

Tillotts Pharma Transfers of Value in 2025 to Austrian Healthcare Professionals and Healthcare Organisations

COC - ORDINANCE ON ARTICLE 9 - STANDARDIZED TEMPLATE FOR THE DOCUMENTATION OF DATA TO BE DISCLOSED

DATA DOCUMENTATION - ARTICLE 9 COC (TRANSPARENCY)

Reporting period (calendar year): 2025

Date of publication: June 2026

	Name (cf. Article 9.4 CoC)	Practice or business address		Where available: physician number commercial register number, association register number	Financial or material donations as well as subsidies	Transfers of value granted in connection with events (cf. Article 9.4a 1) (i), (ii) CoC and/or Article 9.4b 2) (i), (ii), (iii) CoC)			Fees for services rendered and consulting provided (cf. Article 9.4a 2) CoC and/or Article 9.4b 3) CoC)		TOTAL		
		(cf. Article 9.4 CoC)	(cf. Article 9.4 CoC)	(cf. Article 9.4 CoC)	(cf. Article 9.4 CoC)	(cf. Article 9.4b 1) CoC)	Support of institutions or third parties appointed by such organizations for implementing the event	Admission and attendance fees	Travel costs and costs for overnight accomodation	Fees		Expenses	
HCPs	Dr. Anna Pribasnič	Austria	Universitätsklinikum nSt. Pölten Dunant Platz 1	3100 St-Pölten				390.00 €	1'262.95 €			1'652.95 €	
	Dr. Erich Pawelka	Austria	Ordination Mödling Hauptstrasse 36	2340 Mödling				606.00 €		4'053.00 €		4'659.00 €	
	Dr. Houssam Hanash	Austria	Ordensklinikum Linz Seilerstätte 4	4010 Linz					887.84 €			887.84 €	
	Dr. Julian Prosenz	Austria	Uni Klinikum St.Pölten Dunant-Platz 1	3100 St.Pölten				816.00 €	1'284.10 €			2'100.10 €	
	Dr. Lukas Antonitsch	Austria	Universitätsklinikum Wiener Neustadt Corvinusring 3-5	2700 Wiener- Neustadt				370.80 €				370.80 €	
	Dr. Mary Rose Reithofer	Austria	Klinik Donaustadt Langobardenstrasse 122	1220 Wien				816.00 €	1'284.10 €			2'100.10 €	
	Dr. Matthias Robl	Austria	Klinikum Wels-Grieskirchen Grieskirchnerstrasse 42	4600 Wels				816.00 €	1'329.53 €			2'145.53 €	
	Dr. Sabrina Lichtenegger	Austria	Landeskrankenhaus Weiz Franz-Pichler-Strasse 85	8160 Weiz					665.88 €			665.88 €	
	Dr. Ulrike Itzlinger-Monshi	Austria	Klinik Landstrasse 4 Junchgasse 25	1030 Wien				816.00 €	1'274.59 €			2'090.59 €	
AGGREGATE DISCLOSURE FOR HEALTHCARE PROFESSIONALS													
Total amount								10'518.80 €	16'567.09 €	6'150.00 €	0	33'235.89 €	
Total number of recipients of transfers of value by subtype								17	17	3	0	37	
% of total transfers of value to all HCP recipients by subtype								70.83%	70.83%	75.00%	0%	71.15%	
INDIVIDUAL NAMED DISCLOSURE FOR HEALTHCARE INSTITUTIONS [one row per HCI, with all transfers of value for the reporting period summed up]													
HCOs	European Crohn's and Colitis Organisation	Austria	Ungargasse 6/13	1030 Vienna			700.00 €	11'814.14 €				12'514.14 €	
	Medizinische Universität Innsbruck, Universitätsklinik für Innere Medizin I	Austria	Christoph Probst Platz 1, Innrain 52	6020 Innsbruck			4'420.00 €					4'420.00 €	
	Österreichische Akademie der Ärzte GmbH	Austria	Walcherstraße 11/23	1020 Vienna			3'734.00 €					3'734.00 €	
	Österreichische Gesellschaft für Gastroenterologie & Hepatologie (ÖGGH)	Austria	Freyung 6	1010 Vienna			10'229.00 €					10'229.00 €	
	Österreichische Gesellschaft für Infektionskrankheiten und Tropenmedizin (OEGIT)	Austria	Seidengasse 9	1070 Vienna			1'975.00 €					1'975.00 €	
	United European Gastroenterology	Austria	Wickenburggasse 1	1080 Vienna			122'050.00 €	12'948.24 €				134'998.24 €	
	AGGREGATE DISCLOSURE FOR HEALTHCARE INSTITUTIONS												
Total amount							0	13'900.00 €	0	0.00	N/A	N/A	13'900.00 €
Total number of recipients of transfers of value by subtype							0	2	0	0.00	N/A	N/A	2
% of total transfers of value to all HCI recipients by subtype							0%	25%	0%	0.00	N/A	N/A	25%
AGGREGATE DISCLOSURE FOR RESEARCH & DEVELOPMENT													
R & D	Transfers of value granted in connection with research & development, cf. Article 9.3a CoC											Total	
<p>The rules referred to are those set out in the Pharmig Code of Conduct (CoC) HCP = healthcare professional within the meaning of Article 3 CoC HCI = healthcare establishments, organizations or institutions within the meaning of Article 8.4 CoC R&D = research and development The reporting period is the calendar year</p>													

Tillotts Pharma AG (“**Tillotts**”) Methodological note for HCP /HCO disclosure 2025 in Austria (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 Article 9 of the Pharmig Code of Conduct (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): Members of the medical, dental, pharmacy and nursing professions and any other persons who in the course of their professional activities may administer, prescribe, purchase, recommend or supply a medicine.

Healthcare organisations (HCOs): Either a healthcare, medical or scientific association or organisation such as a hospital, clinic, foundation, university or other address, place of incorporation or primary place of operation is in Europe or an organisation through which one or more health professionals or other relevant decision makers provide services.

Where a Recipient is confirmed as deceased before publication, Tillotts follows the guidance, on publishing data about deceased health professionals, to determine whether the ToVs remain individually disclosed or must be aggregated according to the Code.

1.2 Kind of ToVs

Transfers of Value ("**ToV**") include

- Contribution to costs and support for HCPs to attend educational events and meetings,

- 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
- Fees for service and consultancy (honoraria)
- 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 medicines. Tillotts does not market over-the-counter medicines in the Territory. 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

- Over-the-counter medicines
- Medical samples
- Meals, as long as the thresholds according to EFPIA and/ or applicable to the Code scorecard for meals and hospitality are met,
- Ordinary course purchases and sales of products between Tillotts and Recipients

Transfers to patient organisations are also out of scope for this methodological note and are disclosed separately where required.

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 that do not involve direct financial payment, such as the provision of staff time or other non-financial resources delivered as part of collaborative activities. These transfers are disclosed at the value of the benefit provided.

The value of non-monetary ToVs is calculated using either the third-party invoiced amount where applicable, or internal cost estimation based on hourly rates of personnel involved, multiplied by hours contributed.

2.8 ToVs in case of partial attendances or cancellation and refund

Tillotts keeps attendance records for all HCPs supported to participate in congresses and meetings. Transfers of Value (ToV) are disclosed on an individual basis (or in aggregated form where the HCP has opted out) only where the HCP has actually attended the event and thereby received a benefit in kind. If an HCP does not attend and certain costs (e.g. non-refundable accommodation) are nevertheless incurred by Tillotts, the associated ToV is disclosed exclusively in aggregated form.

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 & Development Transfers of Value are disclosed aggregated and encompass Transfers of Value to Recipients in the Territory health professionals and UK health care organisations related to non-clinical studies (as defined in the OECD Principles of Good Laboratory Practice), clinical trials (as defined in Regulation 536/2014), non-interventional studies (prospective in nature and involving the collection of data from, or on behalf of, individual or groups of health professionals specifically for the study), as well as costs that are subsidiary to these activities.

2.11 Voluntary disclosure

Tillotts discloses all ToVs on a voluntary basis in the Territory, since Tillotts has not signed the Pharma Cooperation Code in the Territory.

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. Internally, HCP and HCO details are cross-checked using the individual's name, primary place of practice, contract details and records held within Tillotts' customer relationship management system or Compliance management tool. No commercial identifiers are published as part of the disclosure.

3.2 Self-incorporated HCP

Where an HCP provides services through their own limited company or organisation, Tillotts the Transfer of Value against the individual HCP rather than the company, in line with the Code. If the HCP does not permit individual disclosure for contracted services, the relevant transfers are included in the aggregate total.

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 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 patient organisations do not require consent.

Transfers to HCOs do not require consent.

Cross-border processing is carried out under appropriate safeguards.

5. Form of disclosure

5.1 Date of publication

30/06/26

5.2 Disclosure platform

The disclosure data will be published on the website of Tillotts Pharma, www.tillotts.com.

5.3 Disclosure language

English and German

6. Disclosure financial data

6.1 Currency

All disclosures are reported in Euros (EUR). Where payments were originally made in another currency, Tillotts converts the amount into Euros 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 unless VAT is irrecoverable, in which case the gross amount is disclosed.

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.