



Grünenthal UK Ltd. Transparency Disclosure Methodological Note for the reporting year 2025

Grünenthal UK Ltd.

Transparency Disclosure Methodological Note – Reporting Year 2025

Introduction

Grünenthal is committed to ensuring transparency regarding our activities and interactions with all our stakeholders, and we encourage our stakeholders to act in the same way, as one of the four key principles underpinning the Association of the British Pharmaceutical Industry (ABPI) Code of Practice.

This document describes the methodologies used by Grünenthal UK Ltd. in the preparation and disclosure of Transfers of Value (ToVs).

1. Definitions

1.1 Recipients

Recipients include Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs), Healthcare Organisations (HCOs), and Patient Organisations (POs), as defined in Clause 1 of the ABPI Code of Practice.

Data relating to individuals is validated via IQVIA OneKey reference data, and where applicable, Grünenthal may report the IQVIA OneKey identifier to ensure accuracy and unique identification.

1.2 Kind of ToVs

Transfers of Value include:

- Collaborative Working contributions
- Grants and Donations
- Sponsorship for meetings and events
- Fee for Service payments
- Support for attendance at meetings and events



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- Research and Development (R&D) related ToVs

Where non-financial support is provided, a fair market value (FMV) equivalent is assigned and disclosed.

2. Disclosure Scope

The following categories of Transfers of Value (ToVs) are in scope for disclosure in accordance with Clause 28 and Clause 29 of the ABPI Code of Practice and are disclosed via the mandatory disclosure template or, where applicable, via the Grünenthal UK website:

- **Collaborative Working projects (Clause 20):** Includes payments made to Healthcare Organisations (HCOs) in relation to projects involving shared contributions and/or pooling of resources for the benefit of patients and the NHS. Where non-financial resources are provided, a fair market value (FMV) is assigned and disclosed. Collaborative working summaries and outcomes are published on the Grünenthal UK website.
- **Grants and Donations to HCOs (Clause 23):** Includes payments, goods, services or other benefits in kind provided to HCOs and other organisations. Non-financial support is disclosed using FMV.
- **Sponsorship to HCOs for meetings and events (Clause 10.12):** Includes contributions to event-related costs paid to organisations.
- **Fee for Service to HCOs (Clause 24.6):** Includes payments for contracted services such as advisory boards, speaking engagements, authorship, and involvement in R&D activities.
- **Fee for Service to HCPs and ORDMs (Clause 24.6):** Includes payments for contracted services including advisory boards, speaking, authorship and R&D involvement.
- **Support for HCP attendance at meetings and events (Clause 10.11):** Includes travel, accommodation and registration fees.



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- **Research & Development (R&D):** Includes ToVs related to clinical trials, non-interventional studies and prospective observational studies. These are disclosed on an aggregate basis only.
- **Patient Organisation disclosures (Clause 29):** Includes grants, donations, fee-for-service and sponsorship/support to Patient Organisations (POs). These disclosures are published on the Grünenthal UK website, with links provided via Disclosure UK. R&D-related ToVs to POs are disclosed on an aggregate basis.

NOTE: For full definitions, refer to Clause 1 of the ABPI Code of Practice.

2.1 Products concerned

This disclosure covers Transfers of Value related to prescription-only medicines in accordance with the ABPI Code of Practice.

2.2 Company concerned

This disclosure relates to Grünenthal UK Ltd. Activities conducted via third parties or other Grünenthal entities are included where the ultimate recipient is a UK-based HCP, ORDM, HCO, or PO.

2.3 Excluded ToVs

Transfers of Value excluded from disclosure are those not required under Clause 1.25 of the ABPI Code of Practice.

2.4 ToVs date

Transfers of Value are reported based on the date of payment, irrespective of when the activity took place.

2.5 Direct ToVs

Direct Transfers of Value include payments made directly to recipients such as fees for service, grants, donations, and sponsorship.

2.6 Indirect ToVs

Indirect Transfers of Value occur where payments are made via third parties or intermediaries, such as event organisers, where the ultimate recipient can be identified.



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2.7 Non-monetary ToVs

Non-monetary Transfers of Value include goods, services, or other benefits in kind. These are disclosed using a fair market value equivalent.

2.8 ToVs in case of partial attendance or cancellation and refund

In cases where engagements are cancelled, only costs incurred are disclosed.

2.9 Cross-border activities

Cross-border Transfers of Value are captured where a UK recipient receives a ToV from a Grünenthal entity or third party outside the UK. These are recorded and disclosed in the same manner as domestic ToVs.

2.10 R&D

Transfers of Value related to Research and Development activities, including clinical trials, non-interventional studies, and prospective observational studies, are disclosed on an aggregate basis only, in line with Clause 28 of the ABPI Code.

2.11 Voluntary disclosure

Grünenthal does not disclose Transfers of Value beyond those required by the ABPI Code of Practice.

3. Specific Considerations

3.1 Country unique identifier

Grünenthal uses IQVIA OneKey identifiers to support internal data validation and ensure accurate identification of recipients. These identifiers may be reported alongside ToV data where applicable.

3.2 Self-incorporated HCPs

Transfers of Value to self-incorporated HCPs are disclosed in accordance with ABPI Code requirements, based on whether the payment is made to the individual or their legal entity.



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3.3 Multi-year agreements

Transfers of Value relating to multi-year agreements are disclosed in the calendar year in which the payment is made.

3.4 Country specificities

Where collaborative working projects are undertaken, summaries and outcomes are published on the Grünenthal UK website. Where applicable, Transfers of Value are allocated proportionately when multiple parties are involved.

3.5 Quality checks

Transfers of Value are recorded using internal systems including a Customer Relationship Management (CRM) system and Finance Payments System. Data is reconciled between systems and against contractual agreements to ensure accuracy prior to disclosure.

4. Data Protection Legal Basis

4.1 Consent collection

For engagements conducted under a consent-based framework:

- Transfers of Value are disclosed on an individual named basis where consent is provided.
- Where consent is not provided or withdrawn, data is disclosed on an aggregate basis.

4.2 Legitimate interests

For engagements conducted under a legitimate interests framework:

- Transfers of Value are disclosed on an individual named basis.
- Individuals have the right to object to processing, and requests are assessed in accordance with applicable data protection laws.

During the 2025 reporting year, both legal bases were applied depending on the contractual framework in place.



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5. Form of Disclosure

5.1 Date of publication

30/06/2026

5.2 Disclosure platform

Disclosure UK – www.disclosureuk.org.uk

5.3 Disclosure language

English

6. Disclosure Financial Data

6.1 Currency

All Transfers of Value are disclosed in Great British Pounds (GBP). Where payments are made in another currency, conversion is applied and exchange rate details can be provided upon request.

6.2 VAT included or excluded

Transfers of Value are disclosed as gross amounts inclusive of VAT where applicable.

6.3 Calculation rules

Non-monetary Transfers of Value are assigned a fair market value. Where payments relate to multiple recipients, values are allocated proportionately where possible.

7. Additional Information

Grünenthal uses a combination of automated systems and manual processes to record and process Transfers of Value. Every effort is made to ensure accuracy, and any discrepancies identified are addressed promptly in accordance with Disclosure UK timelines.

March 2026



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Queries regarding disclosed data can be submitted via the Disclosure UK platform or
directly to Grünenthal.
