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Theramex: Methodological note for HCP/ORDM/HCO disclosure 2025

Data year: 2025

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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).

Contents

1 Definitions

1.1 Recipients

Transfers of value (ToV) are disclosed for all Healthcare Organisations (HCO), Healthcare Professionals (HCP) and Other Relevant Decision Makers (ORDM) whose primary practice, main professional address, or place of incorporation is in the United Kingdom.

1.2 Kind of ToVs

The ToV covered in the Theramex report are:

- Donations and grants provided to HCO, institutions and other organisations.
- Fees and expenses paid for contracted services between companies and institutions, organisations or associations of health professionals.
- Support of attendance by HCPs and ORDMs at events/meetings whether paid directly, indirectly or via another party.
- Fees and expenses paid for contracted services to HCPs and ORDMs, or to their employers on their behalf.
- Sponsorship, including contributions to costs related to events/meetings paid to HCOs or to organisations managing events on their behalf, which may include support of HCPs not known to the company via the HCO by way of registration fees, accommodation and travel.

There are no ToV linked to collaborative working in the report period.

2 Disclosure's Scope

2.1 Products concerned

[Theramex UK's disclosure covers ToV relating to prescription-only medicines within its Women's Health and Fertility portfolio.

2.2 Company concerned

[This methodology applies to Theramex HQ UK Limited and any Theramex Affiliate making ToVs to UK recipients within the scope defined in clause 1.1 of the 2024 ABPI Code of Practice for the Pharmaceutical Industry.

2.3 Excluded ToVs

- Ordinary Commercial Transactions – that are part of the routine purchase and sale of medicines.
- Medical Samples – samples of medicines provided to HCPs.
- Medical Utility Items – inexpensive items of medical or educational value intended for clinical use.
- Patient Materials – educational materials specifically designed for patients, for example information literature, leaflets, tools designed purely for patient education or health management.
- Subsistence Costs - meals and drinks. Unless the ToV forms an integral part of a sponsorship agreement towards a third-party event.
- There are no disclosures related to over-the-counter (OTC) medicines or medical devices.
- Any other ToV which is out of the reporting scope, as defined by the EFPIA and ABPI Code of Practice.

2.4 ToVs date

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 payment.
- Indirect ToVs (e.g., travel and accommodation) are disclosed based on the event date.

2.5 Direct ToVs

A direct ToV is one made directly by Theramex for the benefit of a recipient. These include fee for services and direct sponsorship fees.

2.6 Indirect ToVs

An indirect ToV is one made on behalf of Theramex for the benefit of a recipient or through an intermediate and where Theramex knows or can identify the recipient that will benefit from the ToV. These include arrangements via third party event organisers.

2.7 Non-monetary ToVs

A non-monetary ToV is a benefit in kind or service provided by Theramex to a recipient.

2.8 ToVs in case of partial attendances or cancellation and refund

Only ToVs that benefit the recipients are included. If an HCP or ORDM does not attend an event or the event is cancelled, only incurred ToVs that can be reasonably associated with the individual are attributed. If travel or accommodation is booked but the event is cancelled or not attended, no ToV is attributed to that individual.

2.9 Cross-border activities

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

2.10 R&D

Research and Development ToV to HCPs or HCOs related to the planning or conduct of:

- **i.** Non-clinical studies (as defined in the OECD Principles of Good Laboratory Practice).
- **ii.** Clinical trials (as defined in Regulation 536/2014).
- **iii.** Non-interventional studies that are prospective in nature and that involve the collection of patient data from or on behalf of individual or groups of health professionals specifically for the study.

There are no ToV for R&D over the disclosure period.

2.11 Voluntary disclosure

Theramex does not make voluntary disclosures outside the requirements of the ABPI Code of Practice.

3 Specific considerations

3.1 Country unique identifier

Theramex uses OneKey IDs where available.

3.2 Self-incorporated HCP

Self-incorporated HCPs are regarded as individual HCPs. Where appropriate the ToV are disclosed against the individual.

3.3 Multi-year agreements

Multi-year agreements include only payments made within the relevant disclosure period.

3.4 Country specificities

The ABPI requirements are followed in the UK.

3.5 Quality Checks

Data is collated and cross checked between the Theramex Finance System, Event Management System and Contracts.

4 Data protection legal basis

4.1 Consent collection

Theramex does not have a legal basis to disclose individually as the company do not obtain authorisation from HCPs to publish individual ToV on the Theramex corporate website. Therefore, ToV relating to HCPs are disclosed on an aggregate basis.

4.2 Legitimate interests

Theramex processes personal data relating to HCPs, ORDMs and HCOs where necessary to meet its transparency obligations under the ABPI Code of Practice and for the administration of ToV. Personal data is processed on the basis of Theramex's legitimate interests in maintaining appropriate transparency and complying with applicable industry standards.

As individual disclosure of HCP ToV is not undertaken, ToV relating to HCPs is published on an aggregate basis. ToV to HCOs is disclosed individually where required by the ABPI Code of Practice.

5 Form of disclosure

5.1 Date of publication

June 30th 2026

5.2 Disclosure platform

Excel file available to download from the Transparency page on Theramex HQ Website
https://www.theramex.com/transparency/

5.3 Disclosure language

English

6 Disclosure financial data

6.1 Currency

GBP (£)

6.2 VAT included or excluded

Where possible, Theramex discloses the full amount of ToV exclusive of VAT. In some instances, VAT may not be separable. In these cases, VAT has been included in the disclosure amount.

6.3 Calculation rules

Payments made in other currency are converted using the conversion rate of the date of the ToV.

7 Additional Information

No further information.