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# PTC Therapeutics, Ltd (PTC): Methodological note for HCP/ORDM/HCO disclosure 2025

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PTC Therapeutics, Ltd (PTC) is committed to working in an open and transparent way with Healthcare Professionals (HCPs), other relevant decision makers (ORDMs) and Healthcare Organisations (HCOs), in order to better serve the needs of patients. Transparency is essential to building and maintaining trust in our organisation and the pharmaceutical industry. PTC is working in collaboration with the Association of the British Pharmaceutical Industry (ABPI) in order to make sure that we continue to set high standards of ethical interaction between PTC and HCPs/ORDMs/HCOs within the UK. This document provides the methodological narrative to support the submission of our UK ABPI Disclosure Report for the year 2025 to the Disclosure UK platform.

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# 1 Definitions

## 1.1 Recipients

### HCO

PTC align with the ABPI and defines a Healthcare Organisation (HCO) as a healthcare, medical or scientific association or organisation such as a hospital, clinic, foundation, university or other address, place of incorporation or primary place of operation is in Europe or an organisation through which one or more health professionals or other relevant decision makers 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.

### HCP

PTC align with the ABPI in our definition on Healthcare Professionals (HCPs), as members of the medical, dental, pharmacy and nursing professions and any other persons who in the course of their professional activities may administer, prescribe, purchase, recommend or supply a medicine. In relation to the annual disclosure of transfers of value (Clause 28), the term also includes any employee of a pharmaceutical company whose primary occupation is that of a practising health professional.

### ORDM

PTC align with the ABPI in our definition of Other Relevant Decision Maker (ODM) as including individuals 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.

Any queries raised by HCOs, HCPs or ORDMs will be investigated by the Regional Head, UK & Ireland, the UK Office Manager and Finance Business Partner to identify any discrepancies between what has

been reported by PTC and what is being claimed by the HCO, HCP or ORDM. Individual contracts, expense forms and payment details will be reviewed to either back up what has been declared by PTC or correct any mistake in reporting figures. Any action will be shared back to the requestor with appropriate data to back up the action taken. Any data found to be incorrect will be changed and updated prior to publication on the ABPI Portal.

PTC will continue to publish data relating to retired health professionals or other relevant decision makers and will endeavor to contact the individual first as part of the process of contacting individuals prior to disclosure. If this is not successful PTC will contact the retired individual's previous employer as part of the process of disclosure. Any requests to aggregate a retired individual's data will be reviewed in line with our Legitimate Interest process.

PTC will continue to publish data relating to deceased health professionals or other relevant decision makers and will contact the individual's previous employer as part of the process of contacting individuals prior to disclosure. Any requests to aggregate a deceased individual's data will be reviewed in line with our Legitimate Interest process.

## **1.2 Kind of ToVs**

### **Donations**

Donations are non-financial support 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 may be proactively offered and include goods, services or time (e.g. the secondment of company employees, use of company resources, training, books and computers) and can be provided to any type of organisation. Donations to individuals are prohibited.

The purpose of a Donation is to support various initiatives, projects or non-profit organisations. Donations can only be provided to non-profit certified organisations focusing on services to patients, caregivers, and the health and well-being of the general public. This may include non-profit hospitals and foundations, medical or professional associations, disease-based research, education or patient advocacy organisations and similar non-profit organisations. If the donation is to support a fundraising activity, that should be widely publicised and solicit contributions from numerous organisations.

### **Grants**

Grants are financial support 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 and must be based on unsolicited requests. Activities that could be considered for grant funding may include production costs for a health organisation's clinical treatment guidelines, running costs for an organisation's website, administration costs for a medical society or patient group, contribution towards hospital postgraduate education funds and contribution towards local practice nurse group education funds. Grants to individuals are prohibited.

The purpose of Educational Grants must be to support either (a) specific, independent professional educational programmes (accredited or non-accredited) where the grant recipient is responsible for developing the content and for managing the event or materials, or (b) institutional fellowship or scholarship programmes. Educational Grants must not interfere with the independence of grants recipients and their associates. PTC may not control the content of the programme or the faculty,

and the grant recipient controls the selection and invitation of any healthcare professionals. Fellowship or Scholarship Programmes must be open and competitive to relevant institutions or candidates in a given geographic or therapeutic area and widely communicated. The selection of subsidised fellow/scholarship holders must be solely within the discretion of the recipient receiving the grant and comply with applicable national laws, guidelines and professional codes of conduct. The purpose of educational grants may not be for general education funds. PTC may consider providing monetary support to other type of activities, for example: a) infrastructure grants to healthcare-related institutions that are in need of improving their medical infrastructure, provided the grant is enhancing patient care and it is not intended to cover the internal operating expenses of the recipient; b) grants to patients associations/organisations to increase disease awareness or to provide psycho-social support during and after diagnosis or treatment; c) grants to support advocacy or research activities regarding healthcare public policies and legislations.

### **Fees for service and consultancy**

PTC defines fees as any remuneration paid for services provided under an agreement and could include (but is not limited to) advisory boards, speaker engagements, medical writing, general consulting, development of educational materials etc.

### **Related expenses for fees for service and consultancy**

PTC defines related expenses as those claimed during delivery of said service or consultancy, e.g. accommodation, travel etc, but excluding meals and drinks.

### **Research & Development (R&D)**

Transfers of value relating to R&D are disclosed in aggregate. These may include payments to HCPs or HCOs related to the planning and conduct of non-clinical studies, clinical trials and prospective non-interventional studies.

### **Sponsorship**

A contribution towards an activity initiated by an independent organisation where PTC receives something in return. Sponsorship of an event may refer to the financial support given by PTC for the educational aspects of said event such as a sponsorship fee or the right to exhibit a stand. Sponsorship in this case will normally be with an HCO or third-party provider and will not be with an individual.

### **Support**

Support to attend third party medical education meetings refers to the support that PTC provides to HCPs or ORDMs to attend independent third-party medical education meetings. The contribution will be towards registration fees, accommodation and travel expenses. These are reviewed on a case by case basis. Support could be provided to an HCP or ORDM. ]

## **2 Disclosure's Scope**

### **2.1 Products concerned**

[PTC has included prescription only medicines (POMs) within this disclosure. PTC does not sell any other types of medicines in the UK.]

### **2.2 Company concerned**

[No company subsidiaries. ]

### **2.3 Excluded ToVs**

None apart from the following which are not transfers of value for the purposes of the Code:

- transfers of value that are solely related to OTC medicines
- ordinary course purchases and sales of medicines by and between a company and a health professional or a healthcare organisation
- samples of medicines provided in accordance with Clause 21
- transfers of value provided in accordance with Clauses 10.5, 10.6 and 19.2
- subsistence provided to health professionals and other relevant decision makers in accordance with Clause 10.1.

Note in relation to subsistence, if meals and drinks cannot be split from other transfers of value, the full amount will be allocated in the relevant disclosure category.

Any transfer of value to a Patient Organisation and member of the public including patients and journalists will be declared on PTC's UK website which can be accessed via a link in the relevant Disclosure UK gateway.

### **2.4 ToVs date**

For the purpose of the 2025 Disclosure, we have taken all payments made to UK HCPs, ORDMs or HCOs from 2 January 2025 to 31 December 2025 inclusive.

### **2.5 Direct ToVs**

Direct ToVs include sponsorship towards congress registration, accommodation and travel, contracted speaker services and advisory board attendance with related expenses (including travel and accommodation) and direct consulting services.

### **2.6 Indirect ToVs**

Not applicable.

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

During the period of this 2025 Disclosure, PTC has not provided any non-monetary transfer of value to UK HCPs, ORDM's or HCOs.

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

During 2025 there were no instances of partial attendance or any cancellations and therefore refunds.

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

All payments made to UK HCPs, ORDMs or HCOs from outside the UK are tracked and managed centrally by our Global team. All information is contained within our financial system outlining full payments made including travel and associated expenses. Contracts are also shared with the UK office containing full payment details for each engagement. The PTC Finance Team is able to track all external payments made to HCPs, ORDMs and HCOs within the UK.

### **2.10 R&D**

For the purpose of 2025 disclosure PTC have recorded all transfers of value made to HCPs or HCOs related to the planning and/or conduct of non-clinical studies, clinical trials and non-interventional studies carried out in the UK.

## 2.11 Voluntary disclosure

[Not applicable.]

# 3 Specific considerations

## 3.1 Country unique identifier

[Not applicable.]

## 3.2 Self-incorporated HCP

[Any HCPs contracting with their own Limited Company have been disclosed using their NHS principal practice role and institution name.]

## 3.3 Multi-year agreements

[Where multi-year agreements are in place, PTC report transfer of value against an individual in the year when payment was made to the individual.]

## 3.4 Country specificities

[Not applicable.]

## 3.5 Quality Checks

All transfer of value data collected during the period of disclosure are collated together in a source file by the Office Manager and then transferred to the mandatory disclosure template by the Regional Head, UK & Ireland. This template is then independently reviewed and approved by the Appropriately Qualified Person (AQP) and Medical Final Signatory cross-checking where necessary against the source file.

Prior to submitting the template to the ABPI Disclosure portal each individual HCP, ORDM and HCO is contacted by the Regional Head, UK & Ireland with details of their ToV figure, a reminder of the related activity and legal basis for processing and disclosing transfers of value data. At least one calendar week is given for review of the ToV and the opportunity to resolve any discrepancies. If a response is not received by the deadline, the ToV is submitted to the ABPI Disclosures portal.]

# 4 Data protection legal basis

## 4.1 Consent collection

[Effective from 10 February 2023 PTC transitioned from relying on written consent from HCPs and ORDMs to legitimate interests as the legal basis of processing and disclosing transfers of value data under the applicable data protection legislation (the EU General Data Protection Regulation, as supplemented in the UK by the UK Data Protection Act 2018).]

## 4.2 Legitimate interests

PTC believes that the publication of transfer of value data, particularly on a named basis, serves important legitimate interests because it serves to:

- protect and instil public confidence in the integrity of the relationship between the pharmaceutical industry and HCP/ORDMs;
- represent a step towards fostering greater transparency and building greater trust between the pharmaceutical industry, the medical community and society;
- enable PTC to most fully comply with its disclosure obligations, for instance under the Association of the British Pharmaceutical Industry (ABPI) Code of Practice.

To balance the legitimate interests described above against the interests, rights and freedoms of the relevant individual HCP/ORDMs, PTC provides HCP/ORDMs with information in the form of a signed agreement/contract about how and why their personal data will be processed and disclosed with specific instructions to contact [ukoffice@ptcbio.com](mailto:ukoffice@ptcbio.com) if they wish to exercise their right to object to disclosure on an identifiable basis.

During this 2025 Disclosure period, there was one individual who objected to payments being disclosed for reasons of personal safety. This request not to disclose was reviewed by PTC under due process and the request for data to be aggregated was upheld. Therefore, their payment for 2025 has been disclosed in aggregate.]

## 5 Form of disclosure

### 5.1 Date of publication

[12/03/2026]

### 5.2 Disclosure platform

[[Disclosure UK - www.disclosureuk.org.uk](http://www.disclosureuk.org.uk) ]

### 5.3 Disclosure language

[English,]

## 6 Disclosure financial data

### 6.1 Currency

[GBP.

Most payments made are in GBP, however some payments have been made in other currencies for example the Euro (EUR) (i.e. where another European country affiliate has paid for a UK HCP to speak at a symposium in their country, the contract and payment would be in EUR) or United States dollar (USD). Where a conference is in a country outside of Europe or the US any expenses incurred would normally be paid in GBP with an exchange rate applicable on the day the expense was incurred. With limited ability to track exact exchange rates on any given day of monetary transfer we have taken an average exchange rate for 2025 of £1 = 1.167 EUR, = 4.95 PLN, = 1.84 CAD and also = 1.32 USD and applied this to all EUR, PLN or USD payments made during 2025. This rate has been taken from yearly average rates from OFX.com accessed on 4 February 2026. (<https://www.ofx.com/en-gb/forex-news/historical-exchange-rates/yearly-average-rates/>).]

### 6.2 VAT included or excluded

**VAT**

Where an individual HCP, ORDM or HCO is VAT registered then transfers of value made to that HCP/ORDM/HCO by PTC will include VAT where appropriate. All other transfers of value are exclusive of VAT.

### **Tax**

All transfers of value made by PTC to HCPs, ORDMs or HCOs do not include the payment of any tax. It is made clear within the agreement/contract that the individual or organisation is liable for any and all taxes on payments made to them by PTC.]

### 6.3 Calculation rules

[Not applicable.]

## 7 Additional Information

[Not applicable.]