

Tillotts Pharma AB (“**Tillotts**”) Methodological note for HCP /HCO disclosure 2025 in Sweden (the “**Territory**”)

Data year: 2025

Year of publication: 2026

This methodological note explains the data disclosed by Tillotts for the 2025 reporting period and summarises the methodologies used to prepare the disclosure. Its purpose is to support understanding of the published Transfers of Value. Publication of this methodological note alongside the disclosure dataset is required under Chapter 2, Section 3, Article 4.3 of the LIF Ethical Rules for the Pharmaceutical Industry in Sweden (the “**Code**”) and forms part of the standardised EFPIA disclosure framework used for 2025 onward.

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1. Definitions

1.1 Recipients

Healthcare Professionals (HCPs): physicians, dentists, pharmacists, nurses, or other healthcare personnel who are authorized to prescribe, purchase, supply, recommend, or administer medicinal products.

Healthcare Organizations (HCOs): any legal entity that provides healthcare services, or conducts research or education in this field, or is an interest organization with a medical or scientific focus, excluding interest organizations as referred to in LER Chapter 3.

1.2 Kind of ToVs

Transfers of Value (“**ToV**”) include

- Fees for service and consultancy (honoraria) and related expenses to HCPs
- Donations and grants to HCOs
- Contribution to costs related to events including sponsorships to HCOs
- Research and Development ToVs

Irrespective if they were directly effected by Tillotts or made via intermediaries or contracted third parties, and
Irrespective if they were made by Tillotts or by any of its affiliated companies for Recipients in the Territory.

2. Disclosure's Scope

2.1 Products concerned

Disclosures relate to prescription-only and over-the-counter medicines. One product includes medical device components; these are included in disclosure only insofar as they form part of the prescription medicine presentation. No stand alone medical device Transfers of Value are included.

2.2 Company concerned

Disclosures cover all ToVs made by Tillotts or any of its affiliated companies to Recipients based or residing in the Territory, with all cross-border activities consolidated into the dataset of the Territory, rather than reported separately. If the company name or structure changes in the future, such changes will be described in this section and cross referenced so that disclosures from previous years can still be identified and tracked by the public.

2.3 Excluded ToVs

The following ToVs are excluded from disclosure: ToVs related to

- Meals
- Information- and educational material and medical utility items
- Medical samples
- Purchases of ads

2.4 ToVs date

The disclosure covers Transfers of Value related to payments effected to Recipients during the 2025 calendar year.

2.5 Direct ToVs

Direct Transfers of Value include payments made directly to Recipients by Tillotts or one of its affiliated companies.

2.6 Indirect ToVs

Indirect Transfers of Value include payments made through third party intermediaries where the ultimate beneficiary is an identifiable HCP or HCO. These activities may involve support routed via event agencies or third party congress organisers, medical communications or educational partners delivering activities on behalf of Tillotts, or cross-border support provided by affiliated Tillotts entities to Recipients in the Territory. Indirect ToVs are disclosed once only, against the relevant individual or organisation.

2.7 Non-monetary ToVs

Non-monetary Transfers of Value include in kind contributions provided to identifiable HCPs or HCOs, such as travel, accommodation or registration fees paid directly by Tillotts. These transfers are disclosed at the value of the cost incurred.

2.8 ToVs in case of partial attendances or cancellation and refund

Transfers of Value are only reported for services and activities that have actually been performed. No disclosure is made for cancelled or non-attended services for which no payment has been made.

2.9 Cross-border activities

Transfers of Value provided to Recipients in the Territory by one of Tillotts affiliated companies outside the Territory are consolidated and disclosed within dataset of this Territory. Tillotts receives cross-border data from its affiliated companies and applies the same categorisation and verification checks used for all generated ToVs in the Territory. Cross-border transfers are disclosed once only, against the relevant Recipient in the Territory.

2.10 R&D

Research and Development Transfers of Value are disclosed in aggregated form and include Transfers of Value to Healthcare Professionals and Healthcare Organisations in Sweden related to:

- non-clinical studies (as defined in the OECD Principles of Good Laboratory Practice),
- clinical trials (as defined in Regulation (EU) No 536/2014),
- non-interventional studies that are prospective in nature and involve the collection of data from, or on behalf of, identifiable individuals or groups of Healthcare Professionals, and

– costs that are directly related and ancillary to these activities.

2.11 Voluntary disclosure

N/A

3. Specific considerations

3.1 Country unique identifier

Tillotts does not use or submit professional identifiers for Recipients in the course of the disclosure of ToVs.

3.2 Self-incorporated HCP

Where an HCP provides services through their own limited company or organisation, Tillotts report the Transfer of Value to the HCO.

3.3 Multi-year agreements

For multi-year agreements, Transfers of Value are allocated to the calendar year in which payment for the relevant services or activities were effected by Tillotts. Prepayments are recognised when the activity occurs, and any adjustments such as credit notes are applied to the year of the original transfer.

3.4 Country specificities

N/A

3.5 Quality Checks

Prior to submission, Tillotts undertakes internal quality checks to ensure that disclosures are accurate and complete. These checks include verifying data from internal systems such as finance and customer relationship management or Compliance management tools, cross-checking Transfers of Value against contracts and agreements, confirming correct categorisation, and reviewing currency, VAT and data-protection requirements. All checks are completed and reviewed internally before final approval and submission of the disclosure document.

4. Data protection legal basis

4.1 Consent collection

For contracted services (honoraria, consultancy, speaker engagements and related expenses), Tillotts uses Consent as the lawful basis for publishing individual-level data. Recipients are informed at the point of contracting through agreements and privacy notices. Partial consents are not accepted, in line with EFPIA guidance. Where consent is not given or is withdrawn, the related Transfers of Value are disclosed in aggregate. Withdrawals apply to future disclosures and may be submitted via dataprivacy@tillotts.com.

Transfers to HCOs do not require consent.

Cross-border processing is carried out under appropriate safeguards.

4.2 Legitimate interests

N/A

5. Form of disclosure

5.1 Date of publication

30/05/26

5.2 Disclosure platform

LIF's database for Transfer of Value: <https://www.lif.se/etik/vardeoverforing/>

5.3 Disclosure language

Swedish

6. Disclosure financial data

6.1 Currency

All disclosures are reported in Swedish krona (SEK). Where payments were originally made in another currency, Tillotts converts the amount into SEK using either the exchange rate applicable on the date of payment or the European Central Bank's average annual exchange rate for the relevant year, depending on the documentation available.

6.2 VAT included or excluded

Transfers of Value are reported excluding VAT. Salary, honoraria and expenses for fees paid out as salaries are reported as gross earnings, but no social security contributions are reported. For fees that are invoiced, the invoiced amount is paid and reported, excluding VAT.

6.3 Calculation rules

Transfers of Value are calculated using the actual cost incurred by Tillotts. In-kind or non-monetary Transfers of Value are disclosed at the value paid to secure the benefit provided. Where expenses include both business and non-business elements, only the business-related portion is disclosed. All values are rounded to two decimal places for publication

7. Additional Information

No additional methodological considerations apply.