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## 1. Definitions

### 1.1 Recipients

For the purposes of this Methodological Note, Recipients include Healthcare Professionals (HCPs) practicing their profession in the United Kingdom, Healthcare Organizations (HCOs) and Patient Organizations (POs) based in the United Kingdom, as defined under the EFPIA Code on Disclosure of Transfers of Value.

Since disclosures shall be made pursuant to the national code of the country where the Recipient has its primary practice or place of incorporation, as the case may be, Pharma Mar declaration is regulated by the ABPI Code of Practice 2024.

### 1.2 Kind of ToVs

Transfers of Value (ToVs) include direct and indirect transfers, whether monetary or non-monetary, provided to HCPs, HCOs, or Patient Organizations (POs), in accordance with applicable EFPIA and national codes.

Donations and Grants: Providing funds, assets or 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 Pharma Mar in return.

Sponsorship: Support provided by or on behalf of Pharma Mar as a contribution to support an activity (including an Event) performed, organised or created by a HCO, a PO or a Third Party.

Events: All professional, promotional, scientific, educational meetings, congresses, conferences, symposia, and other similar events (including, but not limited to, advisory board meetings, visits to Pharma Mar research facilities, and planning, training or investigator meetings for clinical trials) organised or sponsored by or on behalf of Pharma Mar.

Service provision: contractual arrangements with Healthcare Professionals (HCPs) or Healthcare Organizations (HCOs) for specialized expertise in exchange for services that support healthcare, research, or education in which Pharma Mar pays a fee for that service according to Fair market values (FMV).

Collaborations/sponsorships with Healthcare Organizations/third parties assigned by Healthcare Organizations for event management: Support provided by Pharma Mar to an activity, including an event, organized by an HCO, Patient Organization, or Third Party. When an HCO uses a third party to manage a pharmaceutical company-sponsored event, it's considered an indirect transfer of value. Payments made by a third party on behalf of Pharma Mar for things like travel or registration for a Healthcare Professional are considered indirect transfers of value and therefore, they are disclosed accordingly.

Collaborations with Patient Organizations: Sponsorships or partnerships aimed at incorporating patient perspectives throughout a medicine's lifecycle, from research to disease awareness or to support those Patients organisations in achieving and aiming their statutory objectives such as improving patient outcomes, raising awareness of diseases, improving patients' quality of life, supporting carers, etc.

Research and Development Transfers of Value: Transfers of Value to HCPs or HCOs 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 Regulation N° 536/201415); or (iii) 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 (Section 15.01 of the HCP Code). In this definition, preclinical studies are not included and therefore they are not incorporated in Transfer of Value reports made by Pharma Mar.

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

This methodological note is referred to any Transfer of Value made by Pharma Mar S.A. during 2025 to any HCP practicing their profession in the United Kingdom or HCO headquartered in the United Kingdom.

### **2.1 Products concerned**

All prescription-only medicinal products marketed or under development by Pharma Mar are included, in line with EFPIA and the ABPI requirements.

### **2.2 Company concerned**

Pharma Mar does not currently have company presence in the United Kingdom and does not promote its products in the United Kingdom. In this regard, Pharma Mar has engaged a third party (a pharmaceutical company) as a commercial and promotional distributor through an exclusive commercialization and distribution agreement, by way of which such distributor has contractually assumed the marketing and promotion of Pharma Mar's authorized product/s in the UK, including the discharge of obligations relating to the documentation and disclosure of Transfers of Value made to Healthcare Professionals, Healthcare Organizations and Patient Organizations, in compliance with all applicable laws, rules and applicable codes of practice in the territory.

### **2.3 Excluded ToVs**

Transfers of Value that are explicitly excluded under the EFPIA Code and the ABPI Code of Practice 2024 are not disclosed.

Please note that the amount related to Research & Development shall not include those cases in which Pharma Mar cannot ascertain the specific amount which has been transferred to the relevant HCP that acts as an investigator in the conduction of a clinical trial, or which has been transferred to an HCO, whatever the category of the Transfer of Value may be. In this regard,

Pharma Mar shall not include under the “Research and Development Transfers of Value” category, any payments done to Clinical Research Organizations (CRO) acting on behalf of Pharma Mar in the conduction of a clinical trial where the amount of the Transfer of Value, the category and/ or final recipient of the transfer of value cannot be ascertained in a reliable form under the methodology used by Pharma Mar and we will disclose those amounts in full in the “Research and Development Transfers of Value” section of Disclosure of Pharma Mar S.A. in Spain (i.e., the contracting company) instead.

#### **2.4 ToVs date**

Only Transfers of Value that took place during the reporting year 2025 are included in this disclosure, irrespective of the date of the underlying agreement or date of payment.

#### **2.5 Direct ToVs**

Direct Transfers of Value are those made directly by Pharma Mar to an HCP or HCO without the involvement of an intermediary (e.g., fee for service).

#### **2.6 Indirect ToVs**

Indirect Transfers of Value include those made through third parties, such as Clinical Research Organizations or event organizers, where the ultimate beneficiary is an HCP or an HCO and the transfer can be reliably identified.

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

Non-monetary Transfers of Value include benefits provided in kind, such as accommodation, travel, or registration fees, where applicable and permitted.

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

If a Healthcare Professional cancels his/her attendance at a meeting/congress, the expense already incurred by Pharma Mar will not be allocated to him/her, as long as feasible (e.g. very late notifications).

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

Transfers of Value related to cross-border activities are disclosed in the country where the Recipient has its physical address, in accordance with EFPIA rules. In those cases where it is not possible or feasible using reasonable means, to break down or split costs by country because they are centralised or overhead costs, these will be all included in the ToV report for Spain, as this is the parent company.

## **2.10 R&D**

Transfers of Value to British HCP/HCO related to Research & Development that can be clearly linked to activities as defined on the Art 23.05 & Schedule 1 of the EFPIA Code on Disclosure of Transfers of Value have been declared as an aggregate amount under the “Research and Development Transfers of Value” category.

The amounts disclosed under "Research & Development" caption correspond to payments made to HCOs and may include as underlying concepts not only Investigators payments and grants, but also administrative fees, concomitant medication, expenses on diagnostics tools and other similar concepts.

## **2.11 Voluntary Disclosure**

Any voluntary disclosures made beyond mandatory requirements follow the same methodological principles outlined in this note.

## **3. Specific considerations**

### **3.1 Country unique identifier**

Recipients are identified using their official name and professional or registered address in the UK, in line with local requirements.

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

In the interest of maximising transparency, and in line with the principles set out in the ABPI Code and associated Guidance, Pharma Mar recognises that, generally, engagements with Healthcare Professionals (HCPs) are entered into on the basis of their individual expertise, qualifications and professional experience. Therefore, where an HCP operates through a self-incorporated entity (such as a limited liability company), Pharma Mar will, wherever reasonably practicable and subject to applicable data protection and contractual considerations, disclose the relevant Transfers of Value under the name of the individual HCP rather than the legal entity or any third-party company.

This approach is intended to ensure that disclosures accurately reflect the real and/or ultimate beneficiary of the engagement and support a high level of clarity and accountability in Pharma Mar reporting.

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

For multi-year agreements, Transfers of Value are disclosed in the reporting year in which the value is transferred, not when the contract is signed.

### **3.4 Country specificities**

Disclosures in the United Kingdom are governed by the ABPI Code of Practice 2024.

Transfers of Value to Patient Organizations are disclosed separately, including the nature of support, monetary value of financial support and of invoiced costs, and the non-monetary benefit that the PO receives when the non-financial support cannot be assigned to a meaningful monetary value and/or the total amount paid per Patient Organization over the Reporting Period. List of Patient Organizations includes a description of the nature of the support or services provided without divulging confidential information.

Where activities involve the Pharma Mar Foundation, disclosures are made in accordance with the country of practice of the Recipient. In the event that any of these activities involve a transfer of value as specified in the EFPIA Code or the ABPI Code of Practice 2024, including the granting of awards to healthcare professionals, these will be included in the respective transparency reports. In the case of transfers of value relating to Healthcare Professionals practicing in the UK and UK Healthcare Organizations or Patient Organizations, in the interests of greater transparency and to facilitate easier and proper access to information, they will be included separately and distinctly at the end of the Pharma Mar UK report.

### **3.5 Quality Checks**

Transfers of Value for a certain event can be committed up to a total amount previously approved by the Pharma Mar Management. Any contribution to HCO or HCP must be requested on written form; every request is evaluated and approved on a case-by-case basis by the Pharma Mar Management. Records with the details (name, working address, amount transferred) of the HCP or HCO to whom any Transfer of Value was done are kept in electronic format. For those Events, where the approval is based on a budgeted quantity, reconciliation is done once the invoices arrive, aiming to reflect the real amount spent and not the budgeted one.

The engagement with the HCP/HCO is arranged by way of a formal written agreement, which identifies the Recipient of the Transfer of Value, the subject matter of the arrangement, the amount of the Transfer of Value as well as other material provisions that may be deemed necessary between the parties. To issue the current Disclosure of Payments to HCP/HCO in the UK during 2025, all the electronic records of Transfers of Value have been compiled and reviewed to avoid HCP/HCO duplications. The final list of HCP/HCO has been manually confronted with this obtained from the written agreements to identify those individuals/organizations which do request an aggregated declaration of their Transfers of Value.

## **4. Data protection legal basis**

### **4.1 Consent collection**

Under the “individual name disclosure” category, only Healthcare Professionals and Healthcare Organizations that have granted explicit consent have been included.

The rest of them will be included under the “aggregate disclosure” categories. When despite Pharma Mar’s efforts, the HCP/HCO neither gave its permission, nor its refusal to the individual publication of their Transfers of Value, Pharma Mar will disclose the amounts transferred on an aggregated basis. In the same way, if HCPs/HCOs consent on some occasions and not in others, all payments will be disclosed on an aggregated basis, which will not be misleading or contrary to the spirit of transparency.

Throughout 2025, Pharma Mar has required every UK HCP/HCO to whom it has made a Transfer of Value to provide identification and grant personal consent in a formal written agreement thereby authorizing Pharma Mar to obtain and store the relevant personal data and to appropriately disclose and publish the Transfers of Value made to such HCPs/HCOs on an individual basis.

The information published on the Pharma Mar website will be available for a minimum period of three years from its publication, unless (i) a shorter period is legally established, or (ii) the Recipient revokes their consent, and such revocation is legally binding on Pharma Mar.

### **4.2 Legitimate interests**

Where consent is not granted, or neither granted nor refused despite reasonable efforts, Transfers of Value are disclosed on an aggregated basis, relying on legitimate interests and in line with EFPIA and national code requirements.

## **5. Form of disclosure**

### **5.1 Date of publication**

The disclosure report is published annually within the timeframe established by the EFPIA Code and the ABPI Code of Practice 2024. The data must be made publicly available annually, within 6 months after the end of the relevant reporting period, generally by April.

### **5.2 Disclosure platform**

The disclosure is made available on the relevant PharmaMar website dedicated to transparency reporting: <https://pharmamar.com/en/#> and additionally it is directly reported to ABPI.

### **5.3 Disclosure language**

The disclosure and this methodological note are published in English.

## **6. Disclosure financial data**

### **6.1 Currency**

All Transfers of Value are disclosed in British Pound (GBP).

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

Amounts disclosed do not include Value Added Tax (VAT).

### **6.3 Calculation rules**

Where required the amount in Euros have been translated into GBP multiplying by a factor of 0.8535, which is the average of all daily exchange rates of the Euro against GBP in 2025 ([December 2025 HMRC currency exchange average rates - GOV.UK](#) ).

Where costs cannot be individually identified but can be applied to a number of individuals, total costs are allocated proportionally among them i.e. accommodation total costs divided into “nights” and applied proportionally to the HCP hosted.

## **7. Additional Information**

The Transfer of Value published on our website is to support and fulfil requirements on transparency and obligations derived from the ABPI Code of Practice 2024. The publication of this information does not give general permission to those parties accessing it to undertake additional processing of the data, such as crossing the data with information published in websites of other members, for their own benefit, as personal data protection should always be taken in consideration when processing personal data as necessary in each country. Information included in ToV report is intended to be non-indexable.

As part of the PharmaMar Group's commitment to science and research, the PharmaMar Foundation was created in 2023. The purpose of this non-profit entity is to promote scientific progress, foster research and medicine, disseminate knowledge and protect marine biodiversity. Among its activities, it is foreseen to develop outreach and training activities and to award scholarships and grant prizes, among others that may include UK organizations.