

Fresenius Medical Care UK Limited (FMEUK): Methodological note for HCP/ORDM/HCO disclosure 2025

Data year: 2025

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1 Definitions

1.1 Recipients

Healthcare Professional (HCP)

The term 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.

Other relevant decision maker (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 is not a health professional

Healthcare organisation (HCO)

This means 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 health professionals or other relevant decision makers provide services.

1.2 Kind of ToVs

Sponsorship

FMEUK provides financial support to recognised organisations to support medical or scientific education. This can include helping to organise or host education or scientific events, such as independent conferences.

The aim of this support is to increase the educational or scientific quality or to help with help with basic arrangements, such as modest venues or light hospitality, in line with FMEUK's ethical standards. A formal Sponsorship Agreement is always required, clearly explaining why the support is given and how the funds will be used.

Sponsorships may also include funding for additional activities for example like satellite sessions or covering costs for speakers etc. In these cases, FMEUK reports the total amount given to the organisation, rather than payments made to individual speakers.

Payments (called transfers of value (ToVs)) are made either directly to the HCO or to an event organiser acting on their behalf. All payments are reported under the organisation that ultimately benefits.

Collaborative Working with Organisations (including Joint working)

Collaborative working which either enhances patient care or is for the benefit of patients or alternatively benefits the NHS and, as a minimum, maintains patient care is acceptable providing it is carried out in a manner compatible with the Code.

Collaborative working is generally between one or more pharmaceutical companies, healthcare organisations and other organisations. Joint working is a limited form of collaborative working.

All payments or support (ToVs) relating to collaborative including joint working in the UK are included in this report. In most cases, any financial or non-financial support provided by FMEUK is reported in the year the project finishes. If an FMEUK employee contributes time or expertise to a project, this is also counted as non-financial contribution and included in the total reported support.

Short summaries of these collaborative projects are available on the FMEUK website: www.freseniusmedicalcare.com/en-gb/

Donations and Grants

FMEUK provides supports for advances in healthcare systems, health and medical or scientific education, through monetary or non-monetary to trusted, established organisations, such as patient organisation or charities, which are subject to separate disclosure and thus excluded.

Donations and grants are funds, 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 the pharmaceutical company in return. Donations and grants to individuals are prohibited.

Travel, Accommodation, Fees for Services/Consultancy and associated expenses

FMEUK may engage with healthcare professionals or organisation for services when there is a genuine business need and they are suitably qualified. Payments are made at fair market value.

As part of the engagement FMEUK may help cover travel and accommodation costs. This support may be provided directly to HCPs for attending selected FMEUK & Corporate organised meetings.

This can also include costs such as flights, train, taxis and other relevant expenses. The costs are reported for specific individuals.

- The services may include:
- Speaking at or chair meetings
- Taking part in advisory boards
- Contract work (not permanent roles)
- Training services

As part of these agreements, FMEUK may also cover related expenses such as visas, parking. These costs are either paid directly by FMEUK or reimbursed with receipts.

If the payments are made to an organisation (HCO), they are reported under the organisation's name.

2 Disclosure's Scope

2.1 Products concerned

FMEUK predominantly operates as a medical device company, with a limited portfolio of Prescription Only Medicine (POM). Therefore, ToVs relating to POMs only are being disclosed, and other ToVs relating to medical devices have been excluded.

2.2 Company concerned

Fresenius Medical Care UK Limited

Nunn Brook Road, Huthwaite, Sutton in Ashfield, Nottinghamshire, NH17 2HU

2.3 Excluded ToVs

The following ToVs are excluded from disclosure:

- Hospitality and logistical costs relating to company organised meetings, for example room hire, audiovisuals, personnel, food and drinks. FMEUK applies strict limits for such meetings in alignment with the ABPI code. However, ToVs such as support for travel, accommodation and or speaker fees (including preparation time, travel time, travel expenses) are disclosed appropriately.
- All ToVs to Patient Organisations and non-HCO organisations, as separate reporting requirements apply to these
- Informational and educational materials for HCPs and patients are excluded from this report

2.4 ToVs date

A ToV is reported once the payment has been made. It is reported in the year it is paid between 1st Jan and 31st Dec.

For agreements that last more than one year, only the payments made during the reporting year are included.

2.5 Direct ToVs

Direct ToVs include payments provided by FMEUK without involvement of a third party. By using a centralised system, FMEUK maintains transparency improve data accuracy, and ensure that all reportable ToVs are properly tracked and disclosed in the relevant period.

Direct ToVs are recorded in FMEUK's compliance system at the time they are provided to HCPs or HCOs. This system captures relevant details, including the nature and value of the support, to ensure accurate and consistent reporting. The information recorded is then used to support annual disclosure activities in line with ABPI requirements.

2.6 Indirect ToVs

Indirect ToVs arise when support is provided through a third party rather than directly. Where a HCO appoints a third party to organise an event, the ToV is reported against the HCO, as the ultimate beneficiary.

Where FMEUK uses third parties to arrange travel and or accommodation for HCPs providing service, these ToVs are reported against the individual HCP. However, administration fees charged by agencies are excluded, as they are not considered ToV.

2.7 Non-monetary ToVs

Not applicable

2.8 ToVs in case of partial attendances or cancellation and refund

Where an HCP or HCO does not attend an event or the event is cancelled, any associated costs for example, cancellation charges are not disclosed. In cases of partial attendance, only the benefits received are included.

2.9 Cross-border activities

FME is a multi-national company that operates a robust compliance system. To ensure transparency, employees are required to record and report all ToVs provided to HCPs/ORDMs and HCOs, to the relevant compliance team in the respective countries. This system support tracking and reporting of all support provided. ToVs are disclosed in line with the transparency requirements of the country where the HCP/ORDMs mainly practices or where the HCO is registered. This approach ensures that all support is reported correctly, and in accordance with country specific regulations.

2.10 R&D

Not applicable

2.11 Voluntary disclosure

FMEUK is committed to transparency and discloses ToVs to HCPs/ORDMs and HCOs based on legitimate interest. FMEUK applies this approach in line with data protection requirements and ensure that appropriate safeguards are in place. This supports compliance with ABPI requirements while balancing transparency with privacy and helps to provide clear information about the company's interaction with HCPs and organisations.

3 Specific considerations

3.1 Country unique identifier

As part of FME's onboarding process, each HCP/ORDM and HCO is assigned a unique identification code. This code is used to accurately record and track all ToVs across the company.

3.2 Self-incorporated HCP

Where an HCP/ORDM operate through their own company as the sole owner, in such circumstances FMEUK makes payments to that company for services provided by HCP/ORDM, the ToV are reported under the name of the individual HCP/ORDM.

3.3 Multi-year agreements

Where a contract relating to a ToV extends over more than one year, the relevant ToV is disclosed in the reporting year in which the ToV is provided.

3.4 Country specificities

All disclosures in this report are prepared in line with the ABPI Code of Practice. The methodologies described in this document fully reflect UK-specific expectations.

3.5 Quality Checks

A range of checks are applied to ensure the accuracy and completeness of disclosed data. ToVs are validated within internal systems and reconciled against financial records where applicable. Checks are performed to identify duplicate entries and ensure correct recipient details using unique code. Consistency checks are applied to ensure alignment with the defined methodology. Where discrepancies are identified, appropriate corrections are made to ensure accurate and reliable disclosure.

4 Data protection legal basis

4.1 Consent collection

Not applicable

4.2 Legitimate interests

Legitimate interest is relied upon as a lawful basis for the disclosures of certain ToVs. FMEUK considers transparency in its interaction with HCPs and organisations to be a fundamental obligation under the ABPI Code of Practice and a key component of maintaining trust with stakeholders. A balancing test is performed to ensure that this interest is not overridden by the rights and freedoms of the individuals. Appropriate safeguards, including data minimisation is implemented to protect personal data at all times.

5 Form of disclosure

5.1 Date of publication

31/03/2026

5.2 Disclosure platform

www.disclosureuk.org.uk

5.3 Disclosure language

English

6 Disclosure financial data

6.1 Currency

ToVs will be reported in British Pounds (GBP). Where ToVs are made in foreign currencies, amounts are converted at the time of engagement standard exchange rates.

6.2 VAT included or excluded

The transfer of values provided on the disclosure template is in all instances the gross amount, which may or may not include Value Added Tax (VAT)

6.3 Calculation rules

ToVs are calculated based on the full monetary amount in gross provided to the recipient, which may or may not include VAT, and are recorded at the point of payment or when the service is delivered, depending on the nature of the activity. Where payments related to multi-year contracts or ongoing services, amounts are allocated proportionally to the relevant reporting period. All calculations are performed using consistent internal methodologies to ensure accuracy, completeness, and alignment with the requirements of the ABPI Code of Practice.

7 Additional Information

Not applicable