

# GEDEON RICHTER (UK) Ltd

## Methodological note for HCP/ORDM/HCO disclosure 2025

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# 1 Definitions

## 1.1 Recipients

Recipients comprise health professionals (HCPs), other relevant decision makers (ORDMs) and healthcare organisations (HCOs) as defined in the ABPI Code. Disclosures relate to recipients whose principal professional address or registered address is in the United Kingdom. A recipient who retires after receiving a transfer of value during the reporting period is treated according to their status at the time of the activity. Information relating to a deceased HCP or ORDM is handled sensitively and on a case-by-case basis, taking account of transparency requirements and any contact from the recipient’s next of kin or employer.

## 1.2 Kind of ToVs

The transfers of value included are: collaborative working, including joint working; donations and grants to HCOs and other eligible organisations; sponsorship and contributions to the costs of events or meetings; registration fees, travel and accommodation provided to support HCP or ORDM attendance at events or meetings; fees and related expenses for contracted services provided by HCPs, ORDMs or HCOs; and, where applicable, research and development transfers of value. Transfers may be monetary or non-monetary and may be made directly or indirectly through a third party.

# 2 Disclosure’s Scope

## 2.1 Products concerned

Prescription Only Medicine

## 2.2 Company concerned

ToV data submitted contains all UK HCPs and HCOs received support by Gedeon Richter (UK) Ltd and the Gedeon Richter Group.

## 2.3 Excluded ToVs

Subsistence provided to health professionals and other relevant

decision makers in accordance with Clause 10.1.

## 2.4 ToVs date

1 January-31 December 2025

## 2.5 Direct ToVs

Collaborative working, including joint working, in accordance with Clause 20

- Donations and grants provided to healthcare organisations, institutions and other organisations in accordance with Clause 23
- Fees and expenses paid for contracted services between companies and institutions, organisations or associations of health professionals, in accordance with Clause 24.6
- Support of attendance by health professionals and other relevant decision makers at events/meetings paid directly in accordance with Clause 10.11
- Fees and expenses paid for contracted services to health professionals and other relevant decision makers, or to their employers on their behalf, in relation to Clause 24.6
- Sponsorship, including contributions to costs related to events/meetings paid to healthcare organisations or to organisations managing events on their behalf, which may include support of health professionals not known to the company via the healthcare organisation by way of registration fees, accommodation and travel, in accordance with Clause 10.12.

## **2.6 Indirect ToVs**

- Fees and expenses paid for contracted services to health professionals and other relevant decision makers, or to their employers on their behalf, in relation to Clause 24.6
- Sponsorship, including contributions to costs related to events/meetings paid to healthcare organisations or to organisations managing events on their behalf, which may include support of health professionals not known to the company via the healthcare organisation by way of registration fees, accommodation and travel, in accordance with Clause 10.12

## **2.7 Non-monetary ToVs**

Non-monetary transfers of value may arise through collaborative working projects, including the provision of Gedeon Richter (UK) Ltd staff time, expertise, materials, services or other in-kind resources. Where applicable, such contributions are valued using the actual cost to the company or, where an actual cost is not available, a reasonable and documented fair-market-value methodology. Only contributions that constitute a transfer of value to an HCO or other relevant recipient are included.

## **2.8 ToVs in case of partial attendances or cancellation and refund**

All paid ToV related support is disclosed regardless of cancellation apart from where refund was received by Gedeon Richter (UK) Ltd and Gedeon Richter Group.

## **2.9 Cross-border activities**

The process managed by the global Medical Team via Sharepoint where the Gedeon Richter Group's affiliates and subsidiaries need to submit ToV related information, when support provided to UK HCPs and HCOs outside of the UK.

The UK Marketing and Medical Teams are also part of the process safeguarding the ABPI compliance throughout these arrangements.

## **2.10 R&D**

N/A

## **2.11 Voluntary disclosure**

N/A

# **3 Specific considerations**

## **3.1 Country unique identifier**

No unique identifier is used in our processes, only HCPs' and HCOs' primary address to identify the recipients.

## **3.2 Self-incorporated HCP**

ToV related support provided to HCPs and paid to their incorporated companies are disclosed to the HCPs name, where consent is given.

## **3.3 Multi-year agreements**

The company does not operate multi-year contracts.

## **3.4 Country specificities**

Links to the executive summaries for collaborative working projects are provided in the relevant fields of the Disclosure UK submission and direct users to the transparency section of the Gedeon Richter (UK) Ltd website. Links are checked before submission to confirm that they are accurate and active.

## **3.5 Quality Checks**

Most transactions are extracted from the company's accounting package. Only a fraction are transactions paid by another member of the Gedeon Richter group.

The terms "Sponsorship", "Grant" and "Donation" and principles of application are clearly defined in the relevant company policies and SOPs. Rules and principles of sponsorship are also detailed in the HCP document templates.

Gedeon Richter (UK) Ltd has included an appropriate section to this effect in all its agreements with HCPs before there is ToV involved. The section includes two boxes where the HCP indicates his/her approval to disclose or not disclose the Transfer of Value. Sponsorships and donations to HCOs are disclosed automatically.

Gedeon Richter (UK) Ltd's Finance Team has created a flag "disclose/do not disclose" that is stored against the Supplier record in its accounting system.

Also in the supplier record is stored the "HCO" and "HCP" category that enable the Finance Team to pick only suppliers that belong to one or the other category.

When a transaction is posted in the accounting package, the Finance Team determines whether the transaction falls into any of the categories defined within the ABPI template (registration fees, consultancy fees, travel and expenses, etc). Appropriate identifiers have been created in the accounting software to that effect.

Cells are populated automatically by formula using XRL (add-on to Excel) which opens a link to our accounting package and takes the information based on relevant criteria.

## 4 Data protection legal basis

### 4.1 Consent collection

All efforts have been made to achieve a high level of individual HCP payment disclosure whilst recognising the UK Data Act and the General Data Protection Regulation (GDPR). For 2025 disclosure, Gedeon Richter (UK) Limited requested consent, as part of the agreement with HCPs with the right to withdraw consent, for disclosing individual transfers of value. Where consent has not been given, and documented then data will be included in the aggregated reporting..

### 4.2 Legitimate interests

Gedeon Richter (UK) Ltd does not rely on legitimate interests as the lawful basis for the individual disclosure of transfers of value to HCPs or ORDMs. Where valid consent for individual disclosure has not been obtained, or has been withdrawn before publication, the relevant transfers of value are reported in aggregate..

## 5 Form of disclosure

### 5.1 Date of publication

30/06/2025

### 5.2 Disclosure platform

Disclosure UK [www.disclosureuk.org.uk](http://www.disclosureuk.org.uk)

### 5.3 Disclosure language

English

## 6 Disclosure financial data

### 6.1 Currency

GBP

Transactions in foreign currency were converted to local UK currency at time of entry in the accounting package.

Where ToV related support was provided by the global Head Office and the other Gedeon Richter affiliates the Bank of England exchange rate was used at the time of transaction.

### 6.2 VAT included or excluded

Information disclosed in the disclosure template includes all ToV transactions excluding VAT paid to HCPs, ORDMS and HCOs during the period.

### 6.3 Calculation rules

Transfers of value are reported using the amount actually paid or the actual cost incurred by Gedeon Richter (UK) Ltd. Monetary transfers are allocated to the relevant disclosure category based on the nature of the activity. Non-monetary or in-kind transfers, where applicable, are valued using the actual cost to the company or, where this is not directly available, a reasonable and documented fair-market-value estimate. Shared costs are apportioned to reflect Gedeon Richter (UK) Ltd's contribution only. No rounding is applied

other than that required by the Disclosure UK submission format, and cancelled activities are excluded where the company has received a full refund.

## **7 Additional Information**

N/A