

Tillotts Pharma AB, Transfer of Value in 2025 to Norwegian Healthcare Professionals and Healthcare Organisations

Date of publication: 2026-06-30

Full Name  (Art. 1.01)	HCPs: City of Principal Practice HCOs: city where registered  (Art. 3)	Country of Principal Practice  (Schedule 1)	Principal Practice Address  (Art. 3)	Donations and Grants to HCOs (Art. 3.01.1.a)	Contribution to costs of Events (Art. 3.01.1.b & 3.01.2.a)			Fee for service and consultancy (Art. 3.01.1.c & 3.01.2.c)		TOTAL (NOK)
					Sponsorship agreements with HCOs / third parties appointed by HCOs to manage an Event	Registration Fees	Travel & Accommodation	Fees (NOK)	Related expenses agreed in the contract, including travel & accommodation relevant to the contract	
<b>INDIVIDUAL NAMED DISCLOSURE - one line per HCP (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)</b>										
Linn Bernklev	LØRENSKOG	Norway	Akershus universitetssykehus Nordbyhagen Medisinsk divisjon - gastromed seksjon Postboks 1000 1478 LØRENSKOG	N/A	N/A			18'000		18 000
Kristine Wiencke	Oslo	Norway	Oslo universitetssykehus HF Rikshospital Klin kir -avd transpl med - gastroseksj Postboks 4950 Nydalen 0424 Oslo	N/A	N/A			24'000		24 000
Uzma M. Aslam	LØRENSKOG	Norway	Akershus universitetssykehus Nordbyhagen Medisinsk divisjon - gastromed seksjon Postboks 1000 1478 LØRENSKOG	N/A	N/A			12'000		12 000
Gøri Perminow	Oslo	Norway	Oslo universitetssykehus HF Ullevål Barne- og ungdomsklin - barnemed avd Postboks 4950 Nydalen 0424 Oslo	N/A	N/A			15'000		15 000
Knut Lundin	Oslo	Norway	Oslo universitet, Postboks 1072 Blindern 0316 Oslo	N/A	N/A			15'000		15'000
Håvard Midgard	Oslo	Norway	Oslo universitetssykehus HF Ullevål Barne- og ungdomsklin - barnemed avd Postboks 4950 Nydalen 0424 Oslo	N/A	N/A			15 000	516	15 516
<b>OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons</b>										
Aggregate amount attributable to transfers of value to such Recipients				N/A	N/A			kr 6'050.00		6050
Number of Recipients in aggregate disclosure				N/A	N/A			1		

	% of the number of Recipients included in the aggregate disclosure in the total number of Recipients disclosed - Art. 3.02				N/A	N/A			14%		
	<i>INDIVIDUAL NAMED DISCLOSURE - one line per HCO (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)</i>										
	Midt-Norsk Gastroenterologisk Förening	Levanger	Norway	Ankolmvegen 12, 7604 Levanger Org nr 990 931 232	N/A	N/A	16 000				16 000
HCOs	<i>OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons</i>										
	Aggregate amount attributable to transfers of value to such Recipients										
	Number of Recipients in aggregate disclosure										
	% of the number of Recipients included in the aggregate disclosure in the total number of Recipients disclosed - Art. 3.02										
	<i>AGGREGATE DISCLOSURE</i>										
R & D	N/A										TOTAL ANNUAL AMOUNT

# Tillotts Pharma AB (“**Tillotts**”) Methodological note for HCP /HCO disclosure 2025 in Norway (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 LMI Code (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 Norway or an organisation through which one or more health professionals or other relevant decision makers provide services.

### 1.2 Kind of ToVs

Transfers of Value (“**ToV**”) include

- 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
- Information- and educational material and medical utility items
- Medical Samples

In instances where Tillotts contributed to the payment of a fee for service or consultancy of a Norwegian HCP as part of a consortium of pharmaceutical companies in Norway, with the payment to the HCP being made by another pharmaceutical company, such other pharmaceutical company contractually agreed to disclose the total of such payments according to the LMI Rules, and therefore Tillotts Pharma is making no disclosures related to these instances of services/consultancy.

Transfers to patient organisations are 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, such as travel, accommodation or registration fees paid directly by Tillotts. These transfers are disclosed at the value of the cost incurred.

## 2.8 ToVs in case of partial attendances or cancellation and refund

Transfers of Value are only reported for services and activities that have actually been performed. No disclosure is made for cancelled or non-attended services for which no payment has been made.

## 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 LMI 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.

## 3.2 Self-incorporated HCP

Where an HCP provides services through their own limited company or organisation, and the services are of a personal nature, the Transfer of Value is disclosed against the individual Healthcare Professional, in line with the LMI Code of Practice.

## 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 Norway, but legitimate interest.

Transfers to HCOs do not require consent.

Cross-border processing is carried out under appropriate safeguards.

### 4.2 Legitimate interests

For Norway, 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 required under the LMI Code of Practice and is carried out 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 company webpage: [www.tillotts.com](http://www.tillotts.com)

## 5.3 Disclosure language

English

# 6. Disclosure financial data

## 6.1 Currency

All disclosures are reported in Norwegian krona (NOK). Where payments were originally made in another currency, Tillotts converts the amount into NOK 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