

Besins Healthcare: Methodological note for HCP/ORDM/HCO disclosure 2025

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1 Definitions

1.1 Recipients

Health Professional (HCP)

Health professionals (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, the term also includes any employee of a pharmaceutical company whose primary occupation is that of a practising health professional.

Healthcare Organisation (HCO)

A healthcare organisation (HCO) is 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 Europe or an organisation through which one or more healthcare professionals or other relevant decision makers provide services.

Other Relevant Decision Maker (ORDM)

The term 'other relevant decision maker' (ORDM) particularly includes someone 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 is not a health professional.

1.2 Kind of ToVs

Contribution to costs of Events

Costs declared include registration fees and travel and accommodation in relation to financial support of HCPs and ORDMs to attend meetings. Costs related to subsistence (food and beverages) to HCPs are not required to be declared.

Fees for contracted services and associated related expenses agreed in the fee for service

This includes the following services: speaker and chairperson fees, consultancy fees and training.

Sponsorship agreements with HCOs/third party organisations appointed by HCOs to manage an event

BHUK discloses all payments made to healthcare organisations and third-party organisations in relation to events / meetings. This includes direct funding such as sponsorship fees and fees paid to erect an exhibition stand, and indirect support via organisations managing an event/meeting on behalf of the HCO. Disclosure includes subsistence (food and beverages) in relation to sponsorship to a HCO, institution or other organisation in relation to their own event

Donations and Grants

Donations and Grants to HCOs that support healthcare, including donations and grants to institutions, organisations or associations that are comprised of HCPs and/or that provide healthcare. For financial grants the date of the TOV has been recorded as the date the payment was processed by BHUK.

Collaborative working

BHUK was not involved with any collaborative working projects with HCOs in 2025.

Patient organisations

There are no disclosures in scope of this category in 2025.

2 Disclosure's Scope

2.1 Products concerned

There are no disclosures in scope of this category for 2025

2.2 Company concerned

Besins Healthcare UK Limited (BHUK) is committed to transparent interactions with Health Professionals (HCPs) and Healthcare Organisations (HCOs).

BHUK is committed to communicating transfers of value made to HCPs and HCOs in a transparent manner. In doing so, all reasonable efforts will go into making sure they are accurate, valid and complete. BHUK complies with all laws, rules and regulations. Laws in the European Union protect the rights of citizens in relation to the way their personal data is processed. HCPs are covered by Data Privacy laws, and this affects the way in which BHUK can publish the HCP's transfers of value.

2.3 Excluded ToVs

There are no ToVs which have been excluded from the disclosures.

2.4 ToVs date

All required TOVs made in the UK from 1st January 2025 to 31st December 2025.

2.5 Direct ToVs

Types of activities fee for service under consultancy agreement, Sponsorship

2.6 Indirect ToVs

This does not apply to ToV for 2025

2.7 Non-monetary ToVs

This does not apply to ToV for 2025

2.8 ToVs in case of partial attendances or cancellation and refund

This does not apply to ToV for 2025

2.9 Cross-border activities

All disclosures are made in the country in which the HCP or HCO practice is located. Payments made to a UK based HCP or organisation by Besins entities located in other countries are disclosed within the UK, regardless of the source of funding.

2.10 R&D

All payments related to research and development are disclosed

2.11 Voluntary disclosure

This does not apply to ToV for 2025

3 Specific considerations

3.1 Country unique identifier

This is not used at Besins Healthcare

3.2 Self-incorporated HCP

The details provided on the agreement which is signed is giving Besins Healthcare the permission to use the information

3.3 Multi-year agreements

When BHUK has contracted with an HCP, ORDM or HCO for a period that spans more than 1 calendar year, only transfers of value executed during the calendar year will be included in the disclosure. The remainder of the contract values will be disclosed in future relevant disclosure periods.

3.4 Country specificities

This does not apply for ToV for 2025.

3.5 Quality Checks

Data were collected, reconciled, and reported on the BHUK disclosure template. This tracker is used by BHUK to track payments to HCPs, ORDMs and HCOs within all EFPIA member countries.

All financial TOVs were reconciled against the contractual agreements, the tracker recordings and the actual payments made.

4 Data protection legal basis

4.1 Consent collection

The details provided on the agreement which is signed is giving Besins Healthcare the permission to use the information

4.2 Legitimate interests

BHUK relies on legitimate interests as the lawful basis on which it processes personal data including the personal data of the Consultant in relation to such disclosures

5 Form of disclosure

5.1 Date of publication

30/03/2026

5.2 Disclosure platform

<http://www.disclosureuk.org.uk/>

5.3 Disclosure language

English

6 Disclosure financial data

6.1 Currency

GBP

6.2 VAT included or excluded

Where payments were made and VAT was applicable, the VAT has been excluded for the purposes of disclosure. Therefore, all values provided are exclusive of VAT. There are no other tax considerations.

6.3 Calculation rules

The date recorded for the TOV is the date the payment was processed by BHUK.

7 Additional Information

For other enquiries related to the information in either this Methodological Note or the 2025 Disclosure Report please contact: information@besins-healthcare.com.