

HCP/HCO Methodological Note



LABORATOIRES

Pierre Fabre

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Country: United Kingdom

Pierre Fabre Limited (PFL): Methodological note for HCP/ORDM/HCO disclosure 2025

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1 Definitions

1.1 Recipients

Recipients include Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs), and Healthcare Organisations (HCOs) who received a Transfer of Value (ToV) from Pierre Fabre during 2025. HCPs include any individual authorised to prescribe, administer, recommend or purchase prescription-only medicines.

Payments relating to retired HCPs, or those who have transitioned to non-practising status, will be assessed on a case-by-case basis to ensure an ethical and compliant approach to disclosure. In such situations, PFL will disclose ToVs in a manner that maintains transparency while respecting personal circumstances. Should a recipient pass away or undergo a change in professional status during the reporting period, PFL will take appropriate steps to ensure the disclosure remains accurate, transparent, and aligned with Disclosure UK principles

1.2 Kind of ToVs

Transfers of Value include donations, grants, event support, consultancy fees, and related expenses, in line with EFPIA/ABPI reporting categories.

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 Pierre Fabre Ltd for the benefit of a Recipient. Indirect ToVs are those made on behalf of Pierre Fabre Ltd for the benefit of a Recipient, or those made through a Third Party and where Pierre Fabre Ltd knows or can identify the Recipient that will benefit from the Transfer of Value.

2 Disclosure's Scope

2.1 Products concerned

Pierre Fabre Limited consists of two divisions: Pharmaceutical and Dermo-Cosmetic. Disclosure applies to ToVs made in the context of activities which are completely or partially related to Prescription Only Medicines (POMs). Such activities comprise donations and grants, scientific and professional meetings (sponsorships, costs for registration, travelling and accommodation), services and consultancies (fees and related costs), and Research & Development.

2.2 Company concerned

Disclosures refer to activities that fall under the scope of the Code and are undertaken by Pierre Fabre Ltd or any affiliated entity.

2.3 Excluded ToVs

Corporate charitable donations not directed to HCOs or linked to healthcare activities

2.4 ToVs date

This report covers payments made between 1st January and 31st December 2025, by Pierre Fabre to HCPs, ORDMs and HCOs whose principal place of practice is the UK, in relation to activities and events. All transfer of values was disclosed on the date in which payment was made to the beneficiary, rather than the date the service was rendered, or an event took place.

Pierre Fabre discloses the following Transfers of Value it makes to HCOs:

- **Donations:** Benefits in kind provided to HCOs for specified use
- **Grants:** Funding provided to HCOs in response to a request to support a specific activity for the purpose of supporting healthcare, scientific research or education.
- **Congress and educational event sponsorship:** Expenses related to the sponsorship of HCOs as congress organisers and/or secretariats in exchange for corporate benefits at an event (e.g., booth space, hosting of a symposium, stands, advertising on programmes or banners and room hire) or catering if paid on behalf of an HCO. This may also include activities such as preceptorships, where expenses are paid to HCOs for arrangement of educational events.
- **Fees:** Transfers of Value that are fees for service resulting from or related to contracts between companies and institutions, organisations or associations of Healthcare Professionals under which such institutions, organisations or associations provide any type of services to a company or any other type of funding not covered in the previous categories. Expenses relating to Fees will be disclosed separately as 'Expenses agreed in the contracted services fee'.

Pierre Fabre Ltd discloses the following Transfers of Value it makes to HCPs & ORDMs:

- **Congress and educational event registration fees:** Expenses related to the registration of an HCP to attend a congress or educational event.
- **Travel:** Expenses related to the provision of travel to HCPs or ORDMs in relation to a fee for service contract (e.g., rail travel, taxi travel, flights, reimbursement of private car miles) or

to their attendance at an educational event. Where travel expenses are required for the provision of a fee for service, these will be disclosed in the category of 'contracted services expenses. Where there is no provision of services and they relate to contribution to costs of an educational event they will be disclosed in the category of 'Contribution to costs of events, Travel and accommodation'.

- **Accommodation:** Expenses related to the provision of overnight accommodation of HCPs or ORDMs in relation to a fee for service contract or to their attendance at an educational event. Where they are required for the provision of a fee for service, these will be disclosed in the category of 'Contracted services expenses. Where here is no provision of services and they relate to contribution to costs of an educational event they will be disclosed in the category of 'Contribution to costs of events, Travel and accommodation'.

- **Fees:** Transfers of Value paid to Healthcare Professionals to provide services to Pierre Fabre. These may include advisory board services, speaker services or other consulting services. Fees and Transfers of Value relating to expenses agreed in the written agreement covering the contracted service will be disclosed as two separate amounts, under the 'Fees' and 'Expenses' category.

Pierre Fabre discloses Transfers of Value to HCPs and HCOs that relate to research and development.

2.5 Direct ToVs

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 Pierre Fabre Ltd for the benefit of a Recipient

2.6 Indirect ToVs

Where payment is made to third parties organising events, include scientific professional meetings, congresses, conferences, symposia, and other similar events. on behalf of a single HCO, these are recorded as a ToV to the HCO beneficiary. If several HCOs or HCPs benefit, the ToV is reported against the third party (sometimes known as a Professional Conference Organiser (PCO)).

2.7 Non-monetary ToVs

No non-monetary service has been made in 2025

2.8 ToVs in case of partial attendances or cancellation and refund

In the event of non-attendance at a Pierre Fabre organised meeting.

- Travel or accommodation on behalf of a HCP/ORDM to attend a Pierre Fabre organised meeting, when the HCP/ORDM is unable to attend the meeting will not be reported.
- In the event of partial or non-attendance at third-party events/congresses
- Pre-paid registration fees to attend a third-party meeting and the HCP/ORDM is unable to attend, are not reported.
- Cancellation fees are not reported.

- HCP/ORDM partially attending an event any ToV is disclosed.

For a Pierre Fabre organised meeting that is then cancelled the HCP/ORDM is paid fee for service for preparation time only

2.9 Cross-border activities

All UK based HCPs, ORDMs, and HCOs that have received reportable ToV as a result of interactions with any Pierre Fabre entity will have the resulting ToV reported in the UK. All disclosures are made in the country in which the HCP / ORDM primarily practices, or in which the HCO has its legal domicile.

2.10 R&D

'Research and Development Transfers of Value' means, for the purposes of disclosure, ToV to health professionals or healthcare organisation related to the planning or conduct of:

- I. Non-clinical studies (as defined in the OECD Principles on Good Laboratory Practice)
- II. Clinical trials (as defined in Regulation 536/2014)
- 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, health professionals specifically for the study.

Pierre Fabre will include ToVs related to Pierre Fabre sponsored studies as well as non-Pierre Fabre-sponsored studies in the R&D category.

2.11 Voluntary disclosure

Not applicable.

3 Specific considerations

3.1 Country unique identifier

To ensure HCPs and HCOs are correctly identified, we use the OneKey number as the primary unique identifier. When a OneKey number is not available, we verify details against contracts—such as place of work and GMC number—to confirm the accuracy of the information entered, including the HCP's full name as reported."

3.2 Self-incorporated HCP

For self-incorporated HCPs, the contracted services agreement is issued directly to the individual HCP, along with the required consent form. When the HCP signs the agreement and provides consent to be disclosed on a named basis, the disclosure report will reflect the HCP's individual name rather than the name of their limited company. This approach is consistent with previous disclosures, where—despite operating through a limited company—the HCP agreed to be named personally.

If, at the time the contract is issued, the HCP requests that the agreement be made in the name of their limited company, the payment will then be disclosed against the limited company rather than the individual HCP.

3.3 Multi-year agreements

Where contracts are valid for more than one year, and subject to milestone payments, the ToV is captured and disclosed in the year where payment against the achieved milestone(s) was made.

3.4 Country specificities

Collaborative Working: Funding provided (or benefits in kind) as part of a project with an HCO aimed at enhancing patient care or is for the benefit of patients or alternatively benefits the NHS and, as a minimum, maintains patient care providing it is carried out in a manner compatible with the Code.

No payments in relation to Collaborative Working projects were made in 2025

3.5 Quality Checks

Prior to reporting, Pierre Fabre internal processes ensures that ToVs made to HCPs, ORDMs, HCOs and POs are accurately collected in Pierre Fabre. Data quality checks are performed to ensure that any HCP who did not consent is reported in 'aggregate' and additional data, and process monitoring takes place for quality assurance prior to reporting.

4 Data protection legal basis

4.1 Consent collection

In 2025, Pierre Fabre Limited (PFL) obtained consent from Healthcare Professionals (HCPs) to disclose Transfers of Value (ToVs) on an individual, named basis. Where an HCP chose not to provide consent, any associated ToVs were disclosed in aggregate in accordance with Disclosure UK requirements. Partial consent was also accommodated; if an HCP agreed to disclose certain payments but not others, only the non-consented payments were reported in aggregate.

Withdrawal of consent is managed during the pre-publication review period. During this phase, HCPs are notified of the payments recorded for them on the Disclosure UK portal and are given the opportunity to request changes to their consent status. If an HCP submits a request to withdraw consent, PFL acts promptly to update the disclosure record accordingly. Up to the time of contract signing and initial consent capture, PFL had not received any requests from HCPs to withdraw their consent.

4.2 Legitimate interests

As of January 2026, Pierre Fabre Ltd has adopted legitimate Interest as the lawful basis for processing data for disclosure purposes.

5 Form of disclosure

5.1 Date of publication

ToVs are reported for one calendar year and disclosed in June of the following year..

5.2 Disclosure platform

The transparency report is available on the ABPI's Disclosure UK platform. The annual report will remain on the website for three years and all the related documentation is to maintained for a minimum of 5 years.

5.3 Disclosure language

The transparency report is available in English.

6 Disclosure financial data

6.1 Currency

All transfer of value payments is reported in Great British Pounds (GBP).

If a payment was not made in GBP, the conversion rate applied was the rate that was provided by Pierre Fabre's Corporate Disclosure platform on the date the disclosure report was extracted.

6.2 VAT included or excluded

Where possible direct payments are disclosed exclusive of VAT. ToV for travel and accommodation (e.g., flight ticket, hotel room, etc.) are reported inclusive of VAT, where applicable.

Payments in connection with research and development may include VAT.

6.3 Calculation rules

No non-monetary values were made in 2025

7 Additional Information

N/A