

JULKISTAMISEN MALLIPOHJA

Julkistamisajankohta: 2026-06-30

(Sukunimi, etunimi) nimi	Koko	Pääasiallinen toimipaikka ja/tai rekisteröintipaikka:	Pääasiallinen toimipaikka ja/tai rekisteröintipaikka: Maa	Pääasiallinen toimipaikka ja/tai rekisteröintipaikka: Osoite	Tapahtumakustannuksiin osallistuminen (125 §/1.b)		Palvelu- ja konsulttipalkkiot (125 §/1.c)		YHTEENSÄ VALINNAINEN (EUR)
					Rekisteröintikulut	Matka- ja majoituskulut	Palkkiot	Palvelu- ja konsulttisopimuksiin liittyvät muut kulut, mukaan lukien	
(124 §)		(124 §)	(124 §)	(124 §)					
YKSILÖTASOINEN JULKISTAMINEN - yksi rivi/terveydenhuollon ammattilainen (t.s. kaikki taloudelliset etuudet yhden vuoden aikana yhdelle vastaanottajataholle summataan, yksilöidyt euromääräiset summat voidaan pyynnöstä esittää vastaanottajalle ja/tai viranomaiselle)									
Susanna Polat	Kotka		Suomi	Ratamokeskus Sisätautien pkl Ruskeasuonkatu 3 45100 KOUVOLA		4931			4931
Kiviniemi Mikko	Kuopio University		Suomi	KYS Kuopion yliopistollinen sairaala KYS Sisätautien pkl PL 100 70029 KYS			800		800
Vepsäläinen Johanna	Oulu univ hospital		Suomi	OYS Oulun yliopistollinen sairaala OYS Vatsakeskus PL 20 900029 OYS	495	1129			1624
Ville Rantala	HUS		Suomi	Hyvinkään sairaala Hyvinkään sa Sisätautien vo PL585 00029 HUS	485	1129			1614
Jukka Koskela	HUS		Suomi	HUS Peijaksen sairaala Peijaksen sa Yhteisvo ja päiväos PL 900 00029 HUS	485	1129			1614
Marcus Riissanen	TAYS		Suomi	TAYS Tampereen yliopistollinen sairaala TAYS Gastroenterologia PL 2000 335 21 Tampere	485	1129			1614
Teppo Stenholm	TYKS		Suomi	TYKS U-sairaala TYKS U-sa Endokrinologian pkl PL 52 205 21 Turku	485	1129			1614
Markku Pajala	KYS		Suomi	KYS Kuopion yliopistollinen sairaala KYS Gastroenterologia PL 100 700 29 KYS	485	1157			1642
Arto Korhikoski	Kokkola KS		Suomi	Keski-Pohjanmaan keskussairaala Keski-Pohjanmaan ks Gastroenterologia F-siipi 1.krs Mariankatu 16-20 672 00 Kokkola	485	1129			1614
Joanna Kaulio	HUS		Suomi	Päijät-Hämeen keskussairaala Päijät-Hämeen ks Sisätautien pkl Keskussairaalankatu 7 158 50 Lahti	485	1129			1614
Lauri Salminen	Kotka		Suomi	Ratamokeskus Sisätautien pkl Ruskeasuonkatu 3 45100 KOUVOLA	485	1129			1614
Ville Kolmonen	Joensuu		Suomi	Pohjois-Karjalan keskussairaala Pohjois-Karjalan ks Vatsakeskus J2-talo pohjakerros Tikkamäentie 16 802 10 Joensuu	485	1129			1614
Riikka Mettälä	TAYS		Suomi	TAYS Tampereen yliopistollinen sairaala TAYS Gastroenterologia PL 2000 335 21 Tampere	1367	1632			2999

Karri Utriainen	TYKS	Suomi	TYKS Salon sairaala TYKS Salon sa Sisätautien pkl Sairaalan tie 9 241 30 Salo	1367	1632		2999
Olli-Pekka Pätsi	OYS	Suomi	OYS Oulun yliopistollinen sairaala OYS Vatsakeskus PL 20 900 29 OYS	1367	1765		3132
Milla Tauriainen	KYS	Suomi	KYS Kuopion yliopistollinen sairaala KYS Gastroenterologia PL 100 700 29 KYS	1367	1777		3144
Mikko Lahdenoja	TAYS	Suomi	TAYS Tampereen yliopistollinen sairaala TAYS Gastroenterologia PL 2000 335 21 Tampere	1367	1632		2999
Iiris Nyholm	OYS	Suomi	OYS Oulun yliopistollinen sairaala OYS Vatsakeskus PL 20 900 29 OYS	1371	1765		3136
Ilkka Vihriälä	Seinäjoen KS	Suomi	Seinäjoen keskussairaala Seinäjoen ks Sisätaudit D-osa 2 kerros Hanneksenrinne 7 602 20 SEINÄJOKI	830	1118		1948
Janne Rajala	Helsinki Aava	Suomi	Lääkärikeskus Aava Aava Helsinki Kamppi Annankatu 32 001 00 Helsinki	830	1027		1857
Petri Mäkelä	Turku	Suomi	Lääkärikeskus Aava Aava Turku Hansa Yliopistonkatu 20 301 00 TURKU	830	1027		1857
Paula karjalainen	Helsinki Aava	Suomi	Lääkärikeskus Aava Aava Helsinki Kamppi Annankatu 32 001 00 Helsinki	250	1120		1370
Julia Anttonen	OYS	Suomi	OYS Oulun yliopistollinen sairaala OYS Vatsakeskus PL 20 900 29 OYS	850	1774		2624
Jenni Mäki	Kuopio	Suomi	KYS Kuopion yliopistollinen sairaala KYS Lastentautien pkl PL 100 700 29 KYS	850	1628		2478
Maria Jansson	HUS	Suomi	HUS Uusi lastensairaala Uusi lastensairaala Lasten vastaanotot Uusi lastensairaala PL 347 000 29 HUS	850	1591		2441
Aino Lehti	Tampere	Suomi	TAYS Tampereen yliopistollinen sairaala TAYS Gastroenterologia PL 2000 335 21 Tampere sairaala TAYS Lastentaudit PL 272 335 21 Tampere	850	1591		2441
Satu Simell	Turku	Suomi	TYKS Majakkasairaala TYKS Majakkasa Lasten ja nuor vatsa ja s PL 52 205 21 TURKU	850	1351		2201
JAAKKO RAUTAKORPI	Turku	Suomi	TYKS A-sairaala TYKS A-sa Gastroenterologian pkl PL 52 205 21 TURKU	600	2971		3571
JOHANNA HAAPAMAKI	HUS	Suomi	HUS Meilahden tornisairaala Meilahden tornisa gastroenterologia PL 340 000 29 HUS	600	3057		3657
MIIKA VUORINEN	Kuopio	Suomi	KYS Kuopion yliopistollinen sairaala KYS Sisätautien pkl PL 100 700 29 KYS	600	3132		3732
Mikko Mattila	TAYS	Suomi	Terveystalo Oy Terveystalo Tampere Rautatienkatu Rautatienkatu 27 331 00 TAMPERE	600	2990		3590
RITVA KOSKELA	OYS	Suomi	OYS Oulun yliopistollinen sairaala OYS Vatsakeskus PL 20 900 29 OYS	600	3155		3755

Anne Mattila	Jyväskylä	Suomi	Keski-Suomen Sairaala Nova Sairaala Nova Kirurgian pkl Hoitajantie 3 406 20 JYVÄSKYLÄ			800			800
Juho Mattila	Turku	Suomi	TYKS A-sairaala TYKS A-sa Gastroenterologian pkl PL 52 205 21 TURKU			800			800
Minna Starck	Turku	Suomi	TYKS A-sairaala TYKS A-sa Gastroenterologian pkl PL 52 205 21 TURKU			300			300
Konsta Hakkarainen	Kuopio	Suomi	KYS Kuopion yliopistollinen sairaala KYS Sisätautien pkl PL 100 700 29 KYS			800			800
Hans Henricson	Kokkola	Suomi	Keski-Pohjanmaan keskussairaala Keski-Pohjanmaan ks Gastroenterologia F-siipi 1.krs Mariankatu 16-20 672 00 Kokkola			1129			1129
Anja Eberl	HUS	Suomi	HUS Jorvin sairaala HUS Jorvin sa Vatsakeskus PL 800 000 29 HUS			800			800
Eneli Katunin	TAUS	Suomi	Kanta-Hämeen keskussairaala Hämeenlinna Kanta-Hämeen ks Hml Sisätautien pkl Parantolankatu 6 13530 HÄMEENLINNA			800	99.6		899.6
Inka Koskinen	Jyväskylä	Suomi	Keski-Suomen Sairaala Nova Sairaala Nova Kirurgian pkl Hoitajantie 3 406 20 JYVÄSKYLÄ			800	76.4		876.4
									0
yhTEensä				23056	53984	7029	176		84245
<b>YHTEENVETOMUOTOINEN JULKISTAMINEN - (kun tietoja ei juridisista syistä voida julkistaa yksilötasolla)</b>									
<b>Vastaanottajien taloudellisten etuuksien kokonaissumma(*) - 126 §</b>									
<b>Vastaanottajien lukumäärä - 126 §</b>									
<b>Vastaanottajan saama %-osuus kaikkien vastaanottajien saamasta kokonaissummasta(*)</b>									
				%	%	%	%		
<b>YKSILÖTASOINEN JULKISTAMINEN - yksi rivi/terveydenhuollon organisaatio (t.s. kaikki taloudelliset etuudet yhden vuoden aikana yhdelle vastaanottajataholle summataan; yksilöidyt euromääräiset summat voidaan pyynnöstä esittää vastaanottajalle ja/tai viranomaiselle)</b>									
Terveystuollon organisaatiot	Suomen Gastrokirurgit	Helsinki	Suomi	c/o Duodecim, PL 713, 00101 Helsinki					2'800
	Suomen Lastenlääkäriyhdistys ry	Oulu	Suomi	PL 23, 90029 Oys					1500
	Suomen gastroenterologiyhdistys	Espoo	Suomi	Sinimäentie 10 B, 02630 Espoo					2800
									0
	jne				0	0	0	0	
<b>YHTEENVETOMUOTOINEN JULKISTAMINEN - (kun tietoja ei juridisista syistä voida julkistaa yksilötasolla)</b>									
<b>Vastaanottajien taloudellisten etuuksien kokonaissumma (**)- 126 §</b>									
<b>Vastaanottajien lukumäärä - 126 §</b>									
<b>Vastaanottajan saama %-osuus kaikkien vastaanottajien saamasta kokonaissummasta (**)</b>									
				%	%	%	%		
<b>YHTEENVETOMUOTOINEN JULKISTAMINEN</b>									

Tutkimukseen ja tuotekehitykseen liittyvät taloudelliset etuudet tulee julkistaa yhteenvedomuotoisesti kokonaissummina (128 §)

YHTE  
ENSÄ

VALINNAINEN

# Tillotts Pharma AB (“**Tillotts**”) Methodological note for HCP /HCO disclosure 2025 in Finland (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 the PIF Code (the “**Code**”) and forms part of the standardised EFPIA disclosure framework used for 2025 onward.

## **Contents**

<b>1. Definitions</b> .....	2
1.1 Recipients .....	2
1.2 Kind of ToVs .....	2
<b>2. Disclosure’s Scope</b> .....	3
2.1 Products concerned .....	3
2.2 Company concerned .....	3
2.3 Excluded ToVs.....	3
2.4 ToVs date.....	4
2.5 Direct ToVs.....	4
2.6 Indirect ToVs .....	4
2.7 Non-monetary ToVs .....	4
2.8 ToVs in case of partial attendances or cancellation and refund .....	4
2.9 Cross-border activities .....	5
2.10 R&D .....	5
2.11 Voluntary disclosure.....	5
<b>3. Specific considerations</b> .....	5
3.1 Country unique identifier .....	5

3.2 Self-incorporated HCP .....	5
3.3 Multi-year agreements .....	6
3.4 Country specificities.....	6
3.5 Quality Checks.....	6
<b>4. Data protection legal basis .....</b>	<b>6</b>
4.1 Consent collection .....	6
4.2 Legitimate interests .....	6
<b>5. Form of disclosure .....</b>	<b>7</b>
5.1 Date of publication .....	7
5.2 Disclosure platform.....	7
5.3 Disclosure language.....	7
<b>6. Disclosure financial data .....</b>	<b>7</b>
6.1 Currency.....	7
6.2 VAT included or excluded.....	7
6.3 Calculation rules .....	7
<b>7. Additional Information .....</b>	<b>8</b>

## 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 Finland 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
- 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. 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
- Medical Samples
- Information- and educational material and medical utility items

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 are disclosed only where the HCP actually attends and therefore receives a benefit in kind. If an HCP does not attend, no ToV is disclosed, even if certain costs (such as non-refundable accommodation) are charged to Tillotts, as no benefit was received by the individual. Where partial attendance occurs, only the portion of support actually used by the HCP is disclosed. Refunds or credit notes received by Tillotts are deducted from the relevant ToV.

## 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 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 is not a member of the PIF association 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 discloses the Transfer of Value against the individual HCP rather than the company, in line with the Code.

### 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

Tillotts does not use consent as the lawful basis for publishing individual-level data in Finland.

Transfers to HCOs do not require consent.

Cross-border processing is carried out under appropriate safeguards.

### 4.2 Legitimate interests

For Finland, Tillotts relies on legitimate interests pursuant to Article 6(1)(f) of the GDPR as the lawful basis for the processing and publication of individual-level Transfers of Value to Healthcare Professionals.

The disclosure of Transfers of Value is carried out in accordance with the PIF Code of Ethics and in the interest of transparency in interactions between the pharmaceutical industry and healthcare professionals. Tillotts has performed a legitimate interest assessment confirming that the interest in transparency outweighs any potential impact on the individual, taking into account the limited and professional nature of the data disclosed.

Healthcare Professionals are informed about the disclosure and the applicable legal basis through contractual arrangements and privacy notices. Individual Transfers of Value are therefore disclosed without the use of consent and are not subject to opt-out on data protection grounds.

## **5. Form of disclosure**

### **5.1 Date of publication**

30/06/26

### **5.2 Disclosure platform**

Tillotts webpage: [www.tillotts.com](http://www.tillotts.com)

### **5.3 Disclosure language**

Finnish

## **6. Disclosure financial data**

### **6.1 Currency**

All disclosures are reported in Euro (EUR) Where payments were originally made in another currency, Tillotts converts the amount into Euro 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**

N/A