

# DISCLOSURE OF TRANSFERS OF VALUE TO RECIPIENTS IN THE UNITED KINGDOM IN 2025

## METHODOLOGICAL NOTE

### Introduction

This methodological note provides a comprehensive description of the methodologies applied by Octapharma Limited in preparing and disclosing transfers of value (ToVs) to healthcare professionals (HCPs), other relevant decision makers (ORDMs), and healthcare organisations (HCOs) in the United Kingdom for the 2025 reporting period. The disclosure is made in accordance with the ABPI Code of Practice for the Pharmaceutical Industry and follows the standardised structure required by EFPIA and PMCPA guidance. This document is intended to provide transparency and context to the data disclosed via Disclosure UK, enabling stakeholders to understand how transfers of value are identified, categorised, validated, and reported.

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## 1. Definitions

### 1.1 Recipients:

Transfers of value are made to healthcare professionals (HCPs), other relevant decision makers (ORDMs), healthcare organisations (HCOs), and patient organisations located in the United Kingdom. Octapharma Limited does not engage with retired healthcare professionals.

In circumstances where transfers relate to deceased HCPs or ORDMs, these cases are assessed individually. Octapharma Limited applies the relevant ABPI Code requirements

and appropriate legal basis for disclosure in force at the time, while acting with sensitivity and, where appropriate, seeking guidance from the ABPI Disclosure UK team.

### **1.2 Kind of ToVs:**

Transfers of value include all categories defined by the ABPI Code. These include, but are not limited to, donations and grants, fees for service and consultancy, sponsorship of meetings and exhibitions, contributions to costs of events, supporting ongoing clinical education meetings, registration, travel, accommodation, and research and development (R&D) activities.

## **2. Disclosure's Scope**

### **2.1 Products concerned:**

This disclosure relates to transfers of value associated with Prescription Only Medicines (POMs).

### **2.2 Company concerned:**

This disclosure is made by Octapharma Limited. It includes transfers of value made by Octapharma Limited and, where applicable, transfers made by other entities within the Octapharma group, including Octapharma AG, to recipients in the United Kingdom. This approach ensures completeness and consistency of reporting.

### **2.3 Excluded ToVs:**

No types of transfers of value have been excluded from disclosure. All relevant transfers are included in accordance with the requirements of the ABPI Code.

### **2.4 ToVs date:**

The reporting period covered by this disclosure is from 1 January 2025 to 31 December 2025. Only transfers of value made within this period are included.

### **2.5 Direct ToVs:**

Direct transfers of value include payments made directly by Octapharma Limited to recipients. These include, for example, consultancy fees, donations and grants, and contributions to costs of events such as registration fees, travel, and accommodation.

### **2.6 Indirect ToVs:**

Indirect transfers of value may occur via third parties, such as charities or event organisers. Octapharma Limited identifies and documents the role of all third parties involved. Where the ultimate recipient is known, the transfer is attributed to that individual; otherwise, it is attributed to the relevant organisation in accordance with ABPI requirements.

## **2.7 Non-monetary ToVs:**

Octapharma Limited does not provide or disclose non-monetary transfers of value within the scope of this disclosure.

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

Cancellations, partial attendance, and refunds are managed in accordance with the ABPI Code and internal contractual arrangements. Transfers of value are adjusted in line with the terms of the agreement and applicable guidance.

## **2.9 Cross-border activities:**

Transfers of value relating to cross-border activities are identified and consolidated by the UK Finance function. Corporate Finance in Switzerland provides data relating to payments made outside the UK, which is reviewed and validated with relevant international business units to ensure completeness and accuracy.

## **2.10 R&D:**

Transfers of value relating to research and development include in vitro and in vivo clinical research, corporate-sponsored studies, and joint initiatives with international business units. These transfers are disclosed in aggregate in accordance with ABPI requirements.

## **2.11 Voluntary Disclosure:**

Octapharma Limited does not disclose transfers of value beyond those required under the ABPI Code.

# **3. Specific Considerations**

## **3.1 Country Unique Identifier:**

No country-specific or commercial identifiers are used in relation to disclosure within the United Kingdom.

## **3.2 Self-incorporated HCP:**

Octapharma Limited does not engage with self-incorporated healthcare professionals in a manner requiring specific disclosure treatment.

## **3.3 Multi-year Agreements:**

Multi-year arrangements may arise, primarily in the context of research activities. Transfers of value are disclosed based on the date of payment, and only payments made within the reporting period are included.

## **3.4 Country Specificities:**

Octapharma Limited does not participate in collaborative working arrangements with other pharmaceutical companies that require disclosure. Accordingly, no links to collaborative working executive summaries are applicable.

### **3.5 Quality Checks:**

Prior to disclosure, data undergoes a series of internal quality checks, including review by the Marketing Manager, independent verification by a member of the Finance team, and validation with international business units to ensure completeness and accuracy.

## **4. Data Protection Legal Basis**

### **4.1 Consent Collection:**

For the period 1 January 2025 to 31 March 2025, Octapharma Limited relied on consent as the lawful basis for disclosure. Recipients were informed of the nature and purpose of disclosure through contractual documentation and supporting materials, and consent was obtained in accordance with applicable data protection requirements. Recipients were able to withdraw consent, and such requests were managed in line with internal procedures and applicable legislation.

### **4.2 Legitimate Interests:**

From 1 April 2025 onwards, Octapharma Limited relies on legitimate interests as the lawful basis for the processing and disclosure of transfers of value. A formal Legitimate Interest Assessment (LIA) has been conducted, including purpose, necessity, and balancing tests, with involvement from legal and data protection stakeholders.

Recipients are clearly informed of the processing through contractual documentation and transparency materials, which explain the nature, scope, and purpose of disclosure. Recipients have the right to object to processing, and any objections are assessed on a case-by-case basis in line with regulatory requirements.

Appropriate technical and organisational measures are in place to protect personal data. Transfers of value are disclosed either on an individual basis or, where required, in aggregate. No partial disclosures are made.

Ongoing monitoring and review processes are in place to ensure continued compliance with GDPR, the UK Data Protection Act, and the ABPI Code.

## **5. Form of Disclosure**

### **5.1 Date of publication:**

The date of publication will be confirmed prior to submission.

## **5.2 Disclosure platform:**

The disclosure is made on Disclosure UK ([www.disclosureuk.org.uk](http://www.disclosureuk.org.uk))

## **5.3 Disclosure language:**

The disclosure is in the English language.

## **6. Disclosure Financial Data**

### **6.1 Currency:**

All transfers of value are disclosed in Great British Pounds (GBP). Where payments are made in other currencies, amounts are converted using the average monthly exchange rate at the time of data preparation.

### **6.2 VAT included or excluded:**

Transfers of value are disclosed inclusive of VAT where applicable.

### **6.3 Calculation rules:**

Calculation rules are applied to ensure that transfers are accurately attributed to the relevant recipient and aggregated where individual disclosure is not possible or not permitted.

## **7. Additional Information**

No additional information is provided.

## **Approval**

Approved by:

Andy Walsh  
Deputy General Manager

Signature: 

Date: 9<sup>th</sup> June 2026