



# **ROVI Biotech Ltd.**

## **Methodological Note – Transfer of Values 2025**

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# 1. Introduction

Our society expects the pharmaceutical industry to be able to make the best possible medicines available to them. To achieve this objective, it is necessary to invest in Research and Development, as well as in training, requiring close collaboration with Healthcare Professionals (HCPs), Healthcare Organizations (HCOs) and Patient Organizations (POs). This valuable exchange of knowledge and experience makes it possible to have the most innovative treatments, which improves the life expectancy and quality of life of patients.

It is necessary for these collaborations to be transparent and for society to be able to trust that they are due to the need to develop new medicines, to constant updating of HCPs according to scientific evidence and its application to clinical practice, all of this with the common goal of providing better patient care.

When collaborating with medical experts, we comply with applicable laws and regulations such as the EFPIA Disclosure Code in Europe and fully respect the independence and integrity of these professionals.

That is why, since 30 June 2016, companies disclose transfers of value made to HCPs, such as consultancy and advisory boards, speaker fees, and sponsorship to attend meetings. This transformational step in the relationship between industry and health professionals is a result of the EFPIA Disclosure Requirements.

The Disclosure provisions in the EFPIA Code require all EFPIA member companies and companies that are members of EFPIA member associations to disclose transfers of value to HCPs, HCOs and POs. They will also have to disclose – by HCP or HCO – the total amounts of value transferred, by type of activity, which could consist of, for instance, a grant to an HCO, a consultancy fee for speaking, payment for travel, or registration fees to attend a medical education congress. Also each Member Company must disclose a list of POs to which it provides financial support and/or significant indirect/non-financial support or with whom it has engaged to provide contracted services for that Member Company.

More information related to this initiative:

<https://efpia.eu/relationships-code/disclosure-of-payments/>

## 2. Definitions

**ROVI Biotech Ltd** applies the definitions established by the EFPIA Code of Conduct.

### 2.1. Recipients

#### 2.1.1. Recipients

Healthcare Professionals (HCP), Healthcare Organizations (HCO), and Patient Organizations (PO) that carry out their activity in UK or whose main professional address is located in UK.

### **2.1.2. Healthcare Professional (HCP)**

Any natural person that is a member of the medical, dental, pharmacy or nursing professions or any other person who, in the course of his/her professional activities, may prescribe, purchase, supply, recommend or administer a medicine and whose primary practice, principal professional address or place of incorporation is in the UK.

### **2.1.3. Healthcare Organisation (HCO)**

Any legal person/entity (i) that is a healthcare, medical or scientific association or organisation (irrespective of the legal or organisational form) such as a hospital, clinic, foundation, university or other teaching institution or learned society (except for POs within the scope of article 2.1.4) whose business address, place of incorporation or primary place of operation is in the UK or (ii) through which one or more HCPs provide services.

### **2.1.4. Patient Organisation (PO)**

Non-for-profit legal person/entity (including the umbrella organisation to which it belongs), mainly composed of patients and/or caregivers, that represents and/or supports the needs of patients and/or caregivers and which business address, place of incorporation or primary place of operation is in UK.

## **2.2. Types of Transfer of Values (ToVs)**

### **2.2.1. Transfer of Value (ToV)**

A Transfer of Value (ToV) is any Direct or Indirect transfer of value, whether in cash, in kind or otherwise, made to or for the benefit of a Healthcare Professional (HCP), Healthcare Organisation (HCO) or Patient Organisation (PO), whether for promotional purposes or otherwise, in connection with the development and sale of medicinal products for human use (prescription-only medicines (POM)).

Direct ToVs are those made directly by ROVI Biotech td for the benefit of a Recipient and are defined in detail in Section 3.5 of this Methodological Note. Indirect ToVs are those made on behalf of ROVI Biotech Ltd for the benefit of a Recipient and are defined in detail in Section 3.6 of this Methodological Note.

### **2.2.2. Donations and Grants**

Collectively, mean providing funds, assets or services freely given for the purpose of supporting healthcare, scientific research or education, with no consequent obligation on the Recipient to provide goods or services to the benefit of the donor in return.

### **2.2.3. Contribution for scientific and professional meetings organized by HCOs**

Contributions for costs related to meetings, through Healthcare Organizations or third parties (including sponsorship for the attendance of Healthcare Professionals), such as: (i) Registration fees; (ii) Collaboration or sponsorship agreements with Healthcare Organizations or third parties selected by them for the management of the meeting; (iii) Travel and accommodation.

### **2.2.4. Contribution in scientific and professional meetings for HCPs**

Contribution for costs related to meetings such as:

- (i) Registration fees; and
- (ii) Travel and accommodation.

ROVI Biotech Ltd supports the training of Healthcare Professionals with the aim of improving, expanding, and updating their knowledge, so that it contributes to the health care of citizens. ROVI Biotech Ltd has primarily focused its efforts on training activities organized by scientific societies, foundations, hospitals, and universities, providing support for attendance at congresses and scientific meetings organized by these entities.

### **2.2.5. Provision of services**

Transfers of Value related to or carried out under contracts between pharmaceutical companies and Healthcare Professionals or Healthcare Organizations, institutions, organizations, associations, or foundations composed of Healthcare Professionals, from which the provision of a service or a Transfer of Value not covered by the aforementioned categories is derived. Transfers of Value made as fees will be disclosed separately from those made as agreed expenses for the provision of these services.

ROVI Biotech Ltd has required the involvement of Healthcare Professionals to deliver presentations, develop scientific content, provide advice on specific topics, and carry out training activities.

The remuneration has been moderate and consistent with the nature of the activity, the level of knowledge, experience, and the time invested.

### **2.2.6. Research & Development (R&D)**

Transfers of Value associated with the design or conduct of preclinical studies, clinical trials, and observational studies with medicinal products are included, covering amounts related to fees,

investigator meetings, collaborations with investigator-initiated studies, and CROs involved in research and development. These Transfers of Value are disclosed on an aggregated basis.

### **2.2.7. Support to PO**

Any collaborations with Patient Organizations to which ROVI Biotech Ltd provides financial or any other type of support are included, along with a brief description of the scope and nature of the support provided, and the monetary value.

## **3. Disclosure's scope**

### **3.1. Products concerned**

The published Transfers of Value include all those related to prescription-only medicines (POM). See Section 3.3 on excluded Transfers of Value.

### **3.2. Company concerned**

All Transfers of Value made by ROVI Biotech Ltd to Healthcare Professionals (HCPs), Healthcare Organizations (HCOs), and Patient Organizations (POs) who practice or are registered in UK are included. Additionally, Transfers of Value made by ROVI's parent company Laboratorios Farmaceuticos ROVI S.A (Spain) to Healthcare Professionals (HCPs) and/or Healthcare Organizations (HCOs) who carry out their activity in UK are also included.

### **3.3. Excluded ToVs**

In accordance with the provisions of Article 23.03 of the EFPIA Code, without limitation, ToVs that (i) are solely related to over-the-counter medicines; (ii) are not listed in Section 23.05 of such Article 23, such as Items of Medical Utility (governed by Article 17), meals (governed by Article 10, especially Section 10.05), Medical Samples (governed by Article 19); or (iii) are part of ordinary course purchases and sales of Medicinal Products by and between a ROVI Biotech Ltd and a HCP (such as a pharmacist) or a HCO do not fall within the scope of the disclosure obligation described above in "*General Obligation*".

### **3.4. ToVs date**

All Transfers of Value made in 2025 have been disclosed. In the case of multi-year contracts, the Transfers of Value recorded in our financial system in 2025 have been published.

### 3.5. Direct ToVs

Transfers of Value (ToV) are considered direct when the pharmaceutical company itself directly makes the payment or provides monetary consideration for the benefit of a Recipient. These direct ToVs include, for example, fees received by a Healthcare Professional for providing a service (speaker, moderator, etc.), or collaborations/sponsorships received by Healthcare Organizations (HCOs) for the organization of training activities and scientific-professional meetings when the funds are received in the HCO's bank account.

### 3.6. Indirect ToVs

Transfers of Value (ToVs) are considered indirect when they are made by a third party (suppliers, agents, partners, or affiliates, including foundations), acting on behalf of the company, for the benefit of a Recipient, and the company identifies or can identify the Recipient.

These indirect ToVs include, for example, payments for registration fees, accommodation, and travel to attend training activities and scientific-professional meetings, which are paid to suppliers and whose ultimate beneficiary is the identifiable Healthcare Professional.

Additionally, payments to third parties assigned by Healthcare Organizations for the management of events organized by those Healthcare Organizations are also considered indirect ToVs. These ToVs are disclosed in the name of the Healthcare Organization that is the beneficiary of these funds.

### 3.7. Non-monetary ToVs (in-kind ToVs)

In 2025, there were no in-kind Transfers of Value made by ROVI Biotech Ltd.

### 3.8. ToVs in case of partial attendance, cancellation and refund

ROVI Biotech Ltd discloses effective Transfers of Value, i.e., those in which a Healthcare Professional (HCP) or Healthcare Organization (HCO) has received a benefit. Transfers of Value that have been cancelled or cancelled with cancellation fees, and therefore have not been carried out, are not included in the disclosure, as the Transfer of Value was not effectively made.

In cases where there has been partial participation, such Transfers of Value have been included.

In the exceptional case of reimbursement of minor travel expenses (e.g., taxi, mileage, etc.), such Transfers of Value have also been included.

### 3.9. Cross-border activities

All Transfers of Value made by ROVI Biotech Ltd to Healthcare Professionals (HCPs), Healthcare Organizations (HCOs), and Patient Organizations (POs) who practice or are registered in UK are included. Additionally, Transfers of Value made by ROVI's parent company Laboratorios Farmaceuticos ROVI S.A (Spain) to Healthcare Professionals (HCPs) and/or Healthcare Organizations (HCOs) who carry out their activity in UK are also included.

### 3.10. Research & Development (R&D)

Transfers of Value associated with the design or conduct of preclinical studies, clinical trials, and observational studies with medicinal products are included, covering amounts related to fees, investigator meetings, collaborations with investigator-initiated studies, and CROs involved in research and development. These Transfers of Value are disclosed on an aggregated basis.

### 3.11. Voluntary disclosure (anything discloses beyond the national code)

Not applicable.

## 4. Specific considerations

### 4.1. Country unique identifier

Laboratorios Farmacéuticos ROVI, S.A. (Spain), that is ROVI Biotech Ltd, parent company, assigns a unique identifier internally in its systems to each Healthcare Professional (HCP), Healthcare Organization (HCO), and Patient Organization (PO) in order to ensure proper identification and accurate management of Transfers of Value .

For the disclosure of Transfers of Value:

- In the case of Healthcare Professionals (HCPs), the personal data included are: full name, encrypted unique taxpayer reference (UTR), and city of professional practice.
- Healthcare Organizations (HCOs) are identified by their corporate name, encrypted company registration number, and the city where their registered office is located.
- Patient Organizations (POs) are identified by their corporate name and the city where their registered office is located.

## 4.2. Multi-year agreements

In the case of multi-year contracts, the Transfers of Value recorded in our financial system in 2025 have been published.

## 4.3. Country specificities

In the United Kingdom, ROVI Biotech Ltd discloses Transfers of Value in accordance with the EFPIA Disclosure Code, which requires the annual publication of Transfers of Value to Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs).

For disclosures involving personal data, ROVI Biotech Ltd relies on an appropriate lawful basis in accordance with applicable data protection legislation (UK GDPR). Depending on the circumstances, this may include the consent of the Healthcare Professional or the pursuit of legitimate interests in ensuring transparency of interactions between the pharmaceutical industry and healthcare stakeholders.

In all cases, ROVI Biotech Ltd informs Healthcare Professionals that their data may be disclosed in accordance with these transparency obligations. Healthcare Professionals are provided with clear information regarding such processing, including their data protection rights, through contractual arrangements and/or privacy notices.

## 4.4. Quality Checks

ROVI Biotech Ltd has made efforts to define an appropriate working framework, as well as to establish control measures that allow it to identify opportunities for improvement.

The data accurately and rigorously reflect the information recorded in ROVI for this purpose.

However, if any incorrect information is detected, it will be reviewed and, where necessary, periodic updates will be published in the event of significant changes to the individual disclosure.

# 5. Data protection legal basis

In UK, pursuant to applicable EFPIA code provisions on transparency of Transfers of Value, the disclosure of Transfers of Value must be carried out in accordance with the following criteria:

- In the case of Healthcare Professionals, and whenever legally permissible or authorized and the accuracy and consistency of the information can be ensured, disclosure of Transfers of Value must be made on an individual basis, identifying the relevant Healthcare Professional.

- In the case of Healthcare Organizations and Patient Organizations, Transfers of Value must in all cases be disclosed on an individual basis.

## 5.1. Consent collection and consent withdrawal

The legal basis for the individual disclosure of Transfers of Value (at Healthcare Professional level) is the consent granted by each Healthcare Professional who is the recipient of the relevant Transfer of Value.

**ROVI Biotech Ltd** has complied with its obligations as data controller in relation to the Healthcare Professionals affected by individual transparency disclosure. In addition, ROVI Biotech Ltd. has adopted measures aimed at balancing, to the extent possible, the interference arising from such disclosure. In particular, the following measures have been implemented:

- Enhanced information has been provided to Healthcare Professionals at the time of data collection regarding the scope and consequences of consenting to individual transparency disclosure. Where applicable, the collection of consent is duly documented.
- Data subjects' rights in connection with this processing are handled in an expedited and reinforced manner. With regard to the withdrawal of consent, if a Healthcare Professional exercises this right and demonstrates to ROVI Biotech Ltd. the existence of justified and legitimate grounds relating to his or her particular situation, such that the legitimate interest supporting the disclosure does not prevail, the company may exclude his or her data from individual publication and disclose it, on an exceptional basis, in aggregated form.
- De-indexing of the published information. The published information may not be publicly accessed through automated, or machine-reading means such as search engines, data scrapers, or similar technologies.

## 5.2. Legitimate interest

Currently, the processing of personal data for the purposes of individual transparency disclosure concerning Healthcare Professionals is not based on legitimate interests in this territory.

# 6. Form of Disclosure

## 6.1. Date of publication

The publication of Transfers of Value takes place within the first six months following each applicable reporting period, in accordance with the requirements established in the EFPIA Code.

## 6.2. Disclosure platform

The disclosure of Transfers of Value is carried out on the website of ROVI Biotech Ltd. at the following link: <https://rovi.es/uk/>

## 6.3. Disclosure language

The language used for the disclosure of Transfers of Value is English.

# 7. Disclosure financial data

## 7.1. Currency

The amounts of the Transfers of Value are indicated in British pounds (£).

## 7.2. VAT included or excluded

The publication of the data is declared as a net amounts.

# 8. Additional information

Not applicable.