

Tillotts Pharma AB - 2025

Date of publication: 30 June 2026 / Dagsetning birtingar: 30. júní 2026

Full Name / Nafn <i>(Art. 1.01)</i>	HCPs: City of Principal Practice / Sveitarfélag HCOs: City where registered / Sveitarfélag <i>(Art. 3)</i>	Country of Principal Practice / Land <i>(Schedule 1 / skilgreiningar / orðskýringar)</i>	Principal Practice Address / Aðsetur <i>(Art. 3)</i>	Unique country identifier / Kennitala <i>(Art. 3)</i>	Donations and Grants to HCOs / Stuðningur og styrkir til heilbrigðisstofnana, lögaðila eða rekstraraðila heilbrigðisþjónustu <i>(Art. 3.01.1.a)</i>	Contribution to costs of Events / Framlög vegna viðburða <i>(Art. 3.01.1.b & 3.01.2.a)</i>			Fee for service and consultancy / Þóknun vegna þjónustu og ráðgjafar <i>(Art. 3.01.1.c & 3.01.2.c)</i>		TOTAL SAMTALS
						Sponsorship agreements with HCOs / Kostunarsamningar við HCOs / third parties appointed by HCOs to manage an Event / Utanaðkomandi aðili tilnefndur af HCO til að skipuleggja viðburð	Registration Fees / Skráningargjöld	Travel, Accommodation and meals/ Ferðalög, gisting og máltíðir	Fees / Þóknun	Related expenses agreed in the fee for service or consultancy contract, including travel & accommodation relevant to the contract / Samningsbundin útgjöld	
INDIVIDUAL NAMED DISCLOSURE / EINSTAKLINGSBUNDNAR UPPLÝSINGAR - one line per HCP / Ein lína fyrir hvern heilbrigðisstarfsmann (i.e. all transfers of value during a year for an individual HCP will be summed up. Itemization should be available for the individual Recipient or public authorities' consultation only, as appropriate. Tilgreina skal heildarupphæð ársins. Nánari sundurlitun aðeins aðgengileg viðtakanda eða viðeigandi yfirvöldum).											
Sigrun Maria Valsdóttir	Reykjavík	Iceland	Læknastodin Glæsibær Alfheimar 74 108 Reykjavík			95	1'122				1217 EUR
Alda Tholl Víkitorsdóttir	Reykjavík	Iceland	Læknastodin Glæsibær Alfheimar 74 108 Reykjavík			95	1'122				1217 EUR
OTHER, NOT INCLUDED ABOVE-ANNAD, EKKI INNIFALID HÉR AÐ OFAN (where information cannot be disclosed on an individual basis for legal reasons / upphæð sem ekki hefur fengist samþykki til að birta á nafn)											
Aggregate amount attributable to transfers of value to such Recipients / Samanlögð upphæð greiðslna til þeirra sem ekki samþykkja birtingu á nafn - <i>Art. 3.02</i>											
Number of Recipients in aggregate disclosure / Fjöldi viðtakenda sem ekki samþykkja birtingu á nafn - <i>Art. 3.02</i>											
% of the number of Recipients included in the aggregate disclosure in the total number of Recipients disclosed / Hlutfall viðtakenda sem ekki samþykkja birtingu á nafn - <i>Art. 3.02</i>											
INDIVIDUAL NAMED DISCLOSURE - one line per HCO / UPPLÝSINGAR TENGÐAR NEFNDUM HEILBRIGÐISSTOFNUNUM, LÖGADILUM EÐA REKSTRARAÐILUM HEILBRIGÐISÞJÓNUSTU - ein lína fyrir hverja heilbrigðisstofnun, lögaðila eða rekstraraðila heilbrigðisþjónustu (i.e. all transfers of value during a year for an individual HCO will be summed up; itemization should be available for the individual Recipient or public authorities' consultation only, as appropriate. Tilgreina skal heildarupphæð ársins. Nánari sundurlitun aðeins aðgengileg viðtakanda eða viðeigandi yfirvöldum).											
OTHER, NOT INCLUDED ABOVE-ANNAD, EKKI INNIFALID HÉR AÐ OFAN (where information cannot be disclosed on an individual basis for legal reasons / upphæð sem ekki hefur fengist samþykki til að birta á nafn)											
Aggregate amount attributable to transfers of value to such Recipients / Samanlögð upphæð greiðslna til þeirra sem ekki samþykkja birtingu á nafn - <i>Art. 3.02</i>											
Number of Recipients in aggregate disclosure / Fjöldi viðtakenda sem ekki samþykkja birtingu á nafn - <i>Art. 3.02</i>											
% of the number of Recipients included in the aggregate disclosure in the total number of Recipients disclosed / Hlutfall viðtakenda sem ekki samþykkja birtingu á nafn - <i>Art. 3.02</i>											
R&D - Rannsóknir og þróun											
AGGREGATE DISCLOSURE / SAMANLÖGÐ UPPHÆÐ											
Transfers of Value re Research & Development as defined in Article 3.04 and Schedule 1 / Framlög til rannsókna og þróunar eins og skilgreint er í grein 3.04 og með vísan til skilgreininga og orðskýringa.											

HCP: Health Care Professional / Heilbrigðisstarfsmaður

HCO: Health Care Organisation / Heilbrigðisstofnun, lögaðili, rekstraraðili heilbrigðisþjónustu

Tillotts Pharma AB (“**Tillotts**”) Methodological note for HCP /HCO disclosure 2025 in Iceland (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 carried out in accordance with the EFPIA Disclosure Code and forms part of the standardised EFPIA disclosure framework used for 2025 onward.

Contents

1. Definitions	2
1.1 Recipients	2
1.2 Kind of ToVs	2
2. Disclosure’s Scope	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
3. Specific considerations	5
3.1 Country unique identifier	5

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

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. 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 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 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 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 is not a member of the EFPIA association.

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.

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. 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 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

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.

4.2 Legitimate interests

N/A

5. Form of disclosure

5.1 Date of publication

30/06/26

5.2 Disclosure platform

Tillotts company webpage: www.tillotts.com

5.3 Disclosure language

Icelandic and English

6. Disclosure financial data

6.1 Currency

All disclosures are reported in Euro. 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

No additional methodological considerations apply.