

# Immedica Pharma UK Ltd Methodological Notes for Disclosure 2025

## Background

Immedica Pharma are committed to working transparently with Health Care Professional’s (HCP) and organisations. We believe they should be fairly compensated for the services they provide to pharmaceutical companies. The EPFIA Disclosure Code and the Association of British Pharmaceutical Industry (ABPI) code of practice provides accuracy and transparency in disclosing the scope and value of such collaborative work. Immedica Pharma has robust processes for engaging with HCP’s and Healthcare Organisations (HCOs). All engagements are planned in accordance with The ABPI Codes of Practice. The ABPI Codes of Practice require Immedica Pharma to disclose specific ToV to HCPs and HCOs. This requires companies to document and publicly disclose ToV made directly or indirectly to HCPs and HCOs. Companies must also publish a note summarising the methodology used for disclosures which also highlights each category of ToV.

This document sets out the methodology used by Immedica Pharma UK Ltd in the UK for recording ToV in 2025.

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**Definition**

**1.1 Recipients**

Definition of an HCP:

The term 'healthcare professional' includes members of the medical, 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. Disclosure will also apply to 'other relevant decision makers' (ORDMs), this 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.

Definition of an 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 Europe or an organisation through which one or more health professionals or ORDMs provide services.

ToV:

The term 'ToV' means a direct or indirect ToV, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development or sale of medicines. A direct ToV is one made directly by a company for the benefit of the recipient. An indirect ToV is one made by a third party on behalf of a company for the benefit of a recipient where the third party's identity is known to, or can be identified by, the company. An indirect ToV could also be the cost of travel or accommodation

incurred by the company in order for the HCP to complete work where the HCP has been contracted by the company (e.g. attending an advisory board meeting).

Fair Market Value (FMV):

Immedica Pharma usually compensate HCPs for their time when working with the company. The payment rate is determined by a process known as Fair Market Value (FMV). This is an industry-wide standardised calculation which tells the company what a HCP would actually earn for their time in practice, based on their specific credentials and qualifications. Immedica Pharma uses this information to ensure each HCP's compensation is fair and reasonable for the amount of time necessary to provide the requested service. The fee provided by Immedica Pharma is a calculation based on preparation, disturbance (travel) and actual time costs. All arrangements and payments require internal approval. An HCP may also decide not to be paid (e.g. altruistic reasons, own hospital rules for interactions with pharmaceutical companies, etc.)

## 1.2 Kind of TOV's

Contracted Services

HCP's, other relevant decision makers or their employers on their behalf, HCO's, patient organisations, individuals representing patient organisations, and members of the public, including patients and journalists, may be used as consultants and advisors, whether in groups or individually, for services such as speaking at and chairing meetings, involvement in medical/ scientific studies, clinical trials or training services, writing articles and /or publications, participation at advisory board meetings, and participation in market research where such participation may involve remuneration and /or hospitality. Examples of contracted services disclosed by Immedica Pharma include the following:

Meeting Sponsorship

Immedica sponsors a scientific or professional meeting, congress, conference, symposia, or other similar event arranged by or on behalf of healthcare organisation or a patient organisation.

Sponsorship for HCPs to Attend Educational Meetings

Immedica may provide support for individual HCPs or other ORDMs to attend events. Support in this context is the provision of a financial contribution, in whole or in part, whether paid directly or indirectly to individual health professionals or other relevant decision makers to attend events.

Related Expenses (Out-of-Pocket Costs)

Expenses reimbursed in connection with a contracted service (e.g., meals, taxis, parking) are always disclosed net of VAT.

Agreements

Immedica may engage HCP's to provide consultancy services in relation to a meeting such as a speaker at a symposium.

Advisory board agreements

Immedica wishes to engage an HCP or ORDM to serve as an advisor at a meeting.

Donation and grants

Donations and grants are funds, benefits-in-kind or services 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 and grants to individuals are prohibited.

Examples of donations and grants disclosed by Immedica Pharma include the following:

Grant Agreements

Grants are the provision of funds. Immedica is approached by independent companies to provide funding in relation to educational projects. These circumstances require that Immedica has no influence over the details of the project.

#### Donation Agreements

Donations provided by Immedica may include physical items, services or benefits-in-kind which may be offered or requested. Donations to HCOs are disclosed on the ABPI central portal.

Donations to patient organisations, public and patients including journalists are disclosed on the company website.

#### Market research

Payments made to consultants in relation to market research where the identify of those participants is known to Immedica Pharma

## **2. Disclosure Scope**

### **2.1 Products concerned**

#### Prescription only Medicines (POM)

A POM requires a valid prescription from an authorised health professional, such as a doctor or pharmacist, and must be dispensed by a pharmacy or licensed provider. The MHRA classifies medicines as POM in the UK when professional oversight is necessary for their safe use.

#### Over the counter Medicines (OTC)

OTC medicines can be bought without a prescription at pharmacies, supermarkets, and other stores. They treat minor issues like headaches, colds, or mild skin problems. Regulatory agencies evaluate their safety and effectiveness for non-prescription use.

### **2.2 Company concerned**

Immedica Pharma UK Ltd which is an affiliate of Immedica pharma AB.

### **2.3 Excluded TOV's**

All required ToVs are disclosed and none are omitted

### **2.4 TOV's Date**

Immedica Pharma UK has disclosed ToV that were made to UK HCO's, HCP's and ORDMs during the period 1st January 2025 and 31st December 2025. Where a UK HCP or ORDM was contracted prior to 2025, but actually received their ToV in 2025, the 2025 Disclosure report includes these Transfers of Value.

### **2.5 Direct TOV's**

A Direct ToVs is any monetary or non-monetary benefit that Immedica provides directly to an identifiable HCP or HCO without the involvement of an intermediary.

The value is transferred straight from Immedica to the recipient, and Immedica determines the purpose, amount, and nature of the benefit.

Direct TOVs include both financial payments and in-kind support, provided they are delivered directly to the HCP/HCO.

Immedica records and discloses the following categories of direct TOVs:

Fees for Service / Consultancy

Direct payments made to HCPs or HCOs for contracted activities, including:

- Advisory boards
- Speaking engagements
- Consultancy services
- Expert input or panel participation

Travel and accommodation arranged or paid directly by Immedica for identifiable HCPs in connection with:

- Scientific congresses
- Educational meetings
- Advisory boards
- Company-organised events

Registration Fees

- Conference or meeting registration fees paid directly by Immedica to the event organiser for a named HCP.

Grants, Donations, and Sponsorships to HCOs. Financial or in-kind support provided directly to an HCO, including:

- Educational grants
- Medical or scientific sponsorships
- Organisational support

Direct Reimbursement of Expenses. Reimbursement of costs incurred by an HCP or HCO for legitimate, contracted activities, such as:

- Travel
- Accommodation
- Subsistence
- Other approved expenses

Direct Non-Monetary Support. In-kind benefits provided directly to HCPs or HCOs, such as:

- Educational materials
- Training resources
- Event support services
- Access to digital or educational platforms

## 2.6 Indirect TOV's

The benefit is provided to HCPs or HCOs via a third party, rather than directly from Immedica to the final recipient.

These TOV's occur when Immedica funds or supports an activity through an intermediary such as an event organiser, medical communications agency, logistics provider, or professional conference organiser and the value is subsequently passed on to an identifiable HCP or HCO.

Indirect TOV's Recognised by Immedica

Third-Party Sponsored Attendance at Events

When Immedica provides funding to a third party (e.g. conference organiser, medical society, PCO) and that organisation uses the funds to support named HCPs for:

- Registration fees
- Travel
- Accommodation
- Subsistence

Agency-Managed Fees for Service. When Immedica contracts an agency to manage HCP engagement and the agency pays the HCP on Immedica's behalf, including:

- Speaker fees
- Advisory board honoraria
- Consultancy fees
- Chairing or panel participation fees

Educational Grants or Sponsorships with Identifiable Beneficiaries. When Immedica provides a grant or sponsorship to an HCO or third party and part of the funding is used to support specific, identifiable HCPs or HCOs, such as:

- Named delegate attendance
- Specific training programmes
- Educational packages for identifiable recipients
- Third-Party Logistics or Event Support

When Immedica funds a third party to deliver services that benefit identifiable HCPs/HCOs, including:

- Travel agencies arranging travel for named HCPs
- Event organisers booking accommodation for specific participants
- Third-party vendors providing materials or support to identifiable HCOs

Indirect Research-Related Support (Non-R&D Category) Where a third party distributes value to identifiable HCPs / HCOs outside the aggregated R&D category, such as:

- Payments to investigators routed through CROs
- Site-specific support delivered via a third-party vendor

## **2.7 Non monetary TOV's**

Non-monetary TOVs represent in-kind support, where Immedica covers or provides something of value rather than transferring money to the recipient.

Immedica typically classifies the following as non-monetary TOVs:

Travel and Accommodation. When Immedica books or pays for travel or hotel arrangements on behalf of an HCP or HCO for:

- Scientific meetings
- Advisory boards
- Educational events
- Company-organised activities

Registration Fees.

- Payment of conference or meeting registration fees directly to the organiser on behalf of a named HCP.

Subsistence provided in connection with a legitimate scientific or educational meeting, where permitted under the ABPI Code.

- Meals, refreshments,

- hospitality

In-Kind Support to HCOs. Non-financial contributions such as:

- Educational materials
- Training resources
- Access to digital platforms or tools
- Support services provided through third-party vendors

Logistics or Event Support. When Immedica arranges and pays for services such as:

- The Venue hire for an HCO meeting
- Technical support for virtual or hybrid events
- Third-party coordination for identifiable HCPs

Non-Financial Consultancy Support. Provision of items or services needed for an HCP to deliver contracted work, such as:

- Slide-deck development support
- Medical writing assistance
- Translation services

(Where these services are provided *to* the HCP rather than *by* the HCP.)

#### **2.8 TOV's in terms of partial attendance or cancellations or refunds.**

Immedica Pharma records ToVs based on the final cost incurred by the company. Where an HCP partially attends an event or service, only the proportion of costs that remain chargeable to Immedica Pharma after any adjustments or refunds is disclosed. If an activity is cancelled and a full refund is received, no ToVs is reported. If a partial refund is issued, only the net amount retained by the provider and ultimately paid by Immedica Pharma is disclosed. All adjustments are reflected in the disclosure for the year in which the final financial transaction is completed.

#### **2.9 Cross boarder activities**

Immedica Pharma records and discloses ToVs based on the country in which the HCP or HCO primarily practices, regardless of where the activity is organised, delivered or paid from. Cross-border engagements are captured through internal finance and compliance processes to ensure that all relevant ToVs are reported in the correct national disclosure (UK). Payments made by other Immedica affiliates to UK based recipients are included in the respective local disclosure, and VAT is excluded from all reported values.

#### **2.10 R&D**

All payments to a HCP, HCO and patient organisations relating to research and development are disclosed as aggregate figures in accordance with local Codes of Practice. These may include, Pre-clinical research and clinical research (includes Investigator Sponsored Research (ISR)), Non-interventional Studies, Advisory Boards and consultancy services in relation to clinical research, Real world data studies and Health Outcomes research.

#### **2.11 Voluntary disclosures**

Immedica Pharma may voluntarily disclose certain ToV that fall outside mandatory ABPI or IPHA reporting requirements where doing so supports transparency and aligns with industry best practice. Any voluntary disclosures are clearly identified within the published data and follow the same principles of accuracy, completeness and categorisation as mandatory disclosures.

### **3. Specific Considerations**

### **3.1 country unique identifier**

Immedica Pharma UK Ltd does not use a country-specific unique identifier for HCP or HCO disclosure. Individuals and organisations are identified using their full legal name and relevant address details, in line with ABPI requirements. No additional national identifier is applied.

### **3.2 Self incorporated HCPs**

Immedica Pharma UK Ltd may engage HCP's who invoice through their own limited companies. Where the service is delivered by an individual HCP and the company is used only as an invoicing vehicle, the ToV is disclosed against the individual. Where services are provided by a company as an organisation, the ToV is disclosed under the HCO category. This classification is confirmed during supplier onboarding and contracting. VAT is excluded from all disclosures.

### **3.3 Multi-year contracts**

Immedica will not engage in multi-year contracts

### **3.4 Country Specificities**

Where Immedica Pharma jointly markets a product with another pharmaceutical company, Immedica Pharma will only declare those payments made directly from Immedica Pharma. Immedica Pharma endeavours to make all of its ToV through bank accounts. These transactions are listed and kept as part of the normal business operation and used to support the ToV Disclosure preparation. ToV made by its co-marketing partners will be disclosed separately by those organisations.

ToV were initially registered in the currency paid by Immedica Pharma UK. Immedica uses the exchange rate at the time of payment.

### **3.5 Quality checks**

The completed disclosure and contract tracker was subject to review and sign off by the UK's General Manager, finally signed off by Immedica Pharma UK Medical Director and data was then entered onto the ABPI approved spreadsheet.

All disclosures of ToV during this timeframe are disclosed individually when there is a legal basis to allow it (e.g. individual consent have been obtained), otherwise they are disclosed in aggregated form.

Submission to ABPI: The completed ABPI spreadsheet from Immedica Pharma UK is submitted to the ABPI disclosures portal by 31st March 2026 @ 14.00hrs

## **4 Data protection legal basis**

### **4.1 Consent Collection**

HCO consent:

Immedica Pharma does not seek consent from HCOs for disclosure. In line with the ABPI Code in the UK, all ToV to HCOs are disclosed individually and in full, as consent is not required for organisational data. This approach is applied consistently across all HCO engagements

HCP consent:

Immedica Pharma UK Ltd records and manages consent for disclosure at the point of contracting and again prior to publication. 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). If an HCP withdraws consent, the individual's ToV remain included in the annual disclosure but are reported in an aggregated format, in line with ABPI requirements. The withdrawal is logged in our internal systems to ensure future disclosures reflect the updated consent status. Withdrawn consent does not affect the accuracy or completeness of the underlying financial data disclosed. All company emails have an opt out link included in the Signature.

#### **4.2 Legitimate Interests**

Immedica are looking at moving to Legitimate interest during 2026

### **5. Forms of disclosure**

#### **5.1 Date of Publication**

20.03.2026

#### **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 ToV were initially registered in the currency paid by Immedica Pharma UK. Immedica has uses the annual average exchange rates from the Bank of England at the time of disclosure submission. Moving forward Immedica will record the rates used at the time of payment.

#### **6.2 VAT included or excluded**

Immedica Pharma UK Ltd excludes VAT from all disclosed ToV. Where VAT is charged on an activity or service, only the net amount paid by Immedica Pharma is reported. This approach is applied consistently across all categories of disclosure and is aligned with IPHA and EFPIA requirements.

#### **6.3 Calculation rules**

Immedica Pharma calculates ToV using the final net amount paid by the company for each activity or service. VAT is excluded from all reported values. Where payments are made in a foreign currency, the amount is converted using the exchange rate applied in Immedica's financial systems at the time the transaction is processed. Any adjustments such as refunds, partial attendance, or cancellations are reflected in the final disclosed value. All calculations follow the principles of accuracy, consistency and alignment with ABPI/IPHA and EFPIA requirements.

### **7. Additional information**

Immedica Pharma has no additional country-specific or company-specific disclosure requirements beyond those described in this methodology. All ToVare reported in accordance with ABPI/IPHA and EFPIA guidance, and any clarifications needed to support accurate interpretation of the data have been included in the relevant sections above.

1. ToV were made to an HCP/ORDM directly or to a relevant organisation directly.
2. Immedica Pharma over the counter ToV are not applicable, hence this is not covered in this methodology.
3. Immedica Pharma medical device ToV are not applicable, hence this is not covered in this methodology.

### **Glossary of Terms**

ToV – Transfer of Value

EFPIA - European Federation of Pharmaceutical Industries and Associations

ABPI – Association of the British Pharmaceutical Industry

HCP – Healthcare Professional/Health Professional

IPHA - Irish Pharmaceutical Healthcare Association

ORDM – Other Relevant Decision Maker

HCO – Healthcare Organisation

FMV- Fair Market Value

TVT – ToV Tracker

### **References**

- EFPIA Code of Practice: [efpia-code-of-practice.pdf](#)
- 2024 ABPI Code of Practice for the Pharmaceutical Industry - Code of Practice for the Pharmaceutical Industry 2024

### **Contacts**

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