

IMMEDICA PHARMA POLSKA : Methodological note for disclosure of transfer of Value (ToV) to HCP/HCO 2025

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Collaboration between Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs) is fundamental to modern patient care and medical progress. HCPs and HCOs provide valuable expertise gained through practical experience in patient treatment and disease management. Immedica Pharma Polska recognises the importance of transparency in these relationships and therefore discloses Transfers of Value (ToVs) provided to HCPs, HCOs and Patient Advocacy Groups (PAGs).

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1 Definitions

1.1 Recipients

Recipients include:

- Healthcare Professionals (HCPs)
- Healthcare Organizations (HCOs)
- Patient Advocacy Groups (PAGs)

1.2 Kind of ToVs

Transfers of Value include:

- Registration fees
- Travel and accommodation expenses
- Fees for services and consultancy
- Related expenses connected with services
- Donations and grants to HCOs
- Sponsorship and event-related support

2 Disclosure's Scope

2.1 Products concerned

The disclosure covers activities related to medicinal products distributed in Poland by Immedica Pharma AB through Immedica Pharma Polska Sp. z o.o.

2.2 Company concerned

Immedica Pharma Polska Sp. z o.o. is the reporting entity responsible for the disclosure.

2.3 Excluded ToVs

Transfers of Value associated with Research & Development activities are not disclosed on an individual basis and are excluded from the categories described in this methodological note.

2.4 ToVs date

All disclosed values correspond to payments actually made and recorded during the reporting year.

2.5 Direct ToVs

Direct ToVs include payments made directly by Immedica Pharma Polska to recipients.

2.6 Indirect ToVs

Indirect ToVs include transfers provided through third parties acting on behalf of Immedica Pharma Polska where applicable.

2.7 Non-monetary ToVs

Non-monetary benefits are valued and disclosed according to their actual cost where they fall within disclosure requirements.

2.8 ToVs in case of partial attendances or cancellation and refund

Only values actually incurred, paid and recorded within the reporting year are disclosed.

2.9 Cross-border activities

Cross-border activities relating to Polish recipients are included where the transfer of value falls within the scope of Polish disclosure requirements.

2.10 R&D

Payments connected with Research and Development activities are not published individually.

2.11 Voluntary disclosure

In addition to HCPs and HCOs, Immedica Pharma Polska voluntarily discloses Transfers of Value provided to Patient Advocacy Groups (PAGs).

3 Specific considerations

3.1 Country unique identifier

Recipients are identified according to applicable Polish disclosure requirements and available recipient information. No specific national identifier is applied in the published methodology.

3.2 Self-incorporated HCP

Self-incorporated HCPs are classified according to the nature of the contractual relationship and applicable local regulations.

3.3 Multi-year agreements

Transfers under multi-year agreements are disclosed in the year in which the payment was actually made.

3.4 Country specificities

Disclosure of HCP transfers is:

- Individual where consent for publication of personal data has been obtained.
- Aggregated where consent has not been obtained, including the number and percentage of HCPs concerned.

3.5 Quality Checks

Published values are reconciled against actual payments made and recorded in company financial records for the reporting year.

4 Data protection legal basis

4.1 Consent collection

Individual disclosure of HCP data is based on consent for disclosure of personal data. If consent is not provided, transfers are disclosed in aggregate form.

4.2 Legitimate interests

Aggregated disclosure is applied when individual disclosure based on consent is not possible.

5 Form of disclosure

5.1 Date of publication

The disclosure is published annually following completion of the reporting year. The 2025 report and note were published on 14 October 2026.

5.2 Disclosure platform

<https://www.immedica.com/en/transparency>

5.3 Disclosure language

The disclosure is published in Poland and may be provided in Polish and/or English as required.

6 Disclosure financial data

6.1 Currency

All disclosed values are reported in Polish Zloty (PLN).

6.2 VAT included or excluded

Transfers of Value are disclosed gross, including VAT wherever applicable.

6.3 Calculation rules

Only payments actually transferred to recipients and recorded during the reporting year are included.

7 Additional Information

Disclosed categories include:

HCPs

- Registration fees
- Travel and accommodation
- Fees for services and consultancy
- Related expenses

HCOs

- Donations and grants
- Registration fees
- Travel and accommodation
- Sponsorship of meetings and congresses
- Exhibition and advertising space
- Fees for services and consultancy
- Related expenses

Abbreviations

- ToV = Transfer of Value
- HCP = Healthcare Professional
- HCO = Healthcare Organization
- PAG = Patient Advocacy Group
- FMV = Fair Market Value