

# [Angelini Pharma UK-I]: Methodological note for HCP/ORDM/HCO disclosure 2025

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[Introduction:

Angelini Pharma UK-I, a company of Angelini Pharma Group is a modern group, projected into the future and always proud of the values that are at the basis of its corporate philosophy.

Angelini Pharma acts with Integrity, Trust, Respect and Transparency as per its core behaviours and it collaborates with various stakeholders including Healthcare Professionals (HCPs), Healthcare Organisations (HCOs), Patient Organisations (POs), Other Relevant Decision Makers (ORDMs), patients and journalists on a range of activities in the interest of patients.

Our full commitment to the highest ethics and integrity standards is a cornerstone of our values and our actions; transparency and openness of the interactions with stakeholders is one of the key Angelini core behaviour, leading our way of conducting ourselves and our business.

Angelini Pharma UK-I is committed to ensure that Transparency is respected, demonstrating the integrity of our relationship with different stakeholders. These requirements extend to contracted services provided by the public including patients and journalists.

Angelini Pharma UK-I is accountable for compliance with local laws, regulations and industry codes in accordance with the Association of the British Pharmaceutical Industry (ABPI) Code of Practice, Irish Pharmaceutical Healthcare Association (IPHA) and Transfers of Value (ToV) tracking and disclosure, with the support of Global Compliance.

ToVs made by Angelini Pharma UK-I, including ToVs made by Arvelle Therapeutics - a company of Angelini Pharma Group - and by other Affiliates of the Angelini Pharma Group to HCPs/HCOs, whose principal address is in United Kingdom are published on the ABPI and IPHA Platforms and the report remains in the public domain for a minimum of 3 years after the time such information is first disclosed.

This methodological note describes the key aspects and clarifications on the nature of the Transfers of Value included in the disclosure.

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# 1 Definitions

## 1.1 Recipients

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Healthcare Professional (HCP)

The term 'healthcare professional' includes 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.

#### Healthcare Organisation (HCO)

The term 'healthcare organisation' means 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 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.

#### Other Relevant Decision Maker (ORDM)

The term 'other relevant decision makers' particularly includes those 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.

#### Professional Conference Organisers (PCO)

A company/individual specialized in the organization and management of congresses, conferences, seminars and similar events (all "Events"). Commercial companies involved in organisation of travel (travel agencies) or accommodation (hotels, banqueting functions in hotels, etc.) are not considered PCOs.]

## **1.2 Kind of ToVs**

### [Donations and Grants

Funds (grants), assets, or services (donations) freely given to HCOs 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 the donor in return.

Examples include:

- Donations and grants
- Independent investigator trials IIT (no-profit studies)

### Contribution to Cost of Events

Sponsorship agreements with HCOs or with Third Parties (PCOs) to manage an Event. Examples include:

- Rental of booths
- Advertisement (in paper, electronic or other format)
- Sponsoring of speakers/faculty]
- Registration fees paid for HCP/HCOs to attend events
- Travel (e.g., flight, train, taxi, car hires, tolls, mileage reimbursement, parking)

- Accommodation

### Fee for services and consultancy

ToVs resulting from or related to contracts between the Company and HCOs / HCPs under which such HCOs / HCPs provide any type of services to the Company or any other type of funding not covered in the previous categories.

Examples include:

- Speaker fees
- Post-marketing surveillance studies
- Retrospective Non Interventional Studies
- Development of education materials
- General consulting / advising

ToVs relating to expenses agreed in the written agreement for consultancy / professional service, including:

- Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking)
- Accommodation

## **2 Disclosure's Scope**

### **2.1 Products concerned**

[Angelini Pharma UK-I documents and discloses Transfers of Value that are related to prescription-only medicines and that are made, directly or indirectly, to or for the benefit of a Recipient.]

### **2.2 Company concerned**

[Angelini Pharma UK-I]

### **2.3 Excluded ToVs**

[Excluded ToVs include:

- Transfers of value that are solely related to over the counter (OTC) medicines or medical devices.
- Costs of meals & drinks are excluded. However, where meals and drinks make up an integral and inseparable part of contributions to the cost of events or sponsoring as part of Sponsorship Agreements, they have been included in Contributions to Cost of Events.
- Items of medical utility for HCPs, informational and educational material and samples are not disclosed.
- Group Calls]

## **2.4 ToVs date**

[The report discloses ToVs according to cash principle; following some details:

- Where the ToV is a payment values are reported on the date of payment
- Where the ToV is a benefit in kind, values are reported on the date the recipient received the benefit.]

## **2.5 Direct ToVs**

[The direct transfers are those carried out directly by Angelini Pharma for the benefit of the recipient.]

## **2.6 Indirect ToVs**

[The indirect transfers are those carried out on behalf of Angelini Pharma by a third party. When ToV are made through a “Third party”, necessary arrangements have been made with third parties to ensure the obligations are fulfilled (Third parties representing Angelini Pharma or acting on behalf of Angelini Pharma, provide Angelini Pharma with a detailed tracker of the ToV made to HCPs and HCOs).]

## **2.7 Non-monetary ToVs**

[No non-monetary TOVs were provided in 2025.]

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

[Where a service provider does not receive the benefit due to a “no show” (e.g. occurring when a HCP fails to attend a meeting they were supposed to), the associated costs are not reported, such as the cost of cancelling a hotel booking or accommodation. In case of partial attendance, only the benefits received are disclosed. In case of cancellation of an Event, possible penalties for annulling a confirmed arrangement or order and cancellation fees are not disclosed.]

## **2.9 Cross-border activities**

[Angelini Pharma UK-I report includes also ToVs of service providers whose address of principal practice and to HCOs and POs whose address of registration is UK made by any other Angelini Pharma Country]

## **2.10 R&D**

[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° 536/201412); or (iii) non-interventional studies that are prospective in nature, including relevant ToVs, e.g. for Investigator meetings.]

### **2.11 Voluntary disclosure**

[Nothing extra is disclosed beyond that which is required in the ABPI Code of Practice.]

## **3 Specific considerations**

### **3.1 Country unique identifier**

[Not applicable]

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

[Payments are made to both the personal accounts of HCPs and also company accounts.]

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

[Where contracts are valid for more than one year, only ToVs made in the reporting period are captured and disclosed.]

### **3.4 Country specificities**

[Not applicable]

### **3.5 Quality Checks**

[Not applicable]

## **4 Data protection legal basis**

### **4.1 Consent collection**

[Consent is collected from HCPs prior to events and activities taking place and during the contracting process. Consent is collected either via electronic signature or hand-written signature. HCPs have the right to withdraw consent at any time.]

### **4.2 Legitimate interests**

[Angelini Pharma UK-I do not process data using the 'legitimate interests' model. HCPs have the right to object to disclosure.]

## **5 Form of disclosure**

### **5.1 Date of publication**

[10<sup>th</sup> March 2026]

## **5.2 Disclosure platform**

[All HCP and HCO disclosures will be on the relevant ABPI Disclosure Platform. Payments made to Patient Organisations, Patients and Members of the Public can be found on the UK company website.]

## **5.3 Disclosure language**

[English]

# **6 Disclosure financial data**

## **6.1 Currency**

[The currency of the amounts disclosed in the report is the currency of the country where the disclosure is made, even if the payment of the ToV has been made in a different currency. In the case where ToV has been made in a different currency, the value is converted in local currency on the date payment was made or on the last day of the month, based on an online currency converter]

## **6.2 VAT included or excluded**

[All transactions are reported in the net amount excluding the VAT and including the withholding tax (if any).]

## **6.3 Calculation rules**

[No benefits in kind were provided in 2025. Therefore, this section is unapplicable.]

# **7 Additional Information**

[ADD detail]