



# Merz Pharma UK Ltd

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

**Data year: 2025**

**Year of publication: 2026**

The Association of the British Pharmaceutical Industry (ABPI) Code of Practice 2024 requires all companies to document and publicly disclose certain transfers of value (TOVs) made directly or indirectly to healthcare professionals (HCPs) and healthcare organisations (HCOs) located in Europe (Clauses 28-31).

Each company providing TOVs must publish a note summarising the methodologies used by it in preparing the disclosures and identifying each category of TOV (Clause 28.6).

The term 'transfer of value' (TOV) means a direct or indirect TOV, 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 is one made directly by a company for the value of the recipient. An indirect TOV is one made on behalf of a company 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 TOV (Clause 1.25).

The term 'health professional' (HCP) includes members of the medical, dental, pharmacy and nursing professions and any other persons who in the course of their professional activities may administer, prescribe, purchase, recommend or supply a medicine (Clause 1.9).

The term 'other relevant decision makers' (ORDM) particularly 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 HCPs (Clause 1.13).

The term 'healthcare organisation' (HCO) 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 HCPs or ORDMs provide services (Clause 1.8).

Merz discloses all TOVs to HCPs, ORDMs and HCOs in accordance with its commitment to the ABPI Code of Practice which is aligned with the European Federation of Pharmaceutical Industries and Associations (EFPIA) Code on Disclosure on Transfers of Value.

All required TOVs made in the UK from January 1<sup>st</sup> 2025 to December 31<sup>st</sup> 2025 are disclosed on the ABPI central platform.

This document summarises the approach taken by Merz in calculating the figures provided.



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# 1 Definitions

## 1.1 Recipients

### HCPs and ORDMs

Merz regards all employees of the NHS or any private HCO as HCPs/ORDMs regardless of their professional status. In addition, Merz regards all registered or qualified HCPs as within the scope of disclosure regardless of their NHS status. Part-time employees of Merz who are also an employee of a HCO fall within the scope of disclosure for all payments made by the company. Payments made to HCPs are disclosed by category type (see below) and reflect the total annual amount of TOV made for each category.

### HCOs

Merz regards all hospitals, Integrated Care Systems (ICSs)/, General practitioner (GP) practices and other places of work for HCPs treating patients or providing associated advice or management services related to the treatment of patients as HCOs. In addition, all medical societies (national or local) and all “networks” of HCP associations are regarded as HCOs.

Payments made to HCOs are disclosed by category type (see below) and reported on a per activity basis.

## 1.2 Kind of ToVs

Payments have been disclosed under the following TOV category types:

Collaborative working with HCOs: Merz did not engage in collaborative working in Jan-Dec 2025

Donations and Grants to HCOs: On occasion, Merz is asked by a HCO to provide a financial grant or benefit in kind (BIK). The grant or BIK is declared against the named HCO. Where it is a BIK (e.g. an item of medical equipment) then the recommended retail price of the item is the amount declared against the named HCO.

Contributions towards the costs of meetings organised by HCOs: Merz discloses all payments made to medical associations, HCOs, etc. in relation to support for third party meetings. This includes direct funding such as sponsorship fees or the right to erect an exhibition stand.

Sponsorship of HCPs to attend medical meetings: Merz supports the attendance of HCPs at medical meetings, including conferences and congresses. Merz discloses the associated TOVs against the individual attendee. Where costs are not individually itemised (e.g. the cost of a taxi transferring multiple HCPs from an airport to a conference venue), the total cost is split equally between all those receiving the benefit. Costs declared include registration fees, travel and accommodation.

Fees for service and consultancy, and related expenses: Merz discloses all payments made to HCPs and ORDMs for their services provided to Merz in the form of service and consultancy fees; any related expenses agreed in the fee for service or consultancy contract, including transport and accommodation, are disclosed as related expenses.



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On occasion, a HCO may require that any services provided by its HCP employees cannot be contracted with the individual HCP but must be a service contracted through the HCO. In those instances, the full amount paid by Merz is disclosed against the HCO as a fee for service plus any related expenses.

Research and Development: All payments to HCPs and HCOs related to research and development are disclosed as an aggregate figure in accordance with the ABPI Code of Practice.

## 2 Disclosure's Scope

### 2.1 Products concerned

Prescription only medicines

### 2.2 Company concerned

Merz Therapeutics UK Ltd.

### 2.3 Excluded ToVs

The following TOVs have not been disclosed:

Hospitality costs: the cost of subsistence (food & drinks) is generally not disclosed, unless it forms an integral and inseparable part of the cost of an event, e.g. sponsorship of a third party HCO event.

Informational and educational materials: any information or educational materials provided to HCPs/ORDMs or HCOs have not been disclosed.

Donations to Patient Organisations: any financial support and/or any significant indirect/nonfinancial support made to Patient Organisations have been reported separately on the Merz company website.

Donations to charitable organisations: all TOV made to charitable organisations are outside the scope of disclosure.

### 2.4 ToVs date

1<sup>st</sup> January 2025 to 31<sup>st</sup> December 2025.

### 2.5 Direct ToVs

Include fees for service and consultancy, travel, accommodation and registration fees that are paid directly by Merz to the recipient or service provider for the benefit of a named HCP, ORDM or HCO. Examples include:

- Direct payment for advisory board participation and other contracted services
- Direct sponsorship of conference registration
- Direct grants to healthcare organisations



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### 2.6 Indirect ToVs

Include payments made on behalf of a HCO or via third parties where the Merz can identify the beneficiary. Examples include payments to:

- Agencies or congress organisers for named HCP services,
- Sponsorships that cover identifiable HCP meeting/congress participation costs,
- Payments to institutions that pass on value to individual HCPs
- Sponsorships paid to medical education providers or event organisers on behalf of HCOs

### 2.7 Non-monetary ToVs

Include transfers provided in kind rather than as cash, Examples include:

- Company-funded travel, accommodation, training access
- Educational materials such as textbooks or placebo vials for training purposes.
- Facility or equipment hire to support HCO meeting
- Hospitality at sponsored meetings
- Hospitality associated with contracted services. Where relevant, the company calculates these values using actual cost or fair market value principles.

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

N/A

### 2.9 Cross-border activities

Payments made to HCPs practising in the UK or to UK-based HCOs by Merz's overseas operations are disclosed, regardless of the source of funding.

### 2.10 R&D

All payments to HCPs and HCOs related to research and development are disclosed as an aggregate figure in accordance with the ABPI Code of Practice. These include payments towards eligible activities relating to:

- Clinical trials
- Non-interventional studies and data collection
- Investigator initiated trials (IITs)

### 2.11 Voluntary disclosure

None included.

## 3 Specific considerations

### 3.1 Country unique identifier

N/A – unique identifiers are used by Merz for the disclosure process.



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### 3.2 Self-incorporated HCP

Where a HCP runs a private company for the purposes of their private income, any payments to that organisation is regarded, for disclosure purposes, as a payment to the HCP directly.

Similarly, organisations where the majority of employees or contracted suppliers are comprised of HCPs, the full value of payments made to such organisations associated with the services of a named or identifiable individual is regarded as if it was a direct payment to the HCP.

### 3.3 Multi-year agreements

N/A

### 3.4 Country specificities

N/A

### 3.5 Quality Checks

All activities and payments related to TOV are pre-approved according to Merz standard operating procedures (SOPs). All direct payments are captured via the Merz accounting software. All indirect payments are captured via contracted agencies and the TOV information provided to Merz post event.

All TOV data is collated on a single TOV spreadsheet based upon the Merz accounting software and invoice information, agency submitted TOV information, other Merz affiliate submitted TOV information, and data privacy consent responses. This TOV spreadsheet is utilised to complete the ABPI template for disclosure. The completed ABPI template is uploaded to the ABPI central platform.

## 4 Data protection legal basis

### 4.1 Consent collection

The Data Privacy law requires that Merz obtains permission from individual HCPs/ORDMs to publicly disclose their personal data such as their name, address and individual TOVs. Merz has made every effort to secure and retain a record of the necessary permissions prior to disclosing their data. This has been achieved by asking individual HCPs/ORDMs to sign a disclosure agreement form.

Where consent has been obtained, Merz has declared the TOV against the individual HCP's/ORDM's names.

Where permission has not been obtained, Merz has declared the total TOV as an aggregate figure for all anonymous TOVs made to HCPs (so not against their individual names).

Merz fully supports the principles of transparency and privacy. Information disclosed must remain in the public domain for at least three years from the time of disclosure (Clause 31.2)



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and Merz will document all disclosures and retain the records for at least five years after the end of the calendar year to which they relate (Clause 31.3).

### 4.2 Legitimate interests

Merz has not implemented a legitimate interest policy on the disclosure process.

## 5 Form of disclosure

### 5.1 Date of publication

31/03/2026

### 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

All disclosed amounts are in GBP. Where payments were made in a currency other than UK sterling, the exchange rate on the 23<sup>rd</sup> of March 2026 was used.

### 6.2 VAT included or excluded

VAT included in all disclosed amounts.

### 6.3 Calculation rules

All Transfers of Value (TOVs) – whether monetary or non-monetary are calculated using actual cost or fair-market-value (FMV) principles, in line with ABPI and EFPIA expectations. All values are disclosed in GBP and include applicable taxes with non-GBP payments converted using the exchange rate on the 23<sup>rd</sup> of March 2026.

Direct TOVs (e.g., fees, travel, accommodation, registration) are reported at the actual amounts paid while indirect TOVs made through third parties reflect the portion of payments attributable to identifiable recipients (HCP/HCO). Actual costs are disclosed against each recipient where the TOV can be itemised.

Non-monetary TOVs - including travel, accommodation, educational materials, equipment or software - are valued at actual invoiced cost or FMV. Where textbooks or other educational booklets are provided, the RRP value of the item is disclosed against the HCO.

## 7 Additional Information

N/A