

Methodological Note for Annual Disclosure of Transfer of Value
Theramex HQ UK Ltd
Reporting Period: 2024

Introduction

This methodology note outlines Theramex UK's approach to collecting, aggregating, and reporting disclosure data related to Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs), and Healthcare Organisations (HCOs).

It details Theramex HQ UK Ltd's position on the ABPI Code of Practice's annual Transfer of Value (ToV) disclosure requirements for 2024, which will be published on 27 June 2025

Definitions

Theramex adheres to the definitions provided in **Clause 1 of the 2024 ABPI Code of Practice** for:

- Healthcare Professional (HCP)
- Other Relevant Decision Makers (ORDM)
- Healthcare Organization (HCO)
- Transfer of Value (ToV)

Recipients

ToVs are disclosed for any HCO or HCP whose primary practice, main professional address, or place of incorporation is in the United Kingdom.

- If an HCO consists of a single HCP, the ToV is allocated to the individual HCP.
- If an HCP or ORDM does not attend an event or the event is canceled, only incurred ToVs that can be reasonably associated with the individual are attributed.
- If a flight or accommodation is booked but the event is canceled or not attended, no ToV is attributed to that individual.

Transfer of Value (ToV) Disclosure

ToV Recognition Date

- Direct ToVs are disclosed based on the payment date recorded in Theramex's financial systems and when the HCO/HCP receives the benefit.
- Indirect ToVs (e.g., travel and accommodation) are disclosed based on the event date.
- Multi-year agreements include only payments made within the relevant disclosure period.

ToV Value

- Disclosures reflect the actual cost incurred by Theramex, not the income or benefit received by the HCO/HCP.
- No non-monetary ToVs were made during the reporting period.

ToV Currency

- All ToVs are disclosed in Great British Pounds (GBP).
- Payments made in other currencies are converted using the exchange rate applicable on the ToV recognition date.

ToV Tax & VAT

- Disclosed amounts exclude VAT where applicable.

Cross-Border Transfers of Value

- Theramex consolidates all ToVs from its affiliates to UK-registered and Northern Ireland-registered HCPs, ORDMs, and HCOs.
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Managing Consent

Theramex UK manages disclosure consent as follows:

- HCPs and ORDMs provide explicit consent via a signed “Consent for Disclosure Form” as part of their service agreement.
 - Individuals are informed of Theramex’s transparency commitments in compliance with applicable data privacy laws.
 - Indirect ToVs where explicit consent was not collected by partners are disclosed in aggregate.
 - If an individual denies consent for a specific ToV, all their ToVs for the reporting period are disclosed in aggregate.
 - For the 2024 period, all individual ToV are disclosed in aggregate on our Theramex website
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Categories for Disclosure

1. Collaborative Working

- Theramex did not engage in Collaborative Working during the reporting period.

2. Donations & Grants

- Financial grants were provided to HCOs supporting healthcare.
- No material donations or benefits in kind were granted to institutions.

3. Contribution to Cost of Events

- **Sponsorship Agreements:** Payments to an HCO or appointed third party for managing events, including scientific and professional meetings and material development.
- **Registration Fees:** Funding for HCPs attending third-party meetings and events.
- **Travel & Accommodation:** Financial support for hospitality for HCPs attending meetings and events.

4. Contracted Services

- **Fees:** Payments for services provided by HCPs/HCOs, including speaker engagements, consultancy, data analysis, and material development.
 - **Expenses:** ToVs related to contracted services such as travel and accommodation.
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Managing Report Submission

- The Transparency Report is published on Theramex website <https://www.theramex.com/transparency/>
- The Transparency Report remains public for at least 3 years.
- Theramex retains all disclosure records for a minimum of 5 years after the reporting period.

Sources of Further Information

- Updates on the Disclosure Code can be found on the ABPI website: www.abpi.org.uk
- Contact Theramex UK's Transparency Department at: Dataprivacy@theramex.com