

Galen Limited: Methodological note for HCP/ORDM/HCO disclosure 2026

Data year: 2025

Year of publication: 2026

Galen Limited is a privately-owned global pharmaceutical company headquartered in Craigavon, Northern Ireland. Specialising in both branded generics and speciality products.

As a UK-based company and a member of The Association of the British Pharmaceutical Industry (ABPI), Galen is fully committed to adhering to the ABPI Code of Practice for the Pharmaceutical Industry and the European Federation of Pharmaceutical Industries and Associations (EFPIA) HCP/HCO Disclosure Code. These codes require pharmaceutical companies to publicly disclose transfers of value made directly or indirectly to healthcare professionals (HCPs) and healthcare organisations (HCOs) located in Europe. Disclosures made by Galen will remain publicly available for a minimum of three years in accordance with the ABPI Code of Practice.

With regards to Galen's disclosure of payments for 2025, details of the methodology used are listed below.

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Definitions

Recipients

For the purpose of this disclosure, Recipients are defined in line with the ABPI Code of Practice and EFPIA Disclosure Code and include:

- **Healthcare Professionals (HCPs):** Any member of the medical, dental, pharmacy, nursing or allied healthcare professions, or any other person who, in the course of their professional activities, may administer, prescribe, purchase, recommend or supply a medicine.
- **Other Relevant Decision Makers (ORDMs):** Individuals who, in the course of their professional activities, may influence the prescribing, purchasing or supply of medicines.
- **Healthcare Organisations (HCOs):** Organisations or associations that are comprised of healthcare professionals and/or that provide healthcare services or conduct healthcare-related research.

Certain organisations, including **NSPKU (UK) Ltd** and **ESPKU**, have been classified as **HCOs** for the purposes of disclosure, as they operate in close collaboration with both healthcare professionals and patients and engage in educational and professional activities, that provide healthcare or conduct research involving HCPs.

Kind of ToVs

Transfers of Value disclosed by Galen for 2025 include payments made directly or indirectly to HCPs, ORDMs and HCOs, falling under the following categories:

- **Contributions to the costs of Events**, including registration fees, travel and accommodation
- **Contracted Services**, including speaker fees, consultancy services and related expenses
- **Sponsorship agreements** with HCOs or third-party organisations appointed by HCOs to manage events
- **Donations and grants** where applicable and compliant with the ABPI Code

The recruitment of HCPs/HCOs for the above services are not an inducement to prescribe, supply, administer, recommend, buy or sell any medicine. This is stated clearly within each contract signed.

Disclosure's Scope

Products concerned

Galen's disclosure includes any payment made in connection with any of the products it commercialises in the UK or Ireland regardless of legal classification.

Company concerned

This disclosure covers Transfers of Value made by Galen Limited, a privately owned pharmaceutical company headquartered in Craigavon, Northern Ireland.

Excluded ToVs

The following Transfers of Value are excluded from this disclosure in accordance with the ABPI Code:

- Subsistence provided to health professionals and other relevant decision makers in accordance with clause 10.1
- Transfer of value provided in accordance with clauses 10.5, 10.6 and 19.2
- Samples of medicines provided in accordance with clause 21

ToVs date

Transfers of Value are disclosed based on the date of payment, rather than the date of the activity or agreement. Our submission includes all activity from 1st January 2025 – 31st December 2025.

Direct ToVs

Direct Transfers of Value include payments made directly by Galen to HCPs, ORDMs or HCOs, such as consultancy fees, speaker honoraria, sponsorship payments and registration fees.

Indirect ToVs

Indirect Transfers of Value include payments made by Galen via third-party organisations (e.g. media agencies or conference organisers) acting on behalf of an HCO. These have been disclosed against the relevant HCO in line with ABPI guidance.

Non-monetary ToVs

Non-monetary Transfers of Value (e.g. meeting materials or logistical support) are disclosed where required and valued at the cost to Galen.

ToVs in case of partial attendances or cancellation and refund

Where an HCP or HCO partially attended an event, or where an event was cancelled, only the actual costs incurred by Galen have been disclosed. Any refunded amounts have been excluded.

Cross-border activities

Galen has included Transfers of Value relating to activities spanning both the UK and Ireland, where there is operational or educational overlap.

As a UK-based company, Galen Limited publicly discloses ToVs made to any HCP/HCO located anywhere within Europe as per Clause 28.1 of the ABPI Code - [Clause 28 Annual Disclosure of Transfers of Value to Health Professionals, Other Relevant Decision Makers and Healthcare Organisations](#)

As our UK entity is involved in all activities across UK & ROI, the ToVs made by Galen Limited to HCPs/HCOs in the Republic of Ireland have been included in Galen's UK disclosure.

All such costs have been disclosed in GBP, converted at the exchange rate applicable at the time of payment.

R&D

For 2025, no Transfers of Value relating to Research and Development, as defined under Clause 1.20 of the ABPI Code, were made by Galen. If applicable, R&D Transfers of value would be disclosed in aggregate in-line with ABPI requirements.

Voluntary disclosure

Galen has not made any voluntary disclosures beyond those required under the ABPI Code for 2025.

Specific considerations

Country unique identifier

Where available, unique country identifiers have been included. Where an HCO is based outside the UK and does not have a UK postcode, a placeholder postcode (XX0 0XX) has been used in line with disclosure requirements.

Self-incorporated HCP

Where services were provided by self-incorporated HCPs, Transfers of Value have been disclosed under **Contracted Services** and attributed to the relevant individual or organisation, in line with ABPI guidance.

Multi-year agreements

For agreements spanning more than one calendar year, only the **portion of the Transfer of Value paid during 2025** has been disclosed.

Country specificities

All Transfers of Value have been disclosed in accordance with **UK ABPI requirements**, including activities involving Ireland where applicable, using consistent currency conversion and classification principles.

Quality Checks

Multiple quality control checks were undertaken, including:

- Review of recipient classification (HCP, ORDM or HCO)
- Validation of payment category alignment
- Reconciliation of disclosed values against financial records

Data protection legal basis

Consent collection

Not applicable

Legitimate interests

For Galen's 2025 disclosure, we are relying on legitimate interest as the appropriate lawful basis for our disclosure, complying with legal and regulatory transparency obligations. Where an individual healthcare professional objects to disclosure on data protection grounds, Transfers of Value are disclosed in aggregate, in-line with ABPI guidance.

Form of disclosure

Date of publication

The disclosure is published in March 2026, covering the data year 2025.

Disclosure platform

Galen's disclosure is published via the ABPI central disclosure portal alongside previous years submissions.

Disclosure language

The disclosure and methodological note are published in English.

Disclosure financial data

Currency

All Transfers of Value are disclosed in GBP (£). Where payments were made in other currencies, conversion to GBP was applied using the exchange rate at the time of payment.

VAT included or excluded

VAT is excluded from disclosed amounts where applicable. Honoraria and professional fees are disclosed as the full fee paid.

Calculation rules

Transfers of Value represent the actual amount paid by Galen during the reporting period, net of refunds, and aligned to the appropriate ABPI disclosure category.

Additional Information

Speaker agreements have been categorised under Contracted Services.

Training courses have been classified as Events.

Sponsorships of hospital blogs and podcasts have been disclosed against the relevant organisational body (HCO).