

METHODOLOGICAL NOTE

Publication of transfers of value 2025 – Spain

Date of last update: 17/06/2026

1. Definitions

1.1 Recipients

For the purposes of this methodological note, recipients are understood to be Healthcare Professionals (HCPs), Healthcare Organisations (HCOs) and Patient Organisations (POs) that may directly or indirectly receive reportable transfers of value from Ferrer Internacional, S.A. In the case of HCPs, this includes those who carry out their professional activity or have their main professional address in the EFPIA area. In the case of HCOs and POs, this includes those whose place of incorporation is located worldwide, provided that the transfer of value is reportable in accordance with the scope and criteria of this note.

- **Healthcare Professionals (HCPs):** any member of the medical profession, dentist, pharmacist, nurse or podiatrist who, in the course of their profession, performs actions related to the sale, distribution, administration or prescription of medicinal products. This also includes professionals involved in the distribution of medicinal products, wholesalers, persons working in health administration and managers of healthcare centres, among others.

Retired or deceased Healthcare Professionals and other special cases: Ferrer publishes all transfers of value made to those persons who, at the time such transfers were made, met the definition of HCP in accordance with Spanish legislation.

- **Healthcare Organisations (HCOs):** any legal person or entity that is a medical or scientific association, healthcare institution, hospital, clinic, foundation, university or other academic entity, scientific society (excluding patient organisations), or entity through which one or more HCPs provide services.
- **Patient Organisations (POs):** non-profit organisations, including the umbrella organisations to which they belong, mainly composed of patients and/or their caregivers, that represent or support the needs of patients and/or their caregivers.

Other relevant concepts:

Event: a scientific-professional meeting, congress, conference, symposium, workshop, in-person or distance training course, expert meeting, site visit or similar activity organised or sponsored by Ferrer, or under its control through third parties.

Interaction: an activity carried out, organised or sponsored by Ferrer Internacional or by third parties, which may directly or indirectly give rise to collaborations, support or consideration in favour of a recipient.

Transfer of value: any direct or indirect payment or consideration, in cash, in kind or in any other form, irrespective of its purpose.

1.2 Types of transfers of value

Transfers of value are grouped in accordance with the categories set out in the Farmaindustria Code of Practice and the EFPIA Code, adapted to the operations described by Ferrer:

- **Donations and grants to Healthcare Organisations:** monetary or in-kind contributions made in favour of an HCO or PO, accepted by it and with no consideration for Ferrer. Where the donation is in kind, the legislation or codes applicable according to the type of product will be respected. In 2025, no in-kind donations were made.
- **Contributions to educational activities or scientific and professional meetings:** collaborations in congresses, scientific meetings and professional events organised by third parties or by Ferrer. They include sponsorships, stands, symposia, registration fees, travel and accommodation for HCPs, where applicable.
- **Sponsorship:** Any funding or financial support activity whereby Ferrer makes a contribution to an event, meeting, study, scientific activity or similar initiative. As a result of this collaboration, Ferrer receives, directly or indirectly, consideration, a return or an associated benefit.
Provision of services: A contractual relationship formalised in advance in writing, under which Ferrer engages an HCP, HCO or PO to provide a specific advisory or consultancy service intended to address a legitimate need previously identified and documented. Such engagement is based on the third party's specific experience, knowledge or capability and entails reasonable, proportionate remuneration aligned with market value, which may not constitute an undue incentive or a covert or improper promotional activity.
Research and Development (R&D): activities associated with the design or execution of preclinical studies, clinical trials and prospective post-authorisation studies, as well as transfers related to fees, meetings and scientific events linked to these studies. These transfers are published in aggregate form.
- **Other transfers:** Not applicable for the 2025 publication

1.3 Abbreviations and names used

- **Ferrer Internacional, S.A.:** the legal entity responsible for transfers of value managed from Spain. For the purposes of this note, it is referred to as "Ferrer".
- **EFPIA:** European Federation of Pharmaceutical Industries and Associations.
- **HCP:** Healthcare Professional.
- **HCO:** Healthcare Organisation.
- **PO:** Patient Organisation.
- **R&D:** Research and Development.

2. Scope of the publication / transparency report

2.1 Products

The transparency report refers to collaborations related to prescription-only medicinal products. Other product categories (for example, medicinal products advertised to the public or other products) are not included in this document.

2.2 Company

The publication applies to Ferrer Internacional and to transfers of value managed from Ferrer Internacional within the scope of the Spanish affiliate and the European territories in which it operates through that entity. On the corporate website, by selecting the Spain drop-down, the direct interactions or interactions carried out through third parties that involve transfers of value made by Ferrer to HCPs who carry out their professional activity or have their main professional address in the EFPIA area are displayed, as well as transfers to HCOs and POs with a place of incorporation worldwide, in accordance with the criteria of this note.

The publications corresponding to other European affiliates or territories are displayed in their respective drop-down menus only where there is a legal obligation, applicable local regulation or a specific publication criterion requiring this.

In 2025 there were no changes of name, mergers or corporate integrations that should be reflected in this section.

2.3 Excluded transfers of value

Transfers that do not fall within the scope of the report or that do not generate a cost ultimately borne by Ferrer are excluded from the publication or are not included in the corresponding category. In particular:

- Transfers not related to prescription-only medicinal products.
- Planned transfers that ultimately do not take place and do not generate associated expenses for Ferrer.
- Costs cancelled in time and without any associated cost for Ferrer, such as cases where an HCP does not attend a congress.
- Logistics, construction or design costs associated with stands, symposia or other participation in congresses, where they do not constitute a reportable transfer of value to the recipient.

2.4 Date of transfers of value

Collection is carried out by calendar year. For the 2025 publication, transfers accrued between 1 January and 31 December 2025 will be used as reference, with publication within six months following the end of the year. The information will remain published on a cumulative basis until three full years are available; thereafter, the first year will be replaced by the fourth year, and so on.

Time allocation criteria:

- Scientific events: the start date of the event recorded in the data collection system is used.

- Professional fees linked to the provision of training services: the start date of the associated scientific event is used.
- Professional fees for advisory services or other activities not linked to a scientific event: the start date of the payment processing for the service provided is used.
- Donations: the date of the collaboration is used as reference.

These criteria seek to ensure compliance with the accrual accounting principle for the interaction.

2.5 Direct transfers of value

These are transfers made directly by Ferrer, where applicable, to the beneficiary without an intermediary. They are published in the relevant category according to their nature: donation, collaboration in scientific meetings, provision of services, R&D or another applicable category.

2.6 Indirect transfers of value

These are transfers made by third parties engaged by Ferrer or acting on its behalf, where the relevant entity identifies or can identify the recipient. For publication purposes, indirect transfers are treated in the same way as transfers made directly.

When intermediaries are engaged to organise scientific events or manage payments to HCPs, HCOs or POs, a contract is signed in which such intermediaries undertake to comply with the legislation in force and the applicable Code, passing this obligation on to the recipients engaged by them where appropriate.

2.7 Non-monetary transfers of value (in kind)

In-kind transfers are included when they constitute a reportable transfer of value. In such transfers, the value will be determined according to the market price or the corresponding calculation criterion, always respecting the legislation or codes applicable depending on the type of product. Where there are no in-kind transfers in the relevant year, this section shall be understood as not applicable for the purposes of the annual publication. In 2025, there were no in-kind transfers of value.

2.8 Transfers arising from partial participation, cancellation and reimbursement

Where a transfer of value has been planned for an HCP's attendance at a congress, such as registration, travel or accommodation, and the HCP is ultimately unable to attend, the cancellation costs borne by Ferrer will be published where applicable. If the non-attendance is known sufficiently in advance and the booking is cancelled without associated cost, no amount will be published.

For other transfers that are not executed, such as fees or donations, no amount will be published if there is no associated expense. There is no specific differentiated rule for partial participation; therefore, the criterion of cost actually accrued or borne will apply. Under no circumstances are HCPs directly reimbursed for registration, travel or accommodation costs when these are managed by Ferrer or by its agencies/providers.

2.9 Cross-border activities or collaborations

This section sets out the rules applicable where a transfer of value managed from Ferrer affects recipients whose activity, main professional address or place of incorporation is outside Spain.

For HCPs, transfers relating to those who carry out their professional activity or have their main professional address in the EFPIA area are published, detailing the country of residence or professional address where applicable. For foreign HCOs and POs, transfers accrued from Ferrer are published when their place of incorporation is located anywhere worldwide, in accordance with the scope defined in this note and the applicable regulations.

European affiliates publish their national interactions in accordance with the applicable local regulations.

2.10 Research and Development

Transfers related to R&D comprise activities associated with the design or execution of preclinical studies, clinical trials and prospective post-authorisation studies, as well as amounts relating to fees, meetings and scientific events related to those studies. In accordance with Article 18 on Transparency of the Farmaindustria Code of Practice, these transfers are published in aggregate form.

As an exception, transfers of value to HCPs or HCOs related to retrospective observational studies involving medicinal products are published individually under the provision of services category, even where they may be R&D in nature.

2.11 Transfers of value published voluntarily

Ferrer may include in its publication transfers of value relating to HCPs who carry out their professional activity or have their main professional address in the EFPIA area, as well as to HCOs and POs with a place of incorporation worldwide.

This publication reflects Ferrer's commitment to transparency. However, where such transfers are subject to transparency obligations arising from the EFPIA Code, the applicable national Code or the relevant local regulations, they will be considered to have been published in compliance with those obligations and not merely as a voluntary publication.

3. Specific considerations

3.1 Unique identification code

HCP information is collected through a syndicated database provided by a third party that meets legal requirements and is used by most companies in the sector. Each HCP interacting with Ferrer has a personal and unique code linked to that database. This database includes only HCPs practising in Spain; for foreign HCPs, Ferrer has its own database.

To include data relating to transfers of value, the HCP will have previously received information on their publication through a document that includes their name, address, NIF

and the remaining headings that will be published, as well as information on exercising data protection rights. The NIF is published in masked form for natural persons, for example in the format xxx1234xx.

In the case of HCOs and POs, Ferrer has its own file in which each organisation is identified with its data and CIF. This file, which includes Spanish and non-Spanish HCOs and POs, is reviewed periodically.

3.2 Self-employed Healthcare Professional

The Code of Practice for the Pharmaceutical Industry establishes, as a general principle, the obligation to publish individually all Transfers of Value made directly or through third parties to Healthcare Professionals. Accordingly, and in view of that principle, Article 18.1 of the Code provides that, to the extent legally possible and provided that it can be done accurately and consistently, pharmaceutical companies must publish Transfers of Value made to Healthcare Organisations at individual level, identifying the Healthcare Professional (instead of the Healthcare Organisation).

3.3 Contracts with a duration exceeding one year

For contracts with a duration exceeding one year, Ferrer will publish in each financial year the amount corresponding to the accrual for the relevant calendar year, taking into account the type of contract and the time allocation criteria described in section 2.4. Where a multi-year contract includes different milestones, activities or payments, each transfer will be allocated to the financial year in which the corresponding activity, service or transfer accrues. For events, provision of services, donations and R&D, the specific date and accrual criteria set out in section 2.4 will apply.

3.4 Country-specific characteristics

The interactions carried out by Ferrer with HCPs, HCOs and POs are governed by the Farmaindustria Code of Practice, which transposes the EFPIA regulations and aligns the Spanish self-regulatory system with the other European systems in matters relating to the promotion of prescription-only medicinal products and interactions with HCPs and HCOs. The Farmaindustria Deontological Supervision Unit oversees compliance with the Code.

Specific aspects:

- Scientific and professional events organised by third parties must be evaluated by Farmaindustria before Ferrer can collaborate.
- Events must be exclusively scientific-professional in nature; entertainment elements, leisure activities and hospitality for accompanying persons are not permitted.
- Events will not be organised or sponsored outside Spain unless there is a logistical or scientific justification, for example where most participants come from abroad or where the relevant resource or expertise is located abroad.
- When Ferrer sponsors the attendance of more than 20 HCPs at a congress involving at least one overnight stay, it will notify Farmaindustria of the sponsorship in advance.
- When a provision of services involves the remunerated participation of more than 10 HCPs, Ferrer will notify Farmaindustria of the service in advance for approval before commencing the engagement and execution.

- Accommodation must be limited to the days of the event and, as a general rule, to hotels of no more than four-star category, except for exceptions accepted by Farmaindustria.
- Travel must be limited to the days of the event, without accompanying persons, and must be in economy class except in exceptional cases permitted by the applicable regulations.

3.5 Review or audit of information quality

Before publication, the information on transfers of value to HCPs, HCOs and POs related to prescription-only medicinal products contained in the system is verified. If any personal data is missing or a possible inconsistency or error is detected, the HCO, PO or HCP is contacted to supplement or verify the information, with the aim of ensuring that publications are as accurate as possible.

Ferrer has an IT platform that collects transfers of value to HCPs, HCOs and POs and an internal approval flow in which it is verified that the request complies with the requirements of the Farmaindustria Code of Practice. There are also internal controls to approve engagements, sponsorships, donations and other interactions before their execution.

4. Personal data protection. Legal basis

4.1 Request for consent, withdrawal of consent and partial consent

In accordance with Report No. 2016-0172 - Ref. 143318/2016 - of 22 April 2016 issued by the Legal Department of the Spanish Data Protection Agency, Ferrer does not base the individual publication of transfers of value made to HCPs on their express consent, but rather on the applicable legitimate interest in accordance with the criteria set out in the following section.

4.2 Legitimate interest, balancing test and right to object

The individual publication of transfers of value made to HCPs is based on the legitimate interest of Ferrer and the pharmaceutical sector, insofar as it serves legitimate purposes of transparency, integrity and public trust. In particular, it helps reduce the risk of perceived undue influence, promotes a culture of integrity in relationships with HCPs and strengthens public and patient trust in the independence of those professionals. This criterion has been recognised by the Spanish Data Protection Agency, which considers that such publication may be supported by legitimate interest, provided that proportionate measures and appropriate safeguards are applied.

For these purposes, Ferrer applies minimisation and proportionality measures, publishing only the data necessary to fulfil the purpose of transparency and avoiding excessive breakdown of the information. Ferrer also informs healthcare professionals about the publication of their data and about exercising their rights in relation to data protection, including the right to object where there are grounds relating to their particular situation. Ferrer also adopts measures aimed at preventing subsequent uses incompatible with the purpose of transparency, including indexing by search engines.

5. Information collection template

5.1 Publication date

The publication is made annually, within six months following the end of each calendar year.

5.2 Publication platform

Data relating to transfers of value made by Ferrer, directly or indirectly, are published on Ferrer's corporate website. The Spain drop-down shows the interactions corresponding to Ferrer. European affiliates with their own publication show their national interactions in their respective drop-down menus.

5.3 Language of publication

The information is published in Spanish and English.

6. Published economic and financial information

6.1 Currency

The publication currency is the euro. When a transaction occurs in a currency other than the euro, the exchange rate published by the European Central Bank on the registration date and the payment exchange rate at the time of payment will be applied, with any exchange difference being recorded in the financial statements.

6.2 Taxes included or excluded

Published transfers of value are presented as gross amounts. Gross amount means the total value before discounts or associated taxes are applied; the net value corresponds to the result after deducting taxes and other charges, such as VAT and personal income tax withholding, where applicable.

Accordingly, the published figure may differ from the amount actually received by the HCP or HCO. VAT is added to the gross amount where applicable and personal income tax withholding is deducted for transfers of value made to HCPs, in accordance with applicable tax regulations.

Example: if the fees of an HCP as a speaker amount to 100 euros gross, 21% VAT is added to the amount and 15% personal income tax withholding is deducted. The amount published in the report will be 100 euros, while the total amount received by the professional will be 106 euros.

6.3 Calculation rules

The calculation rules are applied according to the nature of the transfer of value:

- Gross amounts: all transfers are published at their gross value, without prejudice to the subsequent application of taxes or withholdings.
- In-kind transfers: they are valued according to the market price or the objective criterion corresponding to the good, product, material or service delivered.
- Events with several sponsored HCPs: transfers are allocated individually. The provider reports the unit costs of tickets, accommodation and registration fees associated with each HCP.

- Registration fees: the amounts set by the HCO organising the congress or by its official secretariat are published; these may vary according to the HCP's status (for example, HCO member or resident). Ferrer does not directly reimburse the HCP for the registration fee.
- Event sponsorships with invitations or registrations assignable to HCPs: where sponsorship of an HCO or PO includes invitations, registrations or other participation rights for identified HCPs, the value attributable to each HCP will be separated and published under the corresponding heading where it can be individualised. The remaining amount will be published as sponsorship or collaboration to the organising or beneficiary HCO or PO, according to the available documentation and the applicable criterion.
- Travel and accommodation: the cost borne by Ferrer or by its approved agencies is published, limited to the days of the event and in accordance with Farmaindustria criteria. No direct reimbursement is made to the HCP.
- Event sponsorships: when Ferrer pays the sponsorship to the official secretariat, the transfer is published in the name of the HCO that organises the congress, even if that HCO does not receive the payment directly from Ferrer.
- Provision of services: fees must be based on market criteria, be commensurate with the time spent, the work performed and the responsibilities assumed, and be paid in monetary form.
- Research and Development: transfers are published in aggregate form, except for retrospective observational studies, which are published under provision of services where applicable.

7. Additional information

7.1 Ferrer's commitment to transparency

Gaining society's trust is key for Ferrer. Therefore, Ferrer publishes its interactions with healthcare professionals, healthcare organisations and patient organisations as part of its commitment to transparency and continuous improvement in relationships with third parties.

The published interactions are necessary and legitimate for the sector, as they contribute to research and scientific training, facilitate better knowledge of diseases and available treatments, and enable the pharmaceutical industry to incorporate the experience and knowledge of HCOs and HCPs into pharmaceutical research.

Ferrer's mission to advance society's well-being affects both the way it works and the activities promoted in the fields of corporate social responsibility, patient support, training of healthcare professionals, local projects and environmental sustainability.

7.2 Reference documents

- EFPIA Disclosure Code.
- Farmaindustria Code of Practice for the Pharmaceutical Industry.
- Ferrer Privacy Policy, in relation to the processing of personal data.

7.3 Legal notice on the publication procedure

Ferrer uses a combination of automated systems, standardised procedures and manual data entry by internal and external resources to collect the relevant information and subsequently publish it. The published information reflects Ferrer's good faith in complying with the provisions of Article 18 of the Farmaindustria Code of Practice for the Pharmaceutical Industry.

If, despite best efforts to ensure that the publication faithfully reflects the transfers of value made, correct or complete information has not been included, Ferrer will investigate the case and provide an appropriate response where the information is incorrect, in accordance with the prior verification and exercise of rights procedures described in this note.

The information published in accordance with the requirements of the Code will be used solely for the purpose of complying with its provisions. HCPs or HCOs who consult the published data will be subject to