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BioMarin Europe Limited: Methodological note for HCP/ORDM/HCO disclosure 2025

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The pharmaceutical industry is committed to preserving the integrity of Disclosure UK and transparency in our interactions with HCPs, ORDMs, and HCOs.

This methodological note, which accompanies the Report, summarises BioMarin's approach in calculating and reporting the figures stated in the ABPI central platform submission. This note shall be published together with the Report. The reason for publishing this note is to better inform external recipients and readers of the Report and enable them to understand the data contained in the Report and how this data was collected.

Contents

1	Definitions	2
1.1	Recipients	2
1.2	Kind of ToVs	3
2	Disclosure's Scope	4
2.1	Products concerned	4
2.2	Company concerned	4
2.3	Excluded ToVs	5
2.4	ToVs date	5
2.5	Direct ToVs	5
2.6	Indirect ToVs	5
2.7	Non-monetary ToVs	5
2.8	ToVs in case of partial attendances or cancellation and refund	6

2.9	Cross-border activities	6
2.10	R&D	6
2.11	Voluntary disclosure	7
3	Specific considerations	7
3.1	Country unique identifier	7
3.2	Self-incorporated HCP	7
3.3	Multi-year agreements	7
3.4	Country specificities	8
3.5	Quality Checks	8
4	Data protection legal basis	8
4.1	Consent collection	8
4.2	Legitimate interests	8
5	Form of disclosure	8
5.1	Date of publication	8
5.2	Disclosure platform	9
5.3	Disclosure language	9
6	Disclosure financial data	9
6.1	Currency	9
6.2	VAT included or excluded	9
6.3	Calculation rules	10
7	Additional Information	10

1 Definitions

1.1 Recipients

This subsection defines the individuals and organisations within scope of disclosure. The definitions reflect the ABPI Code and clarify how BioMarin determines recipient classification.

Healthcare Professionals (HCPs)

An HCP includes members of the medical, dental, pharmacy and nursing professions, and any other person who, in the course of their professional activities, may administer, prescribe, purchase, recommend or supply a medicine, and whose principal professional address is in the United Kingdom.

Other Relevant Decision Makers (ORDMs)

ORDMs include individuals, particularly those with an NHS role, who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply or use of a medicine but who are not health professionals. ORDMs are disclosed within the HCP reporting framework.

Healthcare Organisations (HCOs)

An HCO is a healthcare, medical or scientific association or organisation — such as a hospital, clinic, foundation or university — whose address, place of incorporation or primary place of operation is in Europe, or an organisation through which one or more HCPs or

ORDMs provide services. Where an HCP operates through a personal service company, the treatment described in Section 3.2 is applied.

Patient Organisations

Patient Organisations are not classified as HCOs for the purposes of transparency reporting. Where applicable, Transfers of Value provided to Patient Organisations are disclosed separately in accordance with ABPI requirements.

1.2 Kind of ToVs

This subsection defines the categories of Transfers of Value that may be disclosed under the ABPI Code. A Transfer of Value (ToV) can be a salary, fee or remuneration for a service provided by a HCP, ORDM or HCO to BioMarin. Expenses incurred during the execution of a service (e.g. travel and accommodation) are also considered ToV. Donations and sponsorships provided to HCPs or HCOs are also considered to be ToV. Direct ToV are those made directly by BioMarin for the benefit of a recipient and indirect ToV are those made on behalf of BioMarin for the benefit of a recipient, or ToV made through an intermediate and where BioMarin knows or can identify the HCP/HCO that will benefit from the ToV.

Donations and Grants

Donations and Grants are funds, benefits in kind or services freely given to Healthcare Organisations for the purpose of supporting healthcare, scientific research or medical education, with no consequent obligation on the recipient to provide goods or services to BioMarin in return.

These may include:

- Financial grants to support educational or scientific initiatives
- Charitable donations to HCOs
- Benefits in kind, including provision of services or resources

Donations and Grants are not provided to individual HCPs for personal benefit.

Contribution to Costs of Events

BioMarin may sponsor HCPs to attend congresses or events to enhance their medical and/or scientific knowledge and their use of medicines. In this context, sponsorship covers congress registration, travel, accommodation and meals; the HCP does not receive any compensation, as no service is provided. BioMarin may also sponsor a third-party event in exchange for services such as an exhibition booth or satellite symposium.

BioMarin supports continuing medical education and may provide support to HCPs or HCOs to cover the costs of registration fees for HCPs to attend certain independent congresses. Such arrangements are generally paid directly to a travel or logistics third party.

Fees for Service and Consultancy

BioMarin engages HCPs or HCOs in exchange for monetary compensation and/or a benefit in kind for purposes such as:

- Consulting or advising services
- Speaker activities
- Medical writing (e.g. editorial support for scientific publications)
- Data analysis
- Development of educational materials
- Participation in market research (where identity is known and remuneration is provided)

Service agreement related Transfers of Value may include fees or honoraria, as well as expenses incurred in the course of providing the services, such as travel and accommodation.

Related Expenses

Related Expenses include travel (flights, train, car hire, parking and mileage reimbursement), accommodation and other reasonable, documented expenses incurred in connection with the provision of services or with a sponsorship arrangement. BioMarin pays for or reimburses HCPs for such reasonable and documented expenses.

Research and Development (R&D)

Research and Development activities are those undertaken to discover and develop new therapies to treat patients suffering from severe diseases, including clinical trials designed to verify or study the clinical effects of one or more medicinal products and to identify any adverse reactions, as well as partnerships with academia and leading drug discovery foundations. R&D Transfers of Value are disclosed in aggregate.

Collaborative Working

Where applicable, Collaborative Working refers to initiatives in which BioMarin works with HCOs or other organisations to deliver projects that benefit patients or support the NHS. Related Transfers of Value are disclosed in the relevant financial category depending on the nature of the transfer.

2 Disclosure's Scope

2.1 Products concerned

This subsection specifies the product scope of BioMarin's disclosure.

BioMarin discloses Transfers of Value relating to prescription-only medicines for human use. Transfers connected exclusively to non-medicinal products are excluded unless disclosure is required under applicable law.

2.2 Company concerned

This subsection clarifies which BioMarin legal entities are included within the UK disclosure.

This disclosure covers Transfers of Value made by BioMarin Europe Limited in the United Kingdom. Transfers made by other BioMarin affiliates to recipients whose principal professional address or registration is in the United Kingdom are also included where applicable.

2.3 Excluded ToVs

This subsection outlines categories of value that are excluded from disclosure in accordance with the ABPI Code.

Transfers of Value related to meals (food and beverages) are not disclosed in the Report pursuant to Clause 24, although such meals complied with the limitations set forth in Clause 22. In addition, the following are not disclosed where applicable:

- Informational and educational materials of negligible value
- Samples of medicinal products
- Logistical costs solely related to BioMarin-organised meetings

Where a cost forms an inseparable part of a reportable Transfer of Value, it is included.

2.4 ToVs date

This subsection explains the methodology used to determine the reporting period for Transfers of Value.

BioMarin applies a consistent recognition approach. For direct payments, the payment date is used; for indirect Transfers of Value, the date of the event is used. Research & Development payments: the payment date is used.

Only Transfers of Value occurring between 1 January 2025 and 31 December 2025 are included in the 2025 disclosure (published in 2026).

2.5 Direct ToVs

This subsection defines Transfers of Value made directly by BioMarin to a recipient.

Direct Transfers of Value are those made directly by BioMarin for the benefit of a recipient. The recipient recorded is the natural or legal person receiving the payment, subject to the treatment of personal service companies described in Section 3.2.

2.6 Indirect ToVs

This subsection explains how BioMarin identifies and discloses Transfers of Value made through third parties.

An indirect Transfer of Value is one made on behalf of BioMarin for the benefit of a recipient, or made through an intermediary, where BioMarin knows or can identify the HCP, ORDM or HCO that will benefit. Examples include travel and accommodation arranged through a third party, and registration fees paid via congress organisers, where the benefiting recipient is identifiable.

2.7 Non-monetary ToVs

This subsection explains how BioMarin treats Transfers of Value provided in kind rather than through direct financial payment.

Non-monetary Transfers of Value (benefits in kind) are subject to the same transparency principles as monetary payments. Where goods or services are obtained from a third party, the invoiced cost is disclosed. Non-monetary Transfers of Value are disclosed within the appropriate ABPI reporting category based on the nature of the activity.

Non-monetary Transfers of Value may include:

- Internal BioMarin personnel time allocated to Collaborative Working initiatives
- Provision of services or professional support
- Educational or scientific support delivered in kind
- Grants or donations provided in the form of goods, equipment or software

Non-monetary Transfers of Value are disclosed within the appropriate ABPI reporting category based on the nature of the activity.

2.8 ToVs in case of partial attendances or cancellation and refund

This subsection outlines BioMarin's treatment of cancellations, no-shows and partial attendance so that disclosure reflects value actually received.

Where no benefit is received due to cancellation or no-show, the associated Transfer of Value is not disclosed. Contractual cancellation fees paid directly to an HCP or HCO are disclosed. In cases of partial attendance, only the benefit actually received is reported, and where refunds occur, disclosure reflects the net value transferred.

2.9 Cross-border activities

This subsection clarifies how BioMarin determines the country of disclosure for Transfers of Value involving cross-border elements.

Transfers of Value are disclosed in the country where the recipient's principal professional address (for HCPs and ORDMs) or registration address (for HCOs) is located. Transfers made by non-UK BioMarin affiliates to UK recipients are included in the UK disclosure.

2.10 R&D

This subsection defines the activities categorised as Research and Development and explains the aggregate reporting approach.

R&D Transfers of Value are not attributed to individual recipients, reflecting the scientific and collaborative nature of such activities.

R&D Transfers of Value include those related to the planning or conduct of:

- Non-clinical studies (as defined in OECD Principles on Good Laboratory Practice)
- Clinical trials (as defined under applicable UK or EU legislation)
- Prospective non-interventional studies involving the collection of patient data
- Investigator Sponsored Research
- Activities conducted by Clinical Research Organisations (CROs) on behalf of BioMarin
- Data monitoring committee participation related to clinical studies.

In accordance with the ABPI Code, R&D Transfers of Value are disclosed in aggregate and are not attributed to individual recipients. This reflects the scientific and collaborative nature of such activities.

Where a study is retrospective in nature and does not meet the ABPI definition of R&D, related Transfers of Value are disclosed at individual level under Fees for Service.

BioMarin applies documented internal classification and review processes to ensure consistent categorisation of R&D activities and alignment with Code definitions.

2.11 Voluntary disclosure

This subsection confirms BioMarin's approach to disclosure beyond mandatory ABPI requirements.

BioMarin complies fully with all mandatory disclosure obligations under the ABPI Code and does not currently disclose additional voluntary categories of Transfers of Value. Where disclosure requirements evolve, BioMarin will update its methodology and reporting practices accordingly.

3 Specific considerations

3.1 Country unique identifier

This subsection explains BioMarin's approach to ensuring accurate and consistent recipient identification.

BioMarin uses a structured recipient identification process to ensure Transfers of Value are attributed to the correct HCP, ORDM or HCO and to prevent duplication. Professional registration numbers are not submitted to Disclosure UK in accordance with UK requirements.

BioMarin applies internal validation checks to confirm recipient classification and avoid misattribution or duplicate reporting across reporting cycles.

3.2 Self-incorporated HCP

This subsection clarifies BioMarin's approach where HCPs provide services through personal service companies.

Where an HCP provides services through a personal service company and is the sole director and sole shareholder of that entity, Transfers of Value are disclosed against the individual HCP. Where the entity comprises multiple healthcare professionals or decision makers, Transfers of Value are disclosed against the HCO.

3.3 Multi-year agreements

This subsection explains how BioMarin treats agreements spanning multiple reporting periods.

Where an agreement extends across more than one calendar year, only Transfers of Value paid or provided during the 2025 reporting period are disclosed in the 2025 Report. Disclosure is based on the date of payment for direct payments and the date of the event for indirect Transfers of Value, regardless of when the contract was executed.

3.4 Country specificities

This subsection outlines UK-specific reporting considerations.

In the United Kingdom, HCOs are reported without the need for consent, as they are legal entities. Other UK-specific considerations are addressed in the relevant sections of this note.

3.5 Quality Checks

This subsection outlines the controls applied across the lifecycle of transparency data, from collection through publication.

BioMarin applies internal controls to support the completeness and accuracy of its disclosure, including reconciliation of data against financial records, recipient classification and duplicate checks, and compliance review prior to submission to Disclosure UK.

4 Data protection legal basis

4.1 Consent collection

This subsection explains the lawful basis BioMarin relies upon for individual-level disclosure.

BioMarin has used its best endeavours to seek consent from all HCPs to report on an individual basis, naming the HCP and identifying the Transfer of Value. To this end, BioMarin has incorporated a binding clause to this effect in its contractual templates and has obtained consents on a per-activity basis.

Where an HCP declines to give, or subsequently withdraws, consent to report, BioMarin discloses all Transfers of Value made to that HCP in aggregate. In the United Kingdom, HCOs are reported without the need for consent as they are legal entities.

4.2 Legitimate interests

This subsection addresses the potential use of Legitimate Interests as a lawful basis.

BioMarin relies on consent as the lawful basis for individual-level disclosure of Transfers of Value to HCPs and ORDMs in the United Kingdom and does not rely on Legitimate Interests for this purpose. Where consent is not available, withdrawn or otherwise not valid, Transfers of Value are disclosed in aggregate in accordance with ABPI requirements.

5 Form of disclosure

5.1 Date of publication

This subsection confirms the timing of publication.

BioMarin's Report is made publicly available on the Disclosure portal at the end of June each year and captures Transfers of Value provided during the previous calendar year. The 2025 disclosure is published no later than 30 June 2026, covering Transfers of Value made between 1 January 2025 and 31 December 2025.

5.2 Disclosure platform

This subsection identifies the public platform used for publication.

BioMarin submits its disclosure via the ABPI's central transparency platform:

Disclosure UK – www.disclosureuk.org.uk

Disclosure UK provides a searchable public database of Transfers of Value made by pharmaceutical companies operating in the United Kingdom.

BioMarin does not separately publish its HCP/HCO disclosure data on its corporate website, except where required by law or ABPI guidance.

5.3 Disclosure language

This subsection confirms the language used for publication.

BioMarin's disclosure is made in English, consistent with ABPI requirements for UK reporting.

6 Disclosure financial data

6.1 Currency

This subsection confirms the reporting currency and conversion approach.

Disclosure is made in British Pounds (GBP). Where Transfers of Value were made in any other currency, the exchange rate used is based on the payment date for direct payments or the date of the event for indirect payments.

6.2 VAT included or excluded

This subsection confirms BioMarin's treatment of VAT and other taxes.

BioMarin reports Transfers of Value as net amounts, excluding Value Added Tax (VAT) and any applicable withholding tax, unless the collection of net values is not possible through BioMarin's financial systems.

Where VAT or other taxes cannot reasonably be separated from the total invoiced amount, the gross amount is disclosed.

This methodology is applied consistently across all disclosure categories.

6.3 Calculation rules

This subsection explains the calculation conventions applied in preparing the disclosure.

Transfers of Value are aggregated per recipient and per reporting category in accordance with the ABPI disclosure template. BioMarin applies the following principles:

- Only Transfers of Value made between 1 January 2025 and 31 December 2025 are included.
- For direct payments, the payment date determines inclusion; for indirect Transfers of Value, the date of the event is applied.
- Research and Development Transfers of Value are disclosed as a single aggregate figure.
- Where payments are made in foreign currencies, conversion to GBP is performed.
- VAT is excluded; taxes relating to accommodation and travel are included.

7 Additional Information

For any questions relating to this Methodological Note or BioMarin's disclosure of Transfers of Value, please contact BioMarin Europe Limited, 10 Bloomsbury Way, London WC1A 2SL.