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Napp Pharmaceuticals Limited: Methodological note for HCP/ORDM/HCO disclosure 2025

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This methodological note outlines the approach applied by Napp Pharmaceuticals Limited (NAPP) for the disclosure of transfers of value to HCPs, ORDMs, and HCOs for the 2025 reporting period

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1 Definitions

1.1 Recipients

A Healthcare Professional (HCP): is any registered or otherwise appropriately qualified or certified member of the medical, dental, pharmacy, or nursing professions, or any other person who, during their professional activities, is authorised to prescribe, administer, recommend, purchase, or supply a medicine, medical product, or healthcare service.

Other Relevant Decision Maker (ORDM): is any individual, including those in NHS or other healthcare system roles, who is not a Healthcare Professional, but who may directly or indirectly influence the administration, consumption, prescription, purchase, recommendation, sale, supply, or use of a medicine. This includes, but is not limited to, healthcare-related decision makers and providers such as hospital administrators and other personnel who support Healthcare Professionals in the fulfilment of their professional duties.

Healthcare Organisation (HCO): is any legal entity or organisation that is comprised of Healthcare Professionals and/or Other Relevant Decision Makers, or through which such individuals provide services, and which provides healthcare-related products or services or conducts healthcare research. This includes, but is not limited to, hospitals, clinics, general practice surgeries, foundations, universities or other teaching institutions, medical, scientific or learned societies, and similar organisations whose business address, place of incorporation, or primary place of operation is in Europe.

Retired and Deceased HCPs/ORDMs: Transfers of Value made before an individual’s death will continue to be disclosed, as data protection legislation applies only to living individuals. However, the company recognises the sensitivity of such cases. If contacted by next-of-kin or an employer, the company will review the circumstances on a case-by-case basis, balancing transparency obligations with compassion and the nature of the request. Our approach aims to be consistent, respectful and aligned with PMCPA expectations

1.2 Kind of ToVs

Donations and Grants : collectively mean providing 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. In general, donations are physical items, services or benefits-in-kind which may be offered or requested. Grants are the provision of funds

Collaborative Working: refers to arrangements between one or more pharmaceutical companies, healthcare organisations, and/or other relevant organisations that are undertaken to enhance patient care, benefit patients, or support the NHS, and which, as a minimum, maintain patient care. Such arrangements involve the pooling of skills, experience, and/or resources by all parties for the joint development and implementation of patient- and/or healthcare-centred projects. Joint working represents a limited form of Collaborative Working

Contributions to Costs of Events: refer to transfers of value made to support the organisation of, or attendance at, scientific, educational, or professional events and meetings that comply with the Code. This includes sponsorship or support relating to registration fees, accommodation, travel, and subsistence, provided that the event has a clear educational purpose.

Contracted Service Fees and Expenses: are transfers of value paid to Healthcare Professionals, Other Relevant Decision Makers, Healthcare Organisations, patient organisations, individuals representing patient organisations, or members of the public (including patients and journalists), or to their employers on their behalf, in return for the provision of legitimate and pre-defined services. Such services may include consultancy, speaking or chairing meetings, participation in advisory boards, training activities, medical or scientific studies, clinical trials, market research, and the preparation of articles or publications.

2 Disclosure's Scope

2.1 Products concerned

Disclosure relates only to Prescription Only Medicines (POMs).

2.2 Company concerned

This methodological note applies to Napp Pharmaceuticals Limited. Transfers made directly or indirectly through third parties are included.

2.3 Excluded ToVs

The following items are excluded from disclosure as Transfers of Value:

- Ordinary course purchases and sales of medicines between the company and Healthcare Professionals or Healthcare Organisations.
- Samples of medicines supplied in accordance with applicable legal and Code requirements.
- Inexpensive stationery items provided at bona fide events or meetings (e.g. pens, pencils, and notepads).

- Items for patient support provided to Healthcare Professionals in accordance with the Code.
- Training or demonstration devices without an active ingredient intended to support patient education and correct use of medicines.

2.4 ToVs date

Covers activities and payments carried out from 1 January 2025 to 31 December 2025.

2.5 Direct ToVs

- **Donations and Grants** – financial or in-kind support provided to eligible organisations for healthcare, research, educational, or charitable purposes
- **Collaborative Working Projects** – joint healthcare- or patient-centred initiatives involving pooled resources and shared responsibility
- **Contributions to Costs of Events** – support for attendance at, or organisation of, scientific or educational meetings and events
- **Fees for Service and Associated Expenses** – payments for legitimate, contracted services such as consultancy, advisory boards, speaking engagements, training, and market research

2.6 Indirect ToVs

Transfers made via agencies, event organisers or third-party intermediaries.

2.7 Non-monetary ToVs

- Staff time and expertise provided to support healthcare, research, or educational activities
- In-kind support or services provided without direct financial payment
- Provision of services or resources in lieu of monetary compensation
- Non-financial contributions to collaborative or joint working projects
- Non-monetary support for events, meetings, or educational activities

2.8 ToVs in case of partial attendances or cancellation and refund

Only the value provided is disclosed. Refunds reduce the disclosed amount.

2.9 Cross-border activities

Napp Pharmaceuticals Limited reports Transfers of Value for all countries in the country of the recipient's principal practice, in line with the recipient's primary country of practice. Where the recipient's primary country does not require disclosure, the Transfers of Value are disclosed by Napp Pharmaceuticals Limited the UK entity.

2.10 R&D

Not applicable

2.11 Voluntary disclosure

Disclosure that goes beyond what is required by the ABPI Code is not included.

3 Specific considerations

3.1 Country unique identifier

In line with UK requirements, professional identifiers (such as GMC, GPHC numbers etc) are not submitted to Disclosure UK. Napp Pharmaceuticals Ltd uses internal identifiers solely for validation and reconciliation purposes. These identifiers are stored securely and are not published.

3.2 Self-incorporated HCP

Where a health professional provides services through their own Limited company, Napp Pharmaceuticals Limited discloses the Transfer of Value against the individual health professional rather than the company. This reflects the ABPI Code requirement that ToVs are reported in connection with the individual recipient of the benefit, regardless of the legal structure used to receive payment. Only transfers that meet the definition of a Transfer of Value under the Code are disclosed.

3.3 Multi-year agreements

Transfers are disclosed pro-rata for work completed during the reporting period.

3.4 Country specificities

The company currently has no collaborative working projects or cross-company arrangements that require disclosure. As no such projects exist, there are no associated executive summaries and no links to include on Disclosure UK. Should collaborative working projects be initiated in the future, Transfers of Value would be apportioned according to the contractual agreement between participating companies, and executive summaries would be published as required.

3.5 Quality Checks

Pre-disclosure quality checks are completed by Finance, medical compliance and commercial colleagues, including reconciliation of payment data against internal tracking systems, validation of recipient details and ToV categorisation, and senior management sign-off prior to submission to Disclosure UK.

4 Data protection legal basis

4.1 Consent collection

The company uses Consent as the lawful basis for publishing individual HCP/ORDM information. Appropriate arrangements are in place to ensure recipients are informed of the disclosure process at the point of contracting and during consent collection. Where an individual provides only partial consent, all associated Transfers of Value are disclosed in

aggregate. If consent is withdrawn, the individual's ToVs are moved to aggregate disclosure for the entire reporting period.

4.2 Legitimate interests

The company uses Consent as the lawful basis for publishing individual HCP/ORDM information. Appropriate arrangements are in place to ensure recipients are informed of the disclosure process at the point of contracting and during consent collection. As the company does not rely on Legitimate Interests, balancing tests, rights to object, and related processes are not applicable.

5 Form of disclosure

5.1 Date of publication

30/06/26

5.2 Disclosure platform

Disclosure UK – www.disclosureuk.org.uk

5.3 Disclosure language

English

6 Disclosure financial data

6.1 Currency

GBP (£). Foreign currency amounts are converted using internal NAPP exchange rates.

6.2 VAT included or excluded

Transfers are reported exclusive of VAT.

6.3 Calculation rules

Transfers of Value are calculated based on the actual cost incurred by the company, with in-kind and other non-monetary Transfers of Value valued at the fair market value or equivalent internal cost attributable to the activity, and disclosed on a pro-rata basis during the relevant reporting period, in accordance with the ABPI Code.

7 Additional Information

Records are retained securely and a dedicated person is assigned to respond to ToV-related queries.