



Flynn Pharma Ltd

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Flynn Pharma Ltd. Methodological note for HCP/ORDM/HCO disclosure 2025

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1 Definitions

1.1 Recipients

- Healthcare Professionals, Other Relevant Decision Makers, Healthcare Organisations. The term ‘healthcare professional’ (HCP) includes members of the medical, nursing and pharmacy professions and any other persons who in the course of their professional activities may administer, prescribe, purchase, recommend or supply a medicine. Disclosure will also apply to ‘other relevant decision makers’ (ORDMs), this 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 themselves HCPs. The term ‘healthcare organisation’ (HCO) means either a healthcare, medical or scientific association or organisation such as a hospital, clinic, foundation trust, or other teaching institution or learned society through which one or more health professionals or ORDMs provide services.
- Should an HCP be either retired or deceased, ToV will be reported against the HCP. However, whilst it may be lawful to publish this information, Flynn remains sensitive to direct contact with either the deceased next-of-kin or retired HCP, balancing the need for transparency with the nature of the request.

1.2 Kind of ToVs

All ToV will be allocated to one of the categories outlined below:

- Registration Fees; Registration fees paid by Flynn to or on behalf of an HCP associated with their attendance at national or international educational meetings, congresses or courses.
- Travel & Accommodation; Costs associated with travel, subsistence and accommodation agreed as part of sponsorship paid by Flynn to or on behalf of an HCP associated with their attendance at national and international educational meetings, congresses or courses.
- Fees; Including speaker honoraria, consultancy fees, fees for market research or advisory activities carried out by HCPs or HCOs for or on behalf of Flynn.
- Related Expenses; Travel costs and subsistence incurred by a HCP while carrying out engagements on behalf of Flynn or agreed as part of their sponsorship.

- Donations, grants and benefits in kind; In general, donations are physical items, services or benefits-in-kind which may be offered or requested. Grants are the provision of funds.
- Contribution to the cost of an event; This may include sponsorship or support for the running of an event by an organisation independent to Flynn.

2 Disclosure's Scope

2.1 Products concerned

The disclosure made by Flynn Pharma Ltd. relates only to prescription only medicines and interactions with HCPs/HCOs is focused on the promotion of prescription medicines within the United Kingdom of Great Britain & Northern Ireland.

2.2 Company concerned

Flynn Pharma is a privately held pharmaceutical company, that supplies both branded and generic medicines.

2.3 Excluded ToVs

The following ToVs are excluded:

- Costs within the limits of Clause 10 of the ABPI for Flynn organised and sponsored meetings, including costs of meals and drinks, logistical costs (for example room hire) are excluded. However, speaker honoraria, support for travel and accommodation are included in the relevant cost category.
- Transfers of value that are solely related to OTC medicines.
- Ordinary course purchases and sales of medicines by and between a company and a health professional or a healthcare organisation.
- Samples of medicines.
- Transfers of value provided in accordance with Clauses 10.5, 10.6 and 19.2 of the ABPI Code.
- Subsistence provided to health professionals and other relevant decision makers in accordance with Clause 10.1.

2.4 ToVs date

The Flynn Pharma Ltd disclosure includes all applicable ToV during the period between 1st January 2025 and 31st December 2025.

2.5 Direct ToVs

Registration Fees; Costs associated with travel, subsistence and accommodation associated with attendance at national and international educational meetings, congresses or courses; Contribution to the cost of an event; Fees; including speaker honoraria, consultancy fees, fees for market research or advisory activities; Travel costs and accommodation agreed as part of sponsorship; Donations, grants and benefits in kind to HCOs.

2.6 Indirect ToVs

Where a ToV is made to an HCP or ORDM indirectly via a healthcare organisation, such a transfer is disclosed once only. Where third parties are appointed to manage an event, and where an HCO ultimately benefits from that ToV, these ToVs are disclosed against the HCO.

2.7 Non-monetary ToVs

Donations and sponsorship for HCOs may be both monetary and/or donations in kind. These are certified in mandatory agreements outlining the nature of the support. If the support is non-financial and/or indirect (donation) and cannot be assigned a meaningful monetary value, the published information will describe the non-monetary value that the organisation receives.

2.8 ToVs in case of partial attendances or cancellation and refund

If an event is cancelled, the ToVs related to the event are disclosed only if Flynn Pharma can attribute the ToV to a recipient. Where Flynn Pharma 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

Where payments are made to groups or individuals outside the UK, Flynn will work with relevant overseas partners to ensure appropriate disclosure in the country of origin of the individual.

2.10 R&D

Flynn Pharma does not conduct R&D activities.

2.11 Voluntary disclosure

Flynn complies with disclosures required by the ABPI Code.

3 Specific considerations

3.1 Country unique identifier

Flynn only discloses ToV against HCPs and HCOs within the United Kingdom. It utilises HCP/HCO unique identifiers to ensure that the identity of the HCP/HCO benefitting from the ToVs is clearly distinguishable.

3.2 Self-incorporated HCP

Where an HCP has set up their own company and they are the sole owner and Flynn Pharma has made payments to that company for Services provided by the HCP, the ToVs have been disclosed against that individual HCP.

3.3 Multi-year agreements

Where ToVs relate to multi-year contracts, only the ToVs made in the reporting year are included.

3.4 Country specificities

Flynn has not engaged in collaborative working with other pharmaceutical companies.

3.5 Quality Checks

Payments, or payments in-kind, made by Flynn to HCPs, ORDMs and HCOs, are collated on a secure internal company database. Paperwork associated with all activities is recorded,

checked and stored. Pre-disclosure data checks are undertaken in line with the Annual Disclosure of Transfer of Value SOP-0070.

4 Data protection legal basis

4.1 Consent collection

Flynn Pharma has made every effort to achieve a high level of individual HCP payment disclosure whilst recognising applicable Data Privacy regulations and in accordance with applicable UK data protection legislation. Where HCPs exercise their right under the Data Protection Act or under the General Data Protection Regulation (GDPR) to object to individual disclosure, Flynn will attempt to encourage the HCPs to remain in individual disclosure. If an individual still chooses to opt out of public disclosures, such ToVs will be reported in aggregate. In such circumstances the individual HCP cannot be identified and only the number of recipients and their share (%) is disclosed for each reporting category

4.2 Legitimate interests

Flynn do not rely on legitimate interests.

5 Form of disclosure

5.1 Date of publication

June 2026

5.2 Disclosure platform

The Disclosure platform and all previous submissions completed by Flynn Pharma can be found [here](#).

5.3 Disclosure language

Disclosure is made in English

6 Disclosure financial data

6.1 Currency

Disclosures are made in GBP (£). For ToVs made in foreign currencies, the conversion is made at the time of reporting using standard currency accounting rates.

6.2 VAT included or excluded

Disclosures include VAT where applicable.

6.3 Calculation rules

In regard to transfers of value to patient organisations, Flynn will publish the names of any such organisations, the monetary value of any such support and total paid in the calendar year.

7 Additional Information

In regard to transfers of value (payments) to members the public including patients and journalists Flynn will disclose the number (of members of the public) and aggregate value. In both cases (patient organisations and members of the public), any fees and expenses will be disclosed separately.]