

# HCP/HCO Methodological Note Template



Version: 25/3/2026

Country: United Kingdom

## ORION Pharma UK Ltd: Methodological note for HCP/ORDM/HCO disclosure 2025

Data year: 2025

Year of publication: [2026]

Orion Pharma discloses all Transfers of Value to HCPs, ORDMs and HCOs in accordance with its commitment to the EFPIA Code, and the ABPI Code of Practice in the United Kingdom.

Orion Pharma UK Ltd is a member of the ABPI, and this note summarises the methodologies used by Orion Pharma UK Ltd in preparing Disclosures in compliance with the ABPI Code of Practice.

### Contents

<b>1</b>	<b>Definitions</b> .....	<b>2</b>
1.1	Recipients.....	2
1.2	Kind of ToVs.....	2
<b>2</b>	<b>Disclosure's Scope</b> .....	<b>2</b>
2.1	Products concerned.....	2
2.2	Company concerned .....	2
2.3	Excluded ToVs .....	2
2.4	ToVs date .....	2
2.5	Direct ToVs.....	2
2.6	Indirect ToVs .....	2
2.7	Non-monetary ToVs.....	3
2.8	ToVs in case of partial attendances or cancellation and refund .....	3
2.9	Cross-border activities .....	3
2.10	R&D.....	3
2.11	Voluntary disclosure .....	3
<b>3</b>	<b>Specific considerations</b> .....	<b>3</b>
3.1	Country unique identifier.....	3

3.2	Self-incorporated HCP.....	3
3.3	Multi-year agreements.....	3
3.4	Country specificities.....	3
3.5	Quality Checks .....	3
4	<b>Data protection legal basis .....</b>	<b>3</b>

4.1	Consent collection .....	3
4.2	Legitimate interests .....	4
5	<b>Form of disclosure</b> .....	4
5.1	Date of publication.....	4
5.2	Disclosure platform.....	4
5.3	Disclosure language.....	4
6	<b>Disclosure financial data</b> .....	4
6.1	Currency.....	4
6.2	VAT included or excluded .....	4
6.3	Calculation rules.....	4
7	<b>Additional Information</b> .....	4

# 1 Definitions

## 1.1 Recipients

The ABPI Code defines the following terms:

- **Healthcare Organisation (HCO):**

A healthcare, medical or scientific association or organisation (e.g., 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.

If a healthcare organisation consists of only one health professional or other relevant decision maker, then it would be subject to the requirements in the Code regarding individual health professionals.

- **Healthcare Professional (HCP):**

A member of the medical, dental, pharmacy or nursing profession or any other person who, in the course of their professional activities, may prescribe, purchase, supply, recommend or administer a medicine and whose primary practice, principal professional address or place of incorporation is in Europe.

- **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 health professionals.

## 1.2 Kinds of ToVs:

Transfer of Value (ToV):

Direct and indirect transfers of value (in payments or kind or otherwise made) in connection with the development or sale of medicines for prescribing for human use whether for promotional services or otherwise. Direct ToVs are those made directly by Orion Pharma UK Ltd for the benefit of a Recipient. Indirect are those made on behalf of Orion Pharma for the benefit of a Recipient, or those made through a Third Party and where Orion Pharma knows or can identify the Recipient that will benefit from the Transfer of Value.

### 1.2.1 HCO Donations and Grants

Contribution to donations (physical items, services or benefits-in-kind) and grants (provision of funds), which are given for the purpose of supporting healthcare, scientific research or education.

### **1.2.2 HCP/HCO Registration fees**

Fee paid to allow an HCP or member of an HCO to attend a congress, course, educational event.

### **1.2.3 HCP/HCO Travel & Accommodation**

Examples: flight, train, taxi, hotel. Meals are excluded, except where breakfast is included in the hotel room rate amount

### **1.2.4 HCO Sponsorship**

All expenses agreed with an HCO (e.g. booth hire, advertisement space, space for satellite symposia, and contribution towards the cost of meetings).

### **1.2.5 HCP/ HCO Fee for Service**

Compensation provided for any kind of services provided by an HCP or member of an HCO (e.g. speaker fee, consultant fee, compensation for market research when the identity of the HCP is clear, speaker training, medical writing and data analysis).

### **1.2.6 HCP/HCO agreement related expenses**

Travel and accommodation or any other expense as per the fee-for-services agreement (e.g. taxi, mileage or out of pocket expense).

### **1.2.7 Research & Development related expenses**

HCO/HCP transfers of value that relate to the planning and conduct of: Non-clinical studies (as defined in OECD Principles on Good Laboratory Practice); Clinical trials (as defined in Regulation 536/2014); Non-interventional studies that are prospective in nature and that involve the collection of patient data from or on behalf of individual, or groups of, HCPs specifically for the study.

### **1.2.8 HCO Collaborative Working**

Contribution to working with organisations to deliver initiatives which either enhances patient care, benefits patients or benefits National Health Service (NHS) and maintains patient care. Joint working is a limited form of collaborative working.

## **2 Disclosure's Scope**

### **2.1 Products concerned**

The disclosures included in this report relate to direct and indirect transfers of value (in payments or kind or otherwise made) in connection with the development or sale of medicines for prescribing for human use whether for promotional services or otherwise.

It does not include transfers of value in relation to activities concerning animal products, over-the-counter medicines or medical devices.

## **2.2 Company concerned**

The disclosures contained in the 2025 disclosure report, represent the Transfers of Value made by Orion Pharma Global /Orion Corporation, a global pharmaceutical company headquartered in Finland, and its subsidiary companies across Europe, including Orion Pharma UK Ltd., to HCPs, HCOs and ORDMs with their primary place of work or incorporation/business address in the UK.

Transfers of Values to recipients from outside the UK have not been included in this report but disclosed in the EFPIA disclosure database or other relevant data platforms.

## **2.3 Excluded ToVs**

Transfers of value relating to remuneration of HCPs who are full-time employees of Orion Pharma UK Ltd.

## **2.4 ToVs date**

Orion Pharma (UK) Ltd discloses all Transfers of Value it makes between 1 January and 31 December of one year by 30th June of the following year. The date of a Transfer of Value is defined as the date when the payment relating to the transfer of value is executed (payment date).

## **2.5 Direct ToVs**

Direct Transfer of Values are those made directly by Orion Pharma UK Ltd.for the benefit of a recipient.

## **2.6 Indirect ToVs**

Indirect Transfer of values are made on behalf of Orion Pharma UK Ltd. through a third party and where Orion Pharma UK Ltd.knows or can identify the Recipient that will benefit from the Transfer of value.

## **2.7 Non-monetary ToVs**

Non-monetary ToVs may include receipt of services, e.g. staff time and nursing services by an HCO, and benefiting from educational events, medical writing support etc. by an HCP.

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

Orion Pharma UK Ltd will disclose details only if an HCP/HCO/ORDM actually receives the benefit of the transfer. Orion Pharma UK Ltd will not disclose a transfer of value in case of cancellations, even if Orion Pharma UK Ltd incurred a cost in the process.

## **2.9 Cross-border activities**

Cross-border situations arise when an agreement is concluded with a UK HCP, HCO or ORDM, and the ToV paid by Orion Pharma Global, or an Orion Pharma subsidiary in a country other than the UK, to a UK HCP, HCO or ORDM.

Cross-border activities are verified through interrogation of Orion Pharma's EFPIA transfer of value reporting database and enterprise system (SAP) and confirmed with the Global Finance team. Payments in foreign currency are then converted to GBP using the official exchange rate published by the HMRC as at the 31<sup>st</sup> of December 2025.

The 2025 Disclosure includes six cross-border activities: three relating to HCPs and 3 relating to HCOs.

## **2.10 R&D**

The Research and Development Transfers of Value disclosed in the 2025 disclosure relate to the transfers of value made to healthcare professionals and healthcare organisations engaged in the conduct of two prospective clinical trials: the TEADES and CYPIDES studies. Orion reports R&D transfers of value in the aggregate figure.

## **2.11 Voluntary disclosure**

No voluntary disclosures are included in the Transfer of Value disclosures for 2025.

# **3 Specific considerations**

## **3.1 Country unique identifier**

The recipients of the transfers of value included in the 2025 disclosure are HCPs, HCOs and ORDMs with their primary place of work or registration in the United Kingdom, regardless from which country the transfer has been made.

No specific country unique identifier has been applied.

## **3.2 Self-incorporated HCP**

Where services are provided by a personal service company set up by a HCP or ORDM and the HCP or ORDM is the sole director of the company, Orion Pharma UK Ltd will consider the recipient as an individual HCP/ORDM and disclose the Transfer of Value to the individual. However, where the individual, at the time of contracting, exercised their rights under privacy law to object to individual disclosure, Orion Pharma UK Ltd will disclose against the limited company/HCO.

### **3.3 Multi-year agreements**

Where a contract for any Transfer of Value listed in Section 4, runs for more than one year, Orion Pharma will disclose Transfers of Value relating to that contract in the year the Transfer of Value was made (which may be different to the year in which the contract was agreed).

### **3.4 Country specificities**

Orion Pharma UK Ltd has not engaged in any collaborative arrangements with other pharmaceutical companies or Healthcare Organisations during the 2025 disclosure period.

### **3.5 Quality Checks**

Pre-disclosure quality checks have been undertaken by Orion Pharma UK Ltd.'s Finance team to verify payments made and comparing data reported in Orion Pharma's enterprise system (SAP) with individual agreements with HCPs and HCOs.

A secondary quality check has been performed by Orion Pharma's healthcare compliance team in that two separate individuals reviewed all Transfers of Value line by line for conformance to the disclosure requirements laid out in the ABPI Code of Practice (2024).

Orion Pharma UK Ltd is confident that the data included in the disclosure report is to the best of our knowledge a complete and accurate account of the ToVs made by or on behalf of Orion Pharma UK Ltd. to HCP/HCOs located in the United Kingdom for the period of 01 January 2025 to 31 December 2025.

## **4 Data protection legal basis**

### **4.1 Consent collection**

Orion Pharma UK Ltd fully supports the principles of transparency and abides by data privacy law.

While Orion Pharma UK Ltd is moving towards *Legitimate Interests* as legal basis for disclosure, *consent* has still been the legal basis for the majority of Transfer of Values reported in the 2025 disclosure.

Where individuals exercise their rights under the privacy law to object to individual disclosure, their data is reported in the aggregate. If they exercise this right after publication of the Transfer of Value data, their data will be removed or amended from the publication in the Disclosure UK portal as soon as reasonably practicable and will be included in aggregate.

Disclosures must remain in the public domain for a minimum of three years, and Orion Pharma will document all disclosures and retain records for at least 7 years.

## 4.2 Legitimate interests

*Legitimate interest* has not been the legal basis for the majority of Transfer of Values reported in the 2025 disclosure but will be for future disclosures.

Where it has been used as the legal ground for disclosing an individual transfer of value, an appropriate privacy notice or a link to it has been included in relevant contracts notifying individuals that the legal basis for disclosure is legitimate interest. Where no such notice has been included, the legal basis remained consent.

Where individuals exercised their rights under data privacy law to object to individual disclosure, a balancing test was conducted to assess whether there were compelling grounds for publishing the data on disclosure UK that override the interests or the fundamental rights and freedoms of the objecting individual.

# 5 Form of disclosure

## 5.1 Date of publication

The Orion Pharma (UK) Ltd. disclosure report will be published within 6 months of the end of each calendar year, and will remain publicly available for a period of 3 years.

## 5.2 Disclosure platform

The Orion Pharma (UK) Ltd. disclosure report will be published on ABPI Disclosure UK platform [www.disclosureuk.org.uk](http://www.disclosureuk.org.uk).  
Hyperlinks to ABPI Disclosure UK platform will be published on the Orion Pharma (UK) Ltd website [www.orionpharma.co.uk](http://www.orionpharma.co.uk)

## 5.3 Disclosure language

The Orion Pharma (UK) Ltd. disclosure report will be published in English, according to the processes defined for the ABPI Disclosure UK platform.

# 6 Disclosure financial data

## 6.1 Currency

Orion Pharma (UK) Ltd reports all Transfers of Value in Pound Sterling (GBP). Any amounts where the Transfers of Value have been in a foreign currency have been converted using the official currency exchange rate published by the HMRC as at 31/12/2025.

## 6.2 VAT included or excluded

Orion Pharma UK Ltd publishes all amounts exclusive of VAT, except in instances where VAT cannot be recovered in accordance with the VAT regulations. Where VAT cannot be recovered, the gross amount is disclosed.

## 6.3 Calculation rules

Where one ToV payment is covering multiple recipients, that payment amount will be divided equally across all attending recipients, and those divided amounts included in the individual recipient totals.

The official exchange rate published by the HMRC as at 31/12/2026 has been used for all transactions requiring converting foreign currency to GBP.

## **7 Additional Information**

Transfers of Value to HCPs or ORDMs reflect fair market value, taking into account the nature of services rendered, the amount of time spent, and the knowledge and expertise of the HCP or ORDM.

Where Orion Pharma UK Ltd. makes a Transfer of Value to a HCP indirectly via a HCO, it discloses such transfer only once.

Where services are provided by a 3rd party provider on behalf of several HCPs/HCOs (e.g., to provide national/regional educational meetings) and the recipient HCPs/HCOs cannot be individually identified, Orion Pharma UK Ltd. will disclose against the 3rd party provider.

When Orion Pharma UK Ltd is party to a co-promotion agreement, Orion Pharma UK Ltd. discloses only Transfers of Value made by Orion Pharma, except where the other contracting party is an HCP or HCO, in which case Orion Pharma UK Ltd. is responsible for disclosing all Transfers of Value in connection with the agreement.