

Merck Sharp & Dohme (UK) Limited: Methodological note for HCP/ORDM/HCO disclosure 2025

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In 2014, by introducing the disclosure requirements, EFPIA and its members ABPI demonstrated their commitment to self-regulation but also the legitimacy of the interactions with HCPs, and HCOs.

Member Companies and companies that are members of Member Associations are required to disclose transfers of value made to HCPs and HCOs. This disclosure includes the total amount of value transferred, by type of activity, by HCP or HCO.

The disclosure is aligned with the laws and regulations of the United Kingdom. The methodological note is required for disclosure based on the EFPIA Code requirements as transposed in national code provisions.

This methodological note defines the relevant types of transfers of value disclosed, which transfers of value are excluded, and other relevant information to assist the reader to understand how MSD collected, organised and reported the disclosed data.

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1 Definitions

1.1 Recipients

Any HCO or HCP whose primary practice, main professional address or place of incorporation is in the United Kingdom. The type of recipients include:

Healthcare Professionals (HCPs): Includes members of the medical, dental, pharmacy and nursing professions, retired or deceased and any other persons, who during their professional activities may administer, prescribe, purchase, recommend or supply a medicine. It also includes ‘other relevant decision makers, particularly 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 health professionals. It also includes any employee of MSD whose primary occupation is that of a practicing health professional.

Healthcare Organisations (HCOs): 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.

Clinical Research Organisation (CRO): An organisation that provides services to the pharmaceutical, biotechnology, and medical device industries in the form of research support outsourced on a contract basis. A CRO is not a HCO.

Event: Scientific meetings, promotional meetings, or professional meetings, congresses, conferences, symposia, and other similar events (including advisory board meetings, visits to research or manufacturing facilities, and planning, training or investigator meetings for clinical trials and non-interventional studies), organised or sponsored by or on behalf of MSD.

1.2 Kind of ToVs

A direct or indirect transfer of value, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development or sale of medicines.

A Direct TOV: Made directly by MSD for the benefit of a Recipient.

An Indirect TOV: Made on behalf of MSD for the benefit of a recipient or through an intermediate and where the company knows or can identify the recipient that will benefit from the transfer of value.

Below are the category types of TOV, along with their definitions

Donations and Grants: Providing funds, goods, services or benefits-in-kind to support healthcare, research and education. These can be provided to healthcare organisations or patient organisations

Sponsorships: are defined as funding in support of an event, meeting, programme, or activity that is related to medical education, scientific or other related information-sharing, and will be used for the activity's organisation, hospitality or venue cost.

Contributions to Costs of Events: Covers expenses associated with attendance at events/meetings whether paid directly, indirectly or via another party. Includes costs relating to registration fees, accommodation and travel, both inside and outside the UK.

Fees for Services and Consultancy: Paid to a HCP or to their employer on their behalf are TOV made for professional services, such as speaker fees, speaker training, medical writing, data analysis, development of educational materials, general consulting and advising via advisory boards/expert input fora, fees for participating in market research when the identity of the HCP is known to MSD, and investigator- initiated studies that do not meet the definition of Research & Development TOV. To the extent incidental expenses incurred under a service or consultancy agreement are reimbursed (e.g., travel and accommodation); such TOV is disclosed as related expenses and not as a fee for service or consultancy.

Research and Development (R&D): Paid to an HCO or HCP related to the planning or conduct of:

- i) Non-clinical studies (as defined in OECD Principles on Good Laboratory Practice)
- ii) Clinical trials (as defined in Directive 2001/20/EC); and
- iii) Non-interventional studies that are prospective in nature and involve the collection of data from, or on behalf of, individual or groups of health professionals specifically for the study.

Collaborative Working (which includes Joint Working): Activities where the company works with other parties to deliver initiatives which primarily either enhance patient care or are for the benefit of patients, or alternatively benefit the NHS and, as a minimum, maintain patient care.

2 Disclosure's Scope

2.1 Products concerned

The report includes all reportable TOV related to MSD prescription-only medicines.

2.2 Company concerned

The report includes all reportable TOV made to Recipients in the United Kingdom by Merck Sharp & Dohme (UK) Limited, Eyebiotech Limited, as well as Merck & Co., Inc., Rahway, NJ, USA and its subsidiaries and affiliates where those transfers relate to UK recipients.

MSD does not commission third parties to make transfers of value to HCPs or HCOs on its behalf in the United Kingdom.

2.3 Excluded ToVs

Under the EFPIA disclosure framework typically refers to the following:

Meals: and drinks are expressly excluded under the Code from disclosure.

Informational or educational materials and items of medical utility: The nominal value threshold for such materials and items in United Kingdom is £15. Materials & items for patient support to be passed onto the patient (£15) (clause 19.2 & 26.3)

Medical Samples: are excluded from the disclosure report. In accordance with national and/or EU laws and regulations, MSD may supply a limited number of medicinal products on an exceptional basis and for a limited period.

TOV that is part of ordinary course purchases and sales of medicinal products by and between MSD and a HCP (for example a pharmacist) or a HCO.

TOV Related to Patients and non-HCPs

2.4 ToVs date

Direct TOVs are disclosed based on the date the TOV was paid in our finance systems and when the resulting income or benefit was received by the HCO/HCP. Indirect TOVs concerning travel and accommodation are disclosed based on the date that the event took place.

2.5 Direct ToVs

Made directly by MSD for the benefit of a Recipient.

2.6 Indirect ToVs

Indirect TOV through Professional Conference Organisers (PCOs): When an event (e.g., congress, conference, symposium) is organised by a third party and the TOV is paid to that third party, and we know or can identify the HCO that will benefit from the TOV, we will disclose that

TOV under the name of the relevant HCO. As a general principle, we report the full sponsorship amount.

Indirect TOV to HCPs through HCOs: If the TOV paid to a HCO has been forwarded to a HCP, we will disclose the TOV under the name of the relevant HCP.

Indirect TOV through third parties for R&D activities: We will not disclose details of any TOV provided to CROs engaged by us except in the following situations:

- If the CRO is made up of healthcare professionals or is affiliated with a medical institution (such as a university hospital or a publicly funded organisation). In this case, the CRO is treated as an HCO, and any TOV provided to it will be published in line with the local process.
- If the Third Party is used as an intermediary and provides payments to HCPs and HCOs, the TOV will be published in line with the local process.

Indirect TOV through other third parties: TOV made by a third party on behalf of MSD will be disclosed by MSD. Travel agencies engaged by MSD to arrange travel and accommodation for HCPs provide MSD with accurate information with respect to travel and accommodation costs which have been provided to individual participants. MSD discloses the related TOV.

2.7 Non-monetary ToVs

Benefit in kind is a non-monetary transfer of value disclosed based on the financial value of services freely given for the purpose of supporting healthcare, scientific research or education, with no consequent obligation on the recipient to provide goods or services to the benefit of the pharmaceutical company.

2.8 ToVs in case of partial attendances or cancellation and refund

MSD will reimburse any reasonable costs incurred as a result of cancelling or postponing the activity for any reasonable expenses, travel or accommodation arrangements. Since TOV is reported based on what MSD paid, and not what the recipient received, the full amount paid by MSD shall be reported in case of partial attendance. In case of a HCP cancellation, no TOV will be disclosed. For third-party events that are cancelled by the third party independent of the will of MSD and, where the invited HCP does not attend or cancels late when they have agreed to attend, the TOV is disclosed equal to the amount of the costs MSD have not recovered.

2.9 Cross-border activities

Regardless of which MSD entity contracts with or pays a recipient, all HCOs, or HCPs whose primary practice, main professional address or place of incorporation is in the United Kingdom are reported by MSD.

2.10 R&D

Under the EFPIA guidance on disclosure of Non-Interventional Studies (NIS), TOVs relating to NIS that are prospective in nature are reported on aggregate level in the R&D category, whereas TOV relating to retrospective NIS are reported on an individual HCP/HCO named basis in the 'Fee for service and consultancy' category. In case TOV cannot be distinguished whether they report to prospective or retrospective NIS, they are reported on an individual HCP/HCO named basis.

2.11 Voluntary disclosure

Corporate memberships to an academic/medical institution, professional body, think tank or charity are disclosed by MSD in a separate report which is available on the company website for MSD in the UK.

3 Specific considerations

3.1 Country unique identifier

As guidance under the professional code in EFPIA countries, unique identifiers include:

Full name

For HCPs: city of principal practice

For HCOs: city of registration

Country of principal practice

Physical address of the principal practice

These details may only be publicly disclosed in accordance with applicable local personal data protection laws and regulations. The unique country-specific local identifier field will be completed only when the relevant data is available.

Where applicable and possible: a unique country-specific local identifier (e.g. Third-Party Database ID).

3.2 Self-incorporated HCP

Payment is made to the HCP LTD company and TOV is disclosed under the HCP's name.

3.3 Multi-year agreements

Disclosure is made based on the year the actual TOV was provided. The amount that will be disclosed will be the total amount paid by MSD in each year.

3.4 Country specificities

United Kingdom

UK variation: When working with other pharmaceutical companies, Transfers of Value are divided between each of the pharmaceutical companies participating in the project.

UK variation: The link to the collaborative working summaries is included and active within the ABPI submittable Report.

3.5 Quality Checks

Data will be pre-validated before it is consolidated and prepared for disclosure. Data validations are performed regularly throughout the year and cover all sources of data. There are control steps and error reports within the process to immediately identify missing data and mismatches.

4 Data protection legal basis

4.1 Consent collection

Data privacy laws in the UK (the “UK GDPR”) mean that to process personal information about an individual, MSD must identify an appropriate lawful basis before they do so. A Recipient has the right to object to our legitimate interests in disclosure at any time, however, this objection is subject to review by MSD, which will determine whether the HCPs objection outweighs MSD’s legitimate interest in transparency.

4.2 Legitimate interests

MSD processes personal information based on its legitimate interests in the transparency of interactions between MSD, HCPs, and HCOs. This will enable MSD to be as transparent as possible about the nature and scale of its interactions with HCPs. MSD has made HCPs and HCOs in the United Kingdom aware of this by including the details regarding legitimate interest within the engagement contract issued and agreed prior to any activity taking place.

5 Form of disclosure

5.1 Date of publication

The present report was published on 30th June 2026 and lastly modified on June 2026 and covers all TOVs made between 1st Jan – 31st Dec 2025.

5.2 Disclosure platform

The present report is published on Disclosure UK – <http://www.disclosureuk.org.uk>

5.3 Disclosure language

The report is published in English.

6 Disclosure financial data

6.1 Currency

All disclosed TOVs are reported in [GBP]. TOVs paid in other currencies are converted into local currency at the exchange rate applicable on the date the cost is incurred.

6.2 VAT included or excluded

TOV reflects the actual value or cost paid by MSD to the Recipient after taxes have been deducted (NET amount). VAT is included when relevant.

6.3 Calculation rules

When calculating benefit-in-kind TOV, for example in situations where MSD contributes the time of its staff to Collaborative Working Projects, MSD calculates the hourly rate of the relevant staff member and multiplies that hourly rate by the number of hours spent by the staff member on that project, with the figure resulting from this calculation representing the nominal benefit-in-kind TOV made by MSD to the recipient healthcare organisation.

7 Additional Information

All relevant information covered.