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Rosemont Pharmaceuticals

Methodological note for HCP/ORDM/HCO disclosure 2025

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1 Definitions

1.1 Recipients

A *Healthcare Professional (HCP)* is any individual who, in the course of their professional activities, is authorised to prescribe, recommend, purchase, supply, or administer medicinal products. In 2025, Rosemont engaged with two HCPs, both of whom were Pharmacists.

A *Healthcare Organisation (HCO)* refers to any medical, scientific, or professional institution, association, or body whose primary purpose is to support medical education. Rosemont collaborates with HCOs that are aligned with our strategic and business objectives.

1.2 Kind of ToVs

The following clarification on definitions relates only to the types of ToVs that Rosemont has engaged with during 2025.

Sponsorship Agreements

Rosemont gives contributions, through financial support to legitimate, established organisations for medical or scientific education of external stakeholders, organising or hosting educational events. These contributions aim to increase the educational quality of the event and/or support with logistics in appropriate venues or with incidental hospitality, in line with Rosemont's own ethical principles. Rosemont maintains details of the sponsorship agreements which describe the purpose of the sponsorship and for what the funds are to be used. Due diligence is completed for each sponsorship package and sponsored event. Sponsorship packages may also include a range of associated outputs linked to the educational activity. These may include satellite symposia, sponsored sessions, exhibition or stand space, digital or printed materials, event websites, post-event communications, or inclusion within membership magazines, website or similar professional publications. Where appropriate, such outputs may include factual, balanced information relating to Rosemont products or services, provided this is relevant to the audience, proportionate, and compliant with applicable codes of practice and internal governance requirements.

Sponsorship packages may also include the sponsoring of speakers or faculty. In such cases, Rosemont will disclose the total sponsorship amount provided to these organisations and not the individual payment to speakers. Transfers of Value are made to either the HCO directly or to an event organiser or other third party appointed by the HCO to manage the event. In all cases, Transfers of Value are disclosed against the HCO that ultimately benefits.

Registration fees

As part of support for continuous medical education, Rosemont provides support to HCPs to cover the costs of registration fees to attend selected educational events or congresses.

Where these are provided to individual HCPs, the purpose of the support is to enable delegates to attend presentations or participate in educational meetings where there is relevance to patients which Rosemont products support.

All arrangements are generally paid directly to the event organiser but will be disclosed against the individual HCP attending.

Where registration fees are paid to HCOs for event attendance, this may also include occasions where Rosemont employees are supported to attend the event. In such cases, the registration fees are paid directly to the HCO or event organiser for the participation of Rosemont staff, and these payments are disclosed against the relevant HCO as per standard practice.

Fees for service and consultancy and related expenses

Rosemont engages an HCP/HCO for services when there is a genuine and legitimate business need and where the HCP/HCO is qualified and appropriate to provide the services. These services are paid with a Fee for Service at Fair Market Value.

These services can include among others:

- Speaking at and chairing meetings
- Training services
- Participation at advisory board meetings
- Development of education materials
- General consulting/advising
- Participation in market research where such participation involves remuneration and/or travel. Payments for these services are only disclosed if Rosemont is aware of the identity of those participating in the market research.
- Provision of product information through membership publications

As part of the written Fee for Services Agreement, related expenses can be paid for and can include costs of travel. All costs are paid by Rosemont to travel and or /accommodation providers or meeting organisers (where relevant) or reimbursed supported by appropriate receipts.

Where payments for HCP "Fee For Service Agreement" are with HCOs, these transfers of value payment will be disclosed against the institution or organization.

2 Disclosure's Scope

2.1 Products concerned

Rosemont develops, manufactures and supplies prescription only medicines to the UK market. Interactions with HCPs/HCOs are focused on the development and promotion of prescription medicines. Consequently, only ToVs relating to prescription medicines are being disclosed.

2.2 Company concerned

No applicable to Rosemont in 2025.

2.3 Excluded ToVs

Where refreshments form an integral and inseparable component of event-related costs or sponsorship provided under Sponsorship Agreements with HCOs, they have been included within the Contributions to Cost of Events.

2.4 ToVs date

Where a ToV involves a payment, the amount is reported in the year the payment is made (between 01 January and 31 December). A ToV is disclosed once the transfer is considered complete, for example when the full payment has been made or the associated benefit has been fully received.

2.5 Direct ToVs

The natural or legal person who holds the bank account to which the payment is made is considered the recipient of the ToV and will be disclosed accordingly. However, if an HCP has requested that payment under a fee-for-service agreement be made to a company for which they are the sole shareholder, the ToV will be recorded against the individual HCP rather than the company.

2.6 Indirect ToVs

Where ToVs are provided to an individual HCP indirectly via an HCO, and Rosemont has obtained the necessary consent, these ToVs will be disclosed against the individual HCP in accordance with guidelines.

2.7 Non-monetary ToVs

Rosemont did not engage in any non-monetary ToVs during 2025.

2.8 ToVs in case of partial attendances or cancellation and refund

[Not applicable to Rosemont in 2025]

2.9 Cross-border activities

Not applicable to Rosemont in 2025

2.10 R&D

Not applicable to Rosemont in 2025

2.11 Voluntary disclosure

All Transfers of Value (ToVs) made to Healthcare Professionals and Healthcare Organisations have been fully disclosed.

3 Specific considerations

3.1 Country unique identifier

Rosemont have not used country unique identifier

3.2 Self-incorporated HCP

As noted above, where an HCP has established their own company and is its sole owner, and Rosemont makes payments to that company for services provided by the HCP, the corresponding Transfers of Value are disclosed against the individual HCP rather than the company.

3.3 Multi-year agreements

Not applicable to Rosemont in 2025

3.4 Country specificities

Not applicable to Rosemont in 2025

3.5 Quality Checks

The disclosure was prepared by the Category Manager through analysis of the 2025 records and subsequently reviewed by the Marketing Assistant to ensure consistency and completeness. The template and Methodological Note have been approved and certified through our standard material approval process.

Rosemont aims to ensure that the data included in the disclosure report is complete to the best of our knowledge. Rosemont keeps its disclosure data under review and will amend and/or update its disclosure data if/and when it becomes aware that its quality and accuracy could be improved.

4 Data protection legal basis

4.1 Consent collection

All efforts have been made to achieve a high level of individual HCP payment disclosure whilst recognising the UK Data Act and the General Data Protection Regulation (GDPR). Consent has been obtained for all HCPs included in the 2025 disclosure. Rosemont

engages exclusively with Healthcare Professionals who are willing to provide consent for disclosure.

UK HCOs are reported without the need for consent as they are legal entities.

4.2 Legitimate interests

Not applicable to Rosemont in 2025.

5 Form of disclosure

5.1 Date of publication

The date of publication for United Kingdom of Great Britain & Northern Ireland is 30 June 2024 in line with the ABPI Code of Practice for the Pharmaceutical Industry

5.2 Disclosure platform

Disclosure UK – www.disclosureuk.org.uk

5.3 Disclosure language

Disclosure is made English

6 Disclosure financial data

6.1 Currency

Disclosure will be made in British Pounds.

6.2 VAT included or excluded

VAT is not included in the ToVs included in this report.

6.3 Calculation rules

Not applicable to Rosemont in 2025.

7 Additional Information

During 2025, Rosemont implemented a new Fair Market Value (FMV) calculator to further strengthen the consistency and compliance of our HCP engagement processes. The updated tool establishes a structured, evidence-based approach for determining appropriate remuneration, ensuring alignment with industry standards and internal governance requirements. Its introduction has enhanced transparency, supported robust decision-making, and ensured that all payments reflect legitimate services provided while upholding Rosemont's commitment to ethical interactions with Healthcare Professionals.]