

HCP/HCO Methodological Note Template



Version: [March 2026]

Country: [UK]

Boehringer Ingelheim Limited]: Methodological note for HCP/ORDM/HCO disclosure [2025 Data]

Data year: [2025]

Year of publication: [2026]

[Boehringer Ingelheim Ltd is committed to the disclosure of Transfers of Value (“ToV”) made to Healthcare Professionals (“HCPs”), Other Relevant Decision Makers (“ORDMs”) and Healthcare Organisations (“HCOs”). These interactions and collaborations take place as the HCPs, ORDMs and HCOs offer expert knowledge on patients’ behaviours and management of diseases. This knowledge plays a large role in Boehringer Ingelheim’s commitment to improving patient care and treatment options, essential for enhancing patient outcomes.

Boehringer Ingelheim compensate HCPs, ORDMs and HCOs that we work with for their valuable insights and time which they offer to us. We also provide funding for medical education; this can be directly to the HCPs, via HCOs or via third party specialist providers.

Boehringer Ingelheim’s expectation is that by disclosing its ToV (such as payments and other benefits in kind e.g travel and accommodation costs), made to HCPs and HCOs, it will enhance the public’s knowledge and understanding of why interactions are necessary to improve patient care.

In line with the Association of the British Pharmaceutical Industry Code (“ABPI Code”), Boehringer Ingelheim publicly disclose the ToV it makes to HCPs, ORDMs and HCOs.

Boehringer Ingelheim is committed to transparency and proud of the relationship that it has with HCPs, ORDMs and HCOs, as we believe that it plays a vital role in developing life-enhancing and life-saving medicines through sharing knowledge to improve patient outcomes.

Contents

1	Definitions	2
---	-------------------	---

1.1	Recipients	2
1.2	Kind of ToVs	3
2	Disclosure's Scope	5
2.1	Products concerned	5
2.2	Company concerned	5
2.3	Excluded ToVs	6
2.4	ToVs date	6
2.5	Direct ToVs	6
2.6	Indirect ToVs	6
2.7	Non-monetary ToVs	6
2.8	ToVs in case of partial attendances or cancellation and refund	7
2.9	Cross-border activities	7
2.10	R&D	7
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	8
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	9
5.1	Date of publication	9
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	9
7	Additional Information	10

1 Definitions

1.1 Recipients

[Healthcare Organisation (HCO): 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 health professionals or other relevant decision makers provide services.

Healthcare Professional (HCP): A 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.

Other Relevant Decision Makers (ORDM): Someone with a current or former decision making or influencing (particularly including some-one with an NHS) role who could influence (at national, regional or local commissioning or reimbursement organisations or bodies) in any way the administration, consumption, prescription, purchase, recommendation, sale, supply or use of any medicine but who is not a health professional.

Independent Medical Education Companies (IME) IME companies are entities that provide platforms where HCPs have access to medical education which are often supported via sponsorship from pharmaceutical companies.

Professional Conference Organisers (PCO) Entities that organise Healthcare events and coordinate sponsorship payments from pharmaceutical companies on behalf of HCOs.

Professional Society (HCO) Professional societies are groups of HCPs that come together to share learnings and education within their peer group. These are considered HCOs under the Code.

The employment status of a HCP or ORDM does not affect the Company's disclosure obligations, thus engagements and fees to HCPs who subsequently retire in that calendar year fall within scope of disclosure.

Information relating to a deceased HCP or ORDM does not constitute personal data and therefore is not subject to data protection legislation. In following the principles of transparency, the company has taken the decision in the first instance to publish this data on Disclosure UK. However, in the event that Boehringer is contacted by a next of kin or employer regarding the published information, the company will review its decision on a case-by case basis and consideration will be given to removing the information from Disclosure UK

1.2 Kind of ToVs

[Collaborative working, including Joint Working

The Industry Code of Practice describes collaborative working as 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.

Boehringer Ingelheim produces a 'PID' (Project Initiation Document), which is a summary document of the project outline that demonstrates the equitable contributions from all parties involved in the Joint (Collaborative) Working Project. Any administrative or set-up costs (paid to third parties in relation to such projects) will be included in this figure. For multi-company projects, each company is responsible for the disclosures of their own transfers of value.

DONATIONS AND GRANTS TO HCOs:

Donations and Grants are funds (grants), benefits in kind or services freely given for the purpose of supporting healthcare, scientific research or education with no consequent obligation on the recipient organisation, institution and the like to provide goods or services to the benefit of Boehringer Ingelheim in return and are provided to HCOs/IMEs as a ToV.

These are formalised in contracts that describe the purpose of the Donation or Grant and related ToV. If a benefit in kind is provided to a HCO (e.g. Boehringer Ingelheim staff time), a monetary value will be attributed to the donation for the purpose of disclosure.

Donations and grants will be disclosed under the “Donations and Grants” section in the disclosure reports.

CONTRIBUTION TO COST OF EVENTS:

Boehringer Ingelheim provides indirect ToV to HCPs, ORDMs and HCOs for education support at medical/educational events or congress for:

- Registration Fees: i.e., the cost of the registration fee for a HCP to attend a medical and educational event or congress.
- Travel and Accommodation includes the cost of flights, trains, parking fees, taxis, hotel accommodation, etc.

Where expenses relate to registration fees, travel, hotel or accommodation costs which are associated without a service fee, the ToV will be disclosed under the “related contribution to costs of events” section in the disclosure report against the named HCP.

SPONSORSHIP:

Boehringer Ingelheim supports HCOs by way of sponsoring events and projects. Where a third-party company is a professional conference or event organiser (PCO) acting on behalf of a HCO, we make every effort to disclose the ToV against the HCO, even when the payment is made to the third party, where this is not possible the ToV is made against the PCO.

FEE FOR SERVICE AND CONSULTANCY:

Boehringer Ingelheim provides ToV for services it receives from HCPs, ORDMs and HCOs under services agreements. Services relate to advice, speaker fees, speaker training, data analysis, development of educational materials and consultancy. These are disclosed under the “Fees” section on the disclosure report.

The cost of travel and hotel accommodation associated with the services received will be disclosed under the “related expenses agreed in the fee for service or consultancy contract” section in the disclosure reports.

Participation in market research where such participation involves remuneration and/or travel. Payments for these services are only disclosed if Boehringer Ingelheim is aware of the identity of those participating in the market research.

PACKAGE DEALS

Package deals which are NOT included in the ordinary course purchase price of a Boehringer product will be disclosed against the relevant HCO.

RESEARCH AND DEVELOPMENT

Boehringer contracts between HCOs and HCPs relating to Research and Development Activities including:

- Non-Clinical Studies (as defined in the OECD Principles of Good Laboratory Practice)
- Clinical Trials (as defined the Medicines for Human Use (Clinical Trials) (Amendment) Regulations 2025 No. 538 and EU Clinical Trials Regulation (EU) No 536/2014 (CTR)
- Non-Interventional Studies that are prospective in nature and that involve the collection of patient data from or on behalf of an individual, or groups of HCPs specifically for the study.

Retrospective non-interventional studies that do not fall within the scope of the definition of Research and Development are disclosed against the HCO as Contracted Services

2 Disclosure’s Scope

2.1 Products concerned

Boehringer Ingelheim Limited produces Prescription Only medicines.

The product classifications included in the disclosure are limited to Prescription Only Medicines (and do not include over-the-counter medicines or medical devices.

2.2 Company concerned

Boehringer Ingelheim Ltd operates in the UK. The disclosures cover recipients located in the UK

2.3 Excluded ToVs

[The following are not transfers of value for the purposes of the Code and have been excluded from disclosure:

- Ordinary course purchases and sales of medicines by and between a company and a health professional or a healthcare organisation
- Pens/pencils and notebooks provided to HCPs and ORDMs at bona fide meetings and items for patient support
- Subsistence provided to health professionals and other relevant decision makers in relation to events and meetings. However, when subsistence is an integral or inseparable part of the ToV (e.g., included in the registration fee, hotel room rate or forms part of the sponsorship costs paid to an HCO) the cost of subsistence has been disclosed.

2.4 ToVs date

[Boehringer Ingelheim discloses all ToVs it makes between 1 January and 31 December of one year by 30th June of the following year. A ToV is made when the transfer is complete (e.g., on the payment date or the transfer of value date). For example, if a contract is signed on 1 October 2024 but the payment is made on 1 January 2025, the Disclosure will be published by the end of June 2026.

In the case of indirect payments (e.g., conferences where accommodation and or travel is provided or registration fees are paid on behalf of HCPs, ORDMs or HCOs), the conference or meeting date is captured as the date of collection of the ToV. Where this is not possible, the date the ToV was paid is used.

Where the ToV is a benefit in kind for example, a therapy review service delivered as a donation, values are reported on the date (s) the recipient received the benefit (on clinic days where the therapy review took place and was delivered).

When Boehringer Ingelheim has contracted with a HCP, ORDM or HCO that spans more than 1 calendar year, only ToV 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.

2.5 Direct ToVs

Direct ToVs are defined as those ToVs, payments or benefits in kind, made directly by Boehringer Ingelheim to the benefitting HCPs/HCOs including (but not limited to) fee for service and consultancy, sponsorships, donations and grants

2.6 Indirect ToVs

Indirect ToVs are those made on behalf of Boehringer Ingelheim for the benefit of a Recipient, or ToVs through an intermediate and where Boehringer Ingelheim knows or can identify the HCP/HCO that will benefit from the ToV including (but not limited to) sponsorships of events and projects delivered by a professional conference or event organiser or a therapy review service delivered through a third-party agency

2.7 Non-monetary ToVs

For non-monetary transfers of value, for example, Donations which are benefits-in-kind that were provided to an HCO, a representative ToV is calculated and allocated.

2.8 ToVs in case of partial attendances or cancellation and refund

If an event is partially attended or cancelled, the ToVs related to the event are disclosed only if Boehringer Ingelheim can attribute any applicable ToV to a recipient.

Where Boehringer Ingelheim has to pay cancellation fees to HCP/HCOs as per service contracts, due to cancellation of initiatives or events, these payments are reported against that HCP/HCO.

2.9 Cross-border activities

[Boehringer Ingelheim operates globally where UK HCPs, ORDMs and HCOs are contracted for interactions with other Boehringer Ingelheim entities. Through our internal processes and systems, we report ToVs made to UK HCPs, ORDMs and HCOs by other Boehringer entities outside of the UK.

Where a ToV is made outside of the recipient's country, the ToV will be reported within the country's disclosure report based on the recipient's principal professional address or place of incorporation. In exceptional circumstances, where a HCP has been temporarily residing in another country, the reporting requirements of the temporary country of residence will apply, and the HCP will be captured in that country's disclosure report.

2.10 R&D

[Boehringer disclose TOV's that relate to research and development on an aggregate basis.

Retrospective non-interventional studies that do not fall within the scope of the definition of Research and Development are disclosable against the HCO as Contracted Services.

2.11 Voluntary disclosure

Boehringer Ingelheim does not make any voluntary disclosures beyond the requirements of the ABPI Code

3 Specific considerations

3.1 Country unique identifier

[Boehringer Ingelheim discloses transfer of value payments to HCPs, ORDMs and HCOs using a unique commercial identifier which allows for the consolidation of customer information into a single profile]

3.2 Self-incorporated HCP

[Boehringer Ingelheim disclose the ToV against the HCP, ORDM or HCO with whom we contract and pay. When a HCP provides services via a Limited Company then that company will be processed as a HCO and the ToV declared against that entity, unless the Limited Company is owned by the HCP as the sole shareholder (as determined by Companies House) in which case the ToV will be declared against the HCP as per the ABPI Code requirements.

Where Boehringer Ingelheim have supported an HCP to attend a meeting or event, the benefit in kind (e.g. value of registration fees, travel or accommodation) will be disclosed against the HCP directly, and not their Limited company.

3.3 Multi-year agreements

[When Boehringer Ingelheim has contracted with a HCP, ORDM or HCO that spans more than 1 calendar year, only ToV 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.

Where the ToV is a benefit in kind, values are reported on the date the recipient received the benefit (which may be different to the year in which the contract was agreed).

3.4 Country specificities

The ABPI Code of Practice describes collaborative working as 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.

Boehringer Ingelheim produces a 'PID' (Project Initiation Document), which is a summary document of the project outline that demonstrates the equitable contributions from all parties involved in the Joint (Collaborative) Working project. Any administrative or set-up costs (paid to third parties in relation to such projects) will be included in this figure. For multi company projects, each company is responsible for the disclosures of their own transfers of value.

All ToV relating to Joint/Collaborative Working are captured in the disclosure report. The executive summaries for these projects can be accessed via the link here [Collaborative Working Boehringer Ingelheim UK](#)

3.5 Quality Checks

Payments made to HCPs, ORDMs and HCOs during the 2025 calendar year were identified from the company's internal data collection systems. Names and addresses were matched with the IQVIA One Key database.

ToV to UK HCPs, ORDMs and HCOs can be provided from any Boehringer Ingelheim entity around the world. Global and local internal processes apply to these interactions to ensure they have a legitimate purpose, and the data is collected consistently.

Before reporting, Boehringer Ingelheim internal processes endeavour to ensure ToV made to UK HCPs, ORDMs and HCOs are collected and reconciled. Data and process monitoring takes place for quality assurance prior to reporting. The monitoring undertaken by Boehringer Ingelheim includes checks to identify (and if necessary, remediation of) potential duplications, anomalies or inaccuracies in the data and to ensure the completeness of the data and compliance with the Industry Code and this methodological note

4 Data protection legal basis

4.1 Consent collection

[Not applicable-see below]

4.2 Legitimate interests

[As a member of the ABPI we believe in promoting transparency and trust in the healthcare industry, therefore Boehringer Ingelheim report ToV's under Legitimate Interest as the legal basis for processing HCP's data. When Boehringer Ingelheim engage with an HCP, the HCP is provided with a

Privacy Notice which explains how Boehringer Ingelheim uses their data. If a situation arises in which the Privacy Notice or appropriate disclosure clause was not included in the contract, or for example if the HCP does not consent to the publication of their data, then Boehringer Ingelheim may decline to engage with the HCP and/or may also perform a balancing test, on the basis of which their data will be reported in the aggregate section of the report.

Boehringer Ingelheim do not report on partial transactions in relation to the respective legal basis for ToV.

As part of Boehringer Ingelheim's pre-disclosure process, HCPs have an opportunity to verify their individual disclosure via the Pre-Disclosure Portal.

In the UK consent is not required for HCOs.

5 Form of disclosure

5.1 Date of publication

31/03/26

5.2 Disclosure platform

www.disclosureuk.org.uk

5.3 Disclosure language

English

6 Disclosure financial data

6.1 Currency

Boehringer Ingelheim reports TOV's in GBP. Where payments are made from non-UK affiliates the conversions have been made from the original currency to GBP using the approved currency exchange rates from Boehringer Ingelheim's financial system.

6.2 VAT included or excluded

Boehringer Ingelheim reports ToV in all categories as net and without VAT

6.3 Calculation rules

Donations in the form of Benefit in Kind (BiK) refers to anything that is deemed to have a value, but actual monies were not received by the recipient. Non-financial transfers of value are disclosed based on the financial valuation of the spend (goods / third party service time spend/employee time spend etc.). When engaging an agency as a third party, any administration fees charged by agencies are not included as these are not ToVs to HCPs or HCOs. Where it is not possible to separate and attribute the 'administration fees' the full value of the ToV will be declared, however this will not constitute a full benefit (in cash or in kind) to the HCP/HCO as the agency would have retained a 'service fee'.

7 Additional Information

[When Boehringer Ingelheim provides ToV to HCPs for medical education through an HCO or Independent Medical Education (IME) 3rd Party, we will endeavour to disclose the ToV against the HCO or IME. However, if Boehringer Ingelheim selects the individual HCPs who benefit from the educational event conducted by the HCO or IME, we will disclose on an individual basis under the name of the HCP or ORDM.]

Boehringer Ingelheim supports universities and teaching institutions where the recipients who benefit are HCPs, ORDMs or HCOs. In these instances, Boehringer Ingelheim will disclose the ToV against the university or teaching institution. In an instance whereby the institution is not considered a HCO and Boehringer Ingelheim are able to identify any HCP as the recipient of an indirect ToV, then Boehringer Ingelheim will disclose this against the individual HCP where appropriate.]