HCPs about the use of legitimate interests (including their right to object), and the establishment of processes to manage any objections received.

## **5 Form of disclosure**

### **5.1 Date of publication**

[30/06/26

### **5.2 Disclosure platform**

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

T&R may also publish information on its own corporate website where appropriate: [thorntonross.com](http://thorntonross.com) .

### **5.3 Disclosure language**

English

## **6 Disclosure financial data**

### **6.1 Currency**

Disclosures have been made in Great British Pounds Sterling (GBP). ToVs paid in Euros have been converted to GBP using the 2025 annual average European Central Bank rate of 1 Euro = 0.86 GBP. Where a transfer of value is incurred or paid in another currency, it is converted into GBP using a defined foreign exchange rate (for example, a rate on or around the payment date or a standard monthly rate). The same approach is applied consistently for the reporting period.

### **6.2 VAT included or excluded**

Where applicable, disclosure of payments does not include VAT. Cross border ToVs may or may not include VAT depending on the data submitted to T&R from Affiliates.

The treatment of VAT and any other material tax aspects is applied consistently across the dataset and follows the ABPI expectation that companies explain their VAT approach in their methodological note, aligned with T&R policy.

### **6.3 Calculation rules**

Monetary transfers of value are disclosed as the GBP amount paid or incurred on behalf of the recipient, in line with the currency and VAT approach described above. For fee for service and consultancy, FMV benchmarking used within the EARB process forms part of the internal compliance framework, but the disclosed amount reflects the actual payment.

Non-Monetary Transfers - Not Applicable – There were no 'non-monetary' transfers of value provided in 2025.

## **7 Additional Information**

This methodological note is reviewed periodically and updated where necessary to reflect changes in ABPI requirements, guidance or T&R processes.