

Orphalan UK

Methodological note for HCP/ORDM/HCO/PO disclosure 2025

Data year: 2025

Year of publication: 2026

The interaction between the pharmaceutical industry and healthcare professionals (HCP), healthcare organisations (HCO) and patient organisations (PO) is important for the improvement of patient care through the exchange of knowledge and experience. Orphalan (“Orphalan”) is committed to ensuring any interactions meet the high standards of professionalism, integrity and transparency that are expected.

Orphalan markets Prescription Only medicines and complies with the obligation to identify, collate and disclose transfers of value to healthcare professionals, healthcare organisations and patient organisations in accordance with the ABPI Code of Practice requirements. The ABPI Code incorporates the EFPIA Code on Disclosure of Transfers of Value From Pharmaceutical Companies to Healthcare Professionals and Healthcare Organizations (EFPIA Disclosure Code). For further information on these codes please visit <http://transpar-ency.efpia.eu> or <https://www.abpi.org.uk>

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1 Definitions

1.1 Recipients

Recipients include Healthcare Professionals/Other Relevant Decision Makers, Healthcare Organisations and Patient Organisations.

1.2 Kind of ToVs

For Orphalan’s disclosures, we applied the standards found in the ABPI Code for all applicable Categories of Disclosure including, but not limited to, “Collaborative Working,” “Donations and Grants to HCOs,” “Contribution to costs of Events,” and “Contracted Services.”

2 Disclosure’s Scope

2.1 Products concerned

Orphalan markets Prescription Only Medicines

2.2 Company concerned

Orphalan will issue one disclosure report for each country showing all ToV made to HCPs, HCOs, and ORDMs in that country, and each report will be published by the relevant Orphalan affiliate for that country in line with the regulations of the country.

Orphalan discloses ToV based upon the recipient HCP’s primary country of practice. If an HCP practices in more than one country, Orphalan will disclose all ToV to that HCP in the HCP’s primary country of practice.

2.3 Excluded ToVs

N/A

2.4 ToVs date

The disclosure report includes all ToVs to recipients during the reporting period between 01 January 2025 and 31 December 2025. ToVs for which relevant data becomes available after the cut-off date on 31 December 2025 will be included in the following disclosure report.

For multi-year contracts or contracts covering multiple ToVs, each individual ToV will be disclosed according to the reporting period in which it was received.

2.5 Direct ToVs

Direct TOVs are those made directly by a company for the benefit of a Recipient.

These include Contracted Services (Advisory Boards, Speaker engagements, general consulting/advising, assistance with training, travel, accommodation and other expenses incurred during delivery of contracted services), Contribution to costs of Events (Sponsorship, registration fees, travel and accommodation) and Grants.

2.6 Indirect ToVs

An indirect transfer of value is one made by a third party on behalf of a company for the benefit of a recipient where the identity of the company is known to, or can be identified by, the recipient.

These include Sponsorship agreements with HCOs / third party organisations appointed by HCOs to manage an Event.

2.7 Non-monetary ToVs

N/A

2.8 ToVs in case of partial attendances or cancellation and refund

If an invited Beneficiary does not come to such event, any payments made on the date of the event will not be included as a ToV to the Beneficiary who did not attend.

If an event is cancelled, cancellation fees are not included in transparency declarations.

2.9 Cross-border activities

Orphalan discloses ToV based upon the recipient HCP's primary country of practice. If an HCP practices in more than one country, Orphalan will disclose all ToV to that HCP in the HCP's primary country of practice. This data includes ToV made by all Orphalan affiliates.

2.10 R&D

N/A

2.11 Voluntary disclosure

N/A

3 Specific considerations

3.1 Country unique identifier

Companies disclosing in the UK cannot submit professional identifiers (e.g. GMC number) to Disclosure UK. Data submitted is validated and matched on Disclosure UK.

3.2 Self-incorporated HCP

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.

3.3 Multi-year agreements

N/A for 2025 disclosures

3.4 Country specificities

N/A

3.5 Quality Checks

Orphalan records all ToV and payments on a centralised shared system.

Contracts/Agreements and payments are cross-checked with on our finance system prior to disclosure. These checks are validated across commercial, medical and global functions.

4 Data protection legal basis

4.1 Consent collection

With respect to the collection and processing of HCPs' personal data, Orphalan complies with all applicable data protection regulations. Orphalan requires consent from HCPs prior to disclosing their personal data, including details of any ToV paid by Orphalan. For ToV in which Orphalan is unable to disclose on an individual basis for legal reasons, including compliance with data protection requirements, Orphalan will disclose on an aggregate basis. HCPs have the right to withdraw their consent at any time. In such cases, any ToV to these individuals will be disclosed on an aggregate basis.

4.2 Legitimate interests

N/A

5 Form of disclosure

5.1 Date of publication

March 2026

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 United Kingdom Sterling GBP and are rounded up to the nearest single pound. ToVs in foreign currencies are converted into Sterling using the appropriate currency conversion rate, calculated at the time the ToV was made, which may be different to the time it was utilised.

6.2 VAT included or excluded

Orphalan discloses the ToV at gross or net value depending on the underlying invoice. VAT is applicable where VAT has been paid. The ToV will be calculated based on the actual amount received by the recipient, either in kind or in cash.

6.3 Calculation rules

See above

7 Additional Information