



Version: [18/3/26]

Country: [UK]

[Consilient Health]: Methodological note for HCP/ORDM/HCO disclosure [2025]

Data year: [2025]

Year of publication: [2026]

[Introduction - This methodological note has been prepared using the PMCPA optional template and the 10th of November 2025 guidance on the methodological note for annual disclosure of transfers of value to health professionals (HCPs), other relevant decision makers (ORDMs) and healthcare organisations (HCOs). This note reflects Consilient Health's established disclosure approach and allocates that content to the mandatory 2025 EFPIA/PMCPA heading structure. Where a matter is not evidenced, the relevant section has been described as not applicable, not currently used, or subject to final internal confirmation before submission.

Contents

1	Definitions	2
1.1	Recipients	2
1.2	Kind of ToVs	2
2	Disclosure's Scope	2
2.1	Products concerned	2
2.2	Company concerned	3
2.3	Excluded ToVs	3
2.4	ToVs date	3
2.5	Direct ToVs	3
2.6	Indirect ToVs	3
2.7	Non-monetary ToVs	3
2.8	ToVs in case of partial attendances or cancellation and refund	3
2.9	Cross-border activities	3
2.10	R&D	3
2.11	Voluntary disclosure	3
3	Specific considerations	3
3.1	Country unique identifier	3
3.2	Self-incorporated HCP	4

3.3	Multi-year agreements	4
3.4	Country specificities	4
3.5	Quality Checks	4
4	Data protection legal basis	4
4.1	Consent collection	4
4.2	Legitimate interests	4
5	Form of disclosure	4
5.1	Date of publication	4
5.2	Disclosure platform	4
5.3	Disclosure language.....	4
6	Disclosure financial data	5
6.1	Currency	5
6.2	VAT included or excluded	5
6.3	Calculation rules.....	5
7	Additional Information	5

1 Definitions

1.1 Recipients

[For the 2025 disclosure, Consilient Health have defined recipients as Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs), and Healthcare Organisations (HCOs) in line with the ABPI Code.

Consilient Health have included UK-based HCPs engaged for consultancy services, speaking engagements and advisory activities, as well as UK healthcare organisations receiving grants or sponsorship.

Where applicable, Consilient Health have treated retired healthcare professionals consistently with active HCPs where services were provided.

No disclosures relating to deceased individuals were required for 2025 and our methodology is to follow the advice from the PMCPA in the Q&A section - How should companies publish data about deceased health professionals?

1.2 Kind of ToVs

[For 2025, Consilient Health have categorised Transfers of Value (ToVs) as:

- Consultancy and speaker fees
- Related travel and expenses
- Donations and grants
- Sponsorship of meetings

These reflect the activities undertaken in 2025.

2 Disclosure's Scope

2.1 Products concerned

[Consilient Health have included transfers related to prescription medicines only. No OTC or device-related ToVs were included]

2.2 Company concerned

[This disclosure covers Consilient Health activities only. No affiliates or subsidiaries are reported separately]

2.3 Excluded ToVs

[Consilient Health have excluded transfers outside ABPI scope, including items not required to be disclosed under Clause 1.25.]

2.4 ToVs date

[The disclosure covers the calendar year 2025]

2.5 Direct ToVs

[Direct ToVs include contracted service fees, speaker fees, direct reimbursement of agreed travel expenses, grants to UK healthcare organisations and direct sponsorship payments to healthcare organisations for meetings or meeting-related activity]

2.6 Indirect ToVs

[Indirect ToVs included sponsorship and grants via third-party organisations are disclosed.]

2.7 Non-monetary ToVs

[No non-monetary ToVs were provided in 2025.]

2.8 ToVs in case of partial attendances or cancellation and refund

[Consilient Health would disclose only costs actually incurred where cancellations or partial attendance occurred, in 2025 there were none]

2.9 Cross-border activities

[No material cross-border ToVs were applicable to UK disclosures in 2025]

2.10 R&D

[No R&D ToVs were required to be disclosed for 2025.]

2.11 Voluntary disclosure

[Consilient Health have not included voluntary disclosures beyond ABPI requirements]

3 Specific considerations

3.1 Country unique identifier

[Consilient Health have used internal identifiers to ensure accurate attribution of payments. No professional identifiers were submitted in line with UK requirements.]

3.2 Self-incorporated HCP

[Where HCPs operated via limited companies, Consilient Health have disclosed payments appropriately to the contracting entity in the HCP section of the mandatory template and provide the Ltd company address]

3.3 Multi-year agreements

[Consilient Health have not entered into multi-year agreements.]

3.4 Country specificities

[Consilient Health We do not work with other pharmaceutical companies and therefore there is no need to divide disclosures.]

3.5 Quality Checks

[Consilient Health maintain internal spreadsheets and cross-checked all payments against finance records prior to submission.]

As per previous methodological statements, the same quality control principles are applied: reconciliation of source spreadsheets to finance payment records; checking that each payment has been allocated to the correct recipient and disclosure category; review of duplicates; confirmation of payment date, VAT treatment and currency; and final review before submission to Disclosure UK]

4 Data protection legal basis

4.1 Consent collection

[Consilient Health have relied on consent as the lawful basis for individual disclosure. Where consent was not provided, ToVs were disclosed in aggregate]

4.2 Legitimate interests

[Not applicable]

5 Form of disclosure

5.1 Date of publication

[30/06/2026]

5.2 Disclosure platform

[Disclosure UK - www.disclosureuk.org.uk]

5.3 Disclosure language

[English]

6 Disclosure financial data

6.1 Currency

[All ToVs were paid and disclosed in GBP. Where required, exchange rates at time of payment were used]

6.2 VAT included or excluded

[Payments were made exclusive of VAT; VAT was applied where valid invoices were received.

6.3 Calculation rules

[All ToVs are based on actual payments made, including reimbursed expenses]

7 Additional Information

[All 2025 activities including advisory boards, consultancy and grants have been fully disclosed]