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Roche Products Ltd - Methodological note for HCP/ORDM/HCO disclosure 2025

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This note describes the methods used by Roche in the UK to meet its obligations and the requirements for disclosing payments and Transfers of Value (ToV) to Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs) and Healthcare Organisations (HCOs) as outlined in the EFPIA HCP/HCO Code of Practice and reflected in the ABPI Code of Practice for the Pharmaceutical Industry.

Transfers of Value made to Patient Organisations and Members of the Public including Patients and Journalists will continue to be disclosed separately on the Roche website www.roche.co.uk.

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1 Definitions

1.1 Recipients

1.1.1 Healthcare Professional (HCP) *

The term 'healthcare professional' includes members of the medical, dental, pharmacy and nursing professions and any other persons who, during their professional activities, may administer, prescribe, purchase, recommend or supply a medicine.

1.1.2 Other Relevant Decision Maker (ORDM) *

The term 'other relevant decision maker' particularly someone 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 is not a health professional.

1.1.3 Healthcare Organisation (HCO)

The term 'healthcare organisation' means either a healthcare, medical or scientific association or organisation such as 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 the UK, or an organisation through which one or more health professionals or other relevant decision makers provide services.

1.1.4 Professional Congress Organisers (PCO)

The term 'professional congress organiser' is a third-party entity engaged to manage events involving (congress, symposia, meetings) on behalf of a pharmaceutical company or HCO.

* ToVs for retired individuals are evaluated case-by-case. Disclosure is determined by the recipient's professional status (e.g., GMC registration) at the point of engagement and the specific nature of the services provided, ensuring alignment with reporting obligations at the time of the activity.

1.2 Kind of ToVs

1.2.1 Categories disclosed against individual HCPs/ORDMs

Contracted service fees and associated expenses	Roche pays fair market value fees for the provision of services provided by HCPs/ORDMs. These types of services may include, but are not limited to: chairing or speaking at meetings, providing training services, writing and/or reviewing materials and providing advice such as participating in advisory boards and market research. Associated expenses may include, but not be limited to: travel, accommodation, parking and registration fees. This service provision is documented and agreed via a consultancy agreement and the fees and associated expenses documented in the agreements are disclosed.
Contribution to cost of events, including registration fees, travel and accommodation	Roche may provide support for individual HCPs/ORDMs to attend appropriate medical educational meetings. All associated registration fees, accommodation rates and travel expenses are disclosed accordingly.

1.2.2 Categories disclosed against HCOs

Collaborative Working	Refers to pharmaceutical companies working with other organisations to deliver initiatives which either enhance patient care or are for the benefit of patients or alternatively benefit the National Health Service (NHS) and, as a minimum, maintain patient care. Joint Working is a type of Collaborative Working.
Contracted service fees and associated expenses	Roche pays fair market value fees for the provision of services provided by HCOs. These types of services may include, but are not limited to: chairing or speaking at meetings, providing training services, writing and/or reviewing materials and providing advice such as participating in advisory boards. When Roche engages with an HCO to provide the services of an HCP, any fee for service is paid directly to the HCO, however expenses claimed by the HCP will be reported against the individual.

Contribution to cost of events	This category includes ToV to HCOs, or third parties acting on their behalf, towards an activity managed by a third party for tangible benefits, such as an exhibition stand, in return. It may include direct funding such as sponsorship fees or the provision of indirect support such as paying for venue hire/catering directly to the service provider. In addition, ToV that is not specifically linked to an event/ meeting that do not fall under other defined categories are reported here. For example, Corporate Memberships provided to professional societies classified as HCOs.
Donations	Roche may provide physical items, services or benefits in kind to an HCO, for the purpose of supporting healthcare, scientific research or education, with no consequent obligation to the recipient organisation to provide goods or services in return. Donations are never provided to an individual.
Grants	Roche may provide funds in response to a request, for the purpose of supporting healthcare, scientific research or education, with no consequent obligation to the recipient organisation to provide goods or services in return. Grants are never paid to individual and only provided to HCOs when there is a clear arm's length arrangement in place.
devPatient support services or package deals	Roche may provide patients support services as part of a package deal, which may involve the delivery of services for patients. ToV for any part of the service delivered by an HCP is disclosed as fees for service.

1.2.3 Research and Development (R&D)

R&D	Research and development transfers of value' means, for the purposes of disclosure, transfers of value to health professionals or healthcare organisations related to the planning or conduct of: i. Non-clinical studies (as defined in the OECD Principles of 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.

2 Disclosure's Scope

2.1 Products concerned

Products include Prescription Only Medicines (PoM) and devices where these are linked specifically to the use of a Roche PoM.

2.2 Company concerned

Roche Products Ltd reports ToV on behalf of all company subsidiaries and affiliates

2.2.1 Co-promotion projects

Roche and Chugai Pharma UK Limited (Chugai) currently co-promote Prescription Only Medicines. For this and any other situation where Roche jointly markets a product with another pharmaceutical company, Roche will only declare those ToVs made directly by Roche. ToVs made by any co-marketing partner (including Chugai) will be disclosed separately by that organisation.

2.3 Excluded ToVs

As per Clause 1.25 of the ABPI Code, Roche do not report the following as ToV:

- 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.

2.4 ToVs date

All ToV made between 1 January and 31 December 2025.

A ToV is considered to be made when a direct payment is authorised in our finance system or an indirect benefit is received by the beneficiary. For example:

- If a contract is signed on 1 October 2024 but the payment is authorised on 15 January 2025, the disclosure will be treated as a 2025 ToV and disclosed to the ABPI by 31st March 2026 for publication by end of June 2026

- In the case of the provision of an indirect benefit e.g. Donation, accommodation and travel, the activity/attendance date will be classed as the date of the transfer of value

- In the case of a ToV captured in iHCP the attendance/ activity date will be classed as the date of the transfer of value.

2.5 Direct ToVs

May include:

- Contracted service fees and expenses

- Contribution to cost of events, including sponsorship paid to HCOs/ third parties managing events on their behalf; registration fees; travel and accommodation
- Collaborative Working (including Joint Working)
- Grants
- R&D

2.6 Indirect ToVs

May include:

- Contracted service associated expenses
- Contribution to cost of events, including sponsorship paid to HCOs/ third parties managing events on their behalf; registration fees; travel and accommodation
- Collaborative Working (including Joint Working)
- Donations
- R&D

2.7 Non-monetary ToVs

May include, but not limited to:

- Collaborative Working (including Joint Working) e.g. staff resource
- Donations e.g. software donations

Where a Roche employee is working on a project and is included in the calculation of value, this value is calculated based on their daily rate according to the average salary for the role.

2.8 ToVs in case of partial attendances or cancellation and refund

If a meeting was cancelled after an HCP/ORDM had already spent time preparing for the meeting then this preparation time would be reimbursed and hence disclosed.

Expenses already incurred and reimbursed for an event that is later cancelled (e.g. rail fare to attend a speaker meeting) will be disclosed.

2.9 Cross-border activities

Roche discloses ToV based on the HCP's country of practice. ToVs made by affiliates of Roche for interactions with HCPs/ ORDMs in a different country are captured in a Roche Group system (iHCP) and will be disclosed by the Roche affiliate responsible for reporting in the HCP's country of practice. If the HCP practices in more than one country, Roche will select one to be the primary country and disclose all ToV to him/her in that country.

2.10 R&D

Research and Development (R&D) ToVs are disclosed at an aggregate level (i.e. total spend with all involved HCPs/ ORDMs/ HCOs added together without specifying individuals or organisations who have been paid).

R&D includes:

- Pre-clinical research and clinical research, including Investigator Sponsored Research
- Non-interventional studies that are prospective in nature
- Advisory boards and consultancy services in relation to clinical research
- Real world data studies and Health Outcomes research
- Fees for service to HCPs, ORDMs and HCOs in relation to study sites (including where these fees have been made by CROs on behalf of Roche)
- Expenses such as travel and accommodation in relation to the above

R&D generally does not include:

- Overhead costs (including CRO fees)
- Materials (such as study medication, injection kits, testing etc.)
- Tests required by the study protocols e.g. blood tests, radiology/scans, ECGs etc.

2.11 Voluntary disclosure

Roche disclose in line with the requirements of the ABPI Code of Practice.

3 Specific considerations

3.1 Country unique identifier

Roche assign unique identifiers to HCPs/ORDMs/HCOs.

3.2 Self-incorporated HCP

Where an HCP/ORDM runs a private company (when they are the only employee of the corporation), where possible, ToV are reported against the individual.

Where an organisation is principally made up of a group of HCPs, but where the ToV cannot be reasonably ascribed to an individual HCP within the organisation, this organisation has been designated an HCO and the ToV disclosed accordingly.

3.3 Multi-year agreements

For any multi-year contracts, the ToV is disclosed by reference to the year the payment or benefit was authorised/provided to the HCP/ORDM/HCO.

3.4 Country specificities

In this reporting period Roche have not engaged in Collaborative Working initiatives or projects involving other pharmaceutical companies. Further information on Collaborative Working projects Roche is currently involved in can be found at www.roche.co.uk/partnerships.

3.5 Quality Checks

Roche conduct a robust internal review of data and do not perform an external validation exercise prior to data submission and ABPI pre-disclosure.

4 Data protection legal basis

4.1 Consent collection

In line with the requirements of applicable data protection laws and regulations (including the UK General Data Protection Regulation, where a transfer of value has been made to an individual HCP/ORDM by Roche, Roche will publicly disclose identifiable data in accordance with legitimate interests.

4.2 Legitimate interests

Roche believe that there is a clear benefit in disclosing the individual, identifiable data of HCPs/ORDMs who have received payment from Roche for their services, not only in terms of the ABPI Code and ABPI members driving transparency, but also for society and patients in understanding those interactions.

Individuals may choose to object to public disclosure by sending an email to uk.disclosure@roche.com stating the reasons for objection.

Roche will apply a balancing test and notify the individual whether or not the legitimate interests of Roche override their rights. If it is decided that Roche's legitimate interests prevail, their data will be disclosed to the wider public through the ABPI Disclosure portal. If the balancing test falls in favour of the individual, their data will be provided to the ABPI in an aggregated format without disclosing their identity.

Roche is not required to obtain consent from UK HCOs in order to make an identifiable HCO disclosure to the ABPI as the Data Protection Act applies to the protection of personal data only.

5 Form of disclosure

5.1 Date of publication
30/06/26

5.2 Disclosure platform
Disclosure UK – www.disclosureuk.org.uk

5.3 Disclosure language
English

6 Disclosure financial data

6.1 Currency
ToVs are disclosed in Roche's local currency (£GBP). Any ToV made by an affiliate of Roche in foreign currency is converted using a single annual exchange rate for each currency, as embedded into the Roche transparency reporting systems and based on the average rate of the previous year.

6.2 VAT included or excluded
In general, Roche defines ToV as "cost to Roche" and hence VAT is excluded from the reported ToVs.

Following the same principle, withholding taxes paid by Roche for ToVs provided to an HCP/ ORDM/ HCO would be included.

Two exceptions from the above rule exist:

- For indirect payments related to events, VAT is typically not recoverable for Roche and the company's systems do not capture VAT separately. In this instance the reported ToV will include VAT; and
- The same applies to actual cross-border spend captured in iHCP, for which no VAT is readily identifiable. In this instance, reported ToV will include VAT.]

6.3 Calculation rules
Roche calculate ToV based on the actual cost incurred by the company or, where appropriate, the representative value of the benefit received by the HCO.

7 Additional Information

7.1 Payments to charity

On occasion, a UK HCP/ ORDM who has provided a service to Roche may ask for their fee to be paid to a charity. Roche's policy does not allow this and Roche insists that all payments are made directly to the UK HCP/ ORDM concerned and hence classed as a ToV to the individual UK HCP/ ORDM concerned.]