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# Almirall Ltd: Methodological note for HCP/ORDM/HCO disclosure 2025

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Interactions between pharmaceutical companies and Healthcare Professionals (HCPs), Healthcare Organizations (HCOs), and Patient Organizations (POs) are essential to establishing and maintaining the supply of medicinal products. Almirall Ltd (hereafter 'Almirall') recognises that such interactions must be conducted with integrity and must be transparent in order to foster understanding and, ultimately, build trust in the legitimacy of industry engagement with healthcare professionals.

Accordingly, Almirall fully supports the principle of transparency and complies with the requirements of both the ABPI Code and the EFPIA (European Federation of Pharmaceutical Industries and Associations) Code regarding the disclosure of Transfers of Value (ToV) made in 2025 to Healthcare Professionals, Healthcare Organizations, and Patient Organizations.

Almirall has taken every reasonable step to ensure that all required data are disclosed and that it complies with all applicable laws, guidance, and regulations. Almirall also expects third parties and business partners to apply equivalent standards in any professional activities conducted on its behalf.

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# 1 Definitions

## 1.1 Recipients

**Healthcare Organisation (HCO):** any legal entity (i) that is a healthcare, medical or scientific association or organization 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 (ii) through which one or more HCPs provide services. All associated transfer of values have been disclosed accordingly.

**Healthcare Professional (HCP):** 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/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 the United Kingdom. All associated transfer of values have been disclosed accordingly.

**Patient Organisation (PO):** non-for-profit legal person/entity/charity (including the umbrella organisation to which it belongs), mainly composed of patients and/or caregivers, that represents and/or supports the needs of patients and/or caregivers and which business address, place of incorporation or primary place of operation is in the United Kingdom. All associated transfer of values have been disclosed accordingly.

**Retired Health Professionals:** If a transfer of value was associated with a retired health professional and could not be disclosed on a named basis, it would instead be reported in aggregate. However, Almirall confirms that no such transfers of value exist to disclose.

**Other Relevant Decision Makers (ORDM):** The term ‘other relevant decision makers’ particularly includes those 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 are not health professionals. All associated transfer of values have been disclosed accordingly.

**Deceased Health Professionals:** Data protection legislation only applies to information which relates to an identifiable living individual. Information relating to a deceased person does not constitute personal data and therefore is not subject to data protection legislation.

If a transfer of value was associated with a deceased health professional, then this would be disclosed on a named basis.

Whilst it might be lawful to publish this information, Almirall will remain sensitive to such a case. If Almirall is contacted by next-of-kin or employer regarding a transfer of value related to a deceased health professional, Almirall would handle these on a case-by-case basis. If it could not be disclosed on a named basis, it would instead be reported in aggregate. However, Almirall confirms that no such transfers of value exist to disclose.

## 1.2 Kind of ToVs

**Donations and grants:** collectively, mean providing funds, assets or services freely given for the purpose of supporting healthcare, scientific research or education, with no consequent obligation on the recipient to provide goods or services to the benefit of the donor in return. All associated transfer of values have been disclosed accordingly.

**Collaborative working:** as defined in the ABPI Code of Practice, collaborative working refers to pharmaceutical companies working with other organisations to deliver initiatives which either enhance patient care or are for the benefit of patients or alternatively benefit the National Health Service (NHS) and, as a minimum, maintain patient care. Almirall has not undertaken any collaborative working and therefore has no such transfers of value to disclose.

**Contribution to costs related to events and related expenses:** is a support providing or covering the costs of meals, travel, accommodation and/or registration fees to support the attendance of an individual HCP or PO Representative to an event organized or created by any company of Almirall and/or a third party. All associated transfer of values have been disclosed accordingly.

**Events:** All professional, promotional, scientific, educational 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) organized or sponsored by or on behalf of any company of Almirall. All associated transfer of values have been disclosed accordingly.

**Contracted services, fees, consultancy and related expenses:** ToVs resulting from or related to contracts between Almirall and any HCP or HCO under which such HCP or HCO provide any type of services to Almirall. All associated transfer of values have been disclosed accordingly.

**Research and Development:** 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 Regulation 536/2014); and (iii) Non-Interventional Studies (NIS) 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. All associated transfer of values have been disclosed accordingly.

**Sponsorship:** is a support provided by or on behalf of Almirall, when permitted by law, as a contribution to support an activity (including an Event) performed, organized or created by a HCO, a PO or a third party. All associated transfer of values have been disclosed accordingly.

## 2 Disclosure's Scope

### 2.1 Products concerned

Almirall's disclosure applies to transfers of value made in the context of activities which are completely or partially related to Prescription Only Medicines (POMs). Such activities comprise donations and grants, scientific and professional meetings (sponsorships, costs for registration, travelling and accommodation), services and consultancies (fees and related costs), and Research & Development. Transfer of values related to over-the-counter medicines or medical devices have not been included.

### 2.2 Company concerned

These disclosures relate to transfers of value made by Almirall Ltd, which does not have any subsidiaries.

The rationale for cross-border transfers of value incurred by Almirall's parent company, Almirall S.A., and any other overseas Almirall affiliates is detailed in Section 2.9.

### 2.3 Excluded ToVs

Almirall has not disclosed transfer of values related to items which have been mentioned in section 2.1 "Products concerned". These are related to over-the-counter medicines and, in addition, meals (subsistence).

### 2.4 ToVs date

All transfers of value taking place in 2025 have been disclosed. Any data relating to 2025 which was available up to March 2025 has been included in this report.. For pending invoices related to events that took place during 2025, all invoices paid up to March 2025 have been included in the 2025 disclosures.

### 2.5 Direct ToVs

The disclosure includes transfer of values made by Almirall to Healthcare Professionals whose principal address is in the United Kingdom and to Healthcare Organizations and Patient Organizations whose social address is in the UK.

### 2.6 Indirect ToVs

Indirect transfers of value provided to HCPs or HCOs by third parties on behalf of Almirall (e.g., travel agencies) are assigned to the according HCP or HCO and disclosed accordingly independent of the fact that the ToV was transferred on the bank account of the HCP/HCO or on the bank account of the third party. The third party has not be disclosed.

## **2.7 Non-monetary ToVs**

The disclosure of non-monetary transfers of value is made at the equivalent value in monetary terms, for example staff time. No non-monetary transfers of value took place during the reporting period, therefore there are no such items to be disclosed.

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

There were no cases of partial attendance and therefore these have not been reported in the 2025 disclosure. ToVs that did not ultimately take place or were cancelled have not disclosed as no benefit was received by the HCP, HCO or PO.

## **2.9 Cross-border activities**

Where Almirall Ltd's parent company Almirall S.A., or any other Almirall affiliate engages with a UK HCP, HCO or PO which results in a ToV; the respective Almirall entity engaging the service is required to record the engagement in the Customer Relation Management (CRM) system to ensure that the transaction is captured for disclosure by Almirall Ltd. All such transfers of value have been included in this report.

## **2.10 R&D**

Costs that are related to research and development have been included in the aggregate R&D category.

Almirall discloses payments agreed with universities and research centres for pre-clinical research as well as clinical trial agreements in HCOs (either direct payments or through a third-party), fees of independent professionals to provide research and development services, and investigator's meeting expenses.

Fees related to study work have been disclosed on an individual basis under the category "fees for services".

## **2.11 Voluntary disclosure**

Almirall's disclosures do not go beyond what is required by the ABPI Code of Practice. Therefore, there are no such disclosures to be detailed.

# **3 Specific considerations**

## **3.1 Country unique identifier**

Almirall maintains an up-to-date database which allows HCPs to have more than one practicing address associated with them, for example when an HCP works at different centres / hospitals etc. For the purposes of disclosure, the CRM only recognises one address - the principal practice address.

## **3.2 Self-incorporated HCP**

Almirall considers legal entities with self-incorporated HCPs as an HCO. The only exception to this is where there is a single HCP behind the incorporated entity. ToVs to such legal entities are disclosed individually, subject to the lawful basis for processing.

## **3.3 Multi-year agreements**

Where agreements, sponsorships, clinical studies, or similar activities span more than one calendar year, these are disclosed in the year in which the related activity is performed. As a result, payments may be spread across multiple years.

## **3.4 Country specificities**

When Almirall engages another pharmaceutical company to promote a medicine on its behalf, for which Almirall is the marketing authorisation holder, the transfers of value are

disclosed by the pharmaceutical company that is the contracting entity with the HCP, HCO, or PO.

In regards to collaborative working, as mentioned in section 1.2, Almirall has not undertaken any such activities in 2025 and therefore has no such transfers of value to disclose.

### **3.5 Quality Checks**

Prior to reporting, Almirall internal processes ensure Transfer of Value made to HCP, HCO or PO are correctly collected in Almirall.

Data quality checks are performed to ensure any HCP & (HCO as appropriate) who has not provided consent for individual disclosure are reported in 'aggregate' and additional data and process monitoring takes place for quality assurance prior to reporting.

## **4 Data protection legal basis**

### **4.1 Consent collection**

Almirall is using Legitimate Interest as it's legal basis for the disclosure of transfers of value (see section 4.2).

### **4.2 Legitimate interests**

For 2025, Almirall has adopted the lawful basis of legitimate interest for the disclosure of transfers of value. Health Care Professionals (HCPs) retain the right to object, in accordance with the rights granted under the UK Data Protection Act and the European GDPR Regulation.

With regard to the management of objections to legitimate interest: In line with Data Privacy principles, all data subjects are informed of their right to object to the processing of their data on this basis. Objections may be submitted via email to [DisclosureUKIE@almirall.com](mailto:DisclosureUKIE@almirall.com). All objections are reviewed by the Head of Compliance, and the outcome is communicated to the data subject within 5 days of submission.

## **5 Form of disclosure**

### **5.1 Date of publication**

31/03/2026

### **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**

All disclosed ToV data is reported in GBP. ToVs provided in currencies other than GBP are converted to GBP using the exchange rate of the spend date. This is an automatic conversion that takes place in the Almirall disclosure database.

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

VAT (Valued added Tax) is included in the disclosure data where applicable, for instance some HCOs will charge VAT which is disclosed as part of the relevant ToV.

### **6.3 Calculation rules**

Almirall has not provided any benefits in kind or non-monetary values to HCPs, HCOs and PO's during 2025.

## **7 Additional Information**

Almirall has no additional information to be provided.