

Fresenius Kabi Limited and Calea UK Limited: Methodological note for HCP/ORDM/HCO disclosure 2025

Data year:2025

Year of publication: March 2026

In accordance with ABPI requirements, Fresenius Kabi Limited and Calea UK Limited (**Fresenius Kabi UK**) ensure that the nature and scope of any Transfers of Value with healthcare professionals and healthcare organisations are clear and transparent. This Methodological Note is in the optional format provided by the PMCPA to meet the new structure requirements required by the EFPIA.

This Methodological Note provides guidance on how Fresenius Kabi UK have collected and reported this information. We have published Transfers of Value paid directly or indirectly for the period from 1 January 2025 to 31 December 2025.

Fresenius Kabi UK is a non-member company of the ABPI but has agreed to comply with the Code. This note summarises the methodologies used by Fresenius Kabi in preparing Disclosures in compliance with the EFPIA Code of Practice and the ABPI Code of Practice.

Transfers of Value made to Patient Organisations and members of the public are disclosed separately on the Fresenius Kabi GB website [Transparency Initiative - Fresenius Kabi Great Britain \(fresenius-kabi.com\)](https://www.fresenius-kabi.com/Transparency-Initiative).

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1. Definitions

1.1. Recipients

Healthcare Professional (HCP)	A member 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.
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Healthcare Organisation (HCO)	A healthcare, medical or scientific association or organisation such as a hospital, clinic, foundation, university or other teaching institution or learned society whose business address, place of incorporation or primary place of operation is in the UK, or an organisation through which one or more HCP or ORDMs provide services.
Other Relevant Decision Maker (ORDM)	Includes those with an NHS role who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply or use of any medicine but who are not health professionals.

1.2. Kind of ToVs

Transfers of Value means direct or indirect transfers of value, whether in cash, in kind or otherwise made, whether for promotional purposes or otherwise, in connection with the development or sale of medicines for prescribing for human use, or other products including enteral nutrition and medical devices.

ToV against HCPs & ORDMs

Fresenius Kabi UK discloses the following ToV it makes to HCPs & ORDMs:

- **Congress and educational event registration fees:** Expenses related to the registration of an HCP to attend a congress or educational event.
- **Travel:** Expenses relating to the provision of travel to HCPs or ORDMs in relation to a fee for service contract (e.g. rail travel, flights, reimbursement of private car miles) or to their attendance at an education event.
- **Accommodation:** Expenses related to the provision of overnight accommodation of HCPs or ORDMs in relation to a fee for service contract or to their attendance at an educational event.

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- **Accommodation:** Expenses related to the provision of overnight accommodation of HCPs or ORDMs in relation to a fee for service contract or to their attendance at an educational event.
- **Congress and educational event registration fees:** Expenses related to the registration of an HCP to attend a congress or educational event.

For certain Fresenius Kabi UK internally developed programmes and some events hosted virtually, we have disclosed a ToV using a value for a comparable course or event.

Where an HCP is not affiliated with an institution or healthcare organisation, any disclosure for that HCP has been disclosed on an aggregate basis.

ToV against HCOs

Fresenius Kabi discloses the following ToV it makes to HCOs:

- **Donations:** benefits in kind provide to HCOs for specific use.
- **Grants:** funding provided to HCOs in response to a request to support a specific activity for the purpose of supporting healthcare, scientific research or education.
- **Congress and educational event sponsorship:** expenses relating to the sponsorship of HCOs as congress organisers in exchange for benefits at an event (for example, rental of booths, a stand, hosting, advertisement space on programmes or banners), room hire or catering if paid on behalf of a HCO, as well as for the arrangement of educational events. This may include sponsorship of speakers at an event.
- **Fees:** ToV that are fees for the provision of services resulting from or related to contracts between Fresenius Kabi UK and organisations, or associations of Healthcare Professionals. Expenses relating to Fees may also be disclosed separately.

- **Collaborative or Joint Working:** Funding provided (or benefits in kind) as part of a project with an HCO aimed at enhancing patient care or is for the benefit of patients or alternatively benefits the NHS in line with the ABPI Code. Further details are here <https://www.fresenius-kabi.com/gb/company/responsibility/business-ethics>

Where a ToV have been made to the hospital or trust rather than the individual this has been recorded as a payment to an HCO. Fresenius Kabi UK discloses such transfer only once. |

2. Disclosure's Scope

2.1. Products concerned

Fresenius Kabi UK's products and services are broader than medicinal products for human use and include enteral nutrition products, homecare services and medical devices which are not subject to the Disclosure requirements. Fresenius Kabi UK have taken the decision to disclose ToV relating to all of its business streams. This both improves transparency and avoids attempting to isolate certain interactions. |

2.2. Company concerned

Fresenius Kabi Limited and Calea UK Limited |

2.3. Excluded ToVs

Fresenius Kabi does not include any free of charge products provided to HCOs under a commercial arrangement as these are out of scope. |

2.4. ToVs date

Disclosure considers whether the event or ToV took place within the reporting period 1 January 2025 – 31 December 2025. |

2.5. Direct ToVs

Direct ToV are those made directly by Fresenius Kabi UK for the benefit of a Recipient.

We pay fair market value for the provision of services. This may include services such as chairing or speaking at meetings and participating in advisory boards. Agreements are put in place and fees and any expenses are documented.

We may also reimburse registration, travel and accommodation expenses for HCPs to attend third party organised meetings or travel and accommodation expenses for Fresenius Kabi organised events. |

2.6. Indirect ToVs

These are ToV made on behalf of Fresenius Kabi UK for the benefit of a Recipient, or those made through a Third Party (for example, a marketing agency) or an HCO

and where Fresenius Kabi UK knows or can identify the Recipient that would benefit from the ToV. |

2.7. Non-monetary ToVs

|Where a ToV is non-monetary in nature, we may attribute a value to any such benefit in kind. |

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

|For partial attendance of Fresenius Kabi organised events, the cost of the event has been calculated on a pro-rata basis, based on the portion of the event attended. Where an HCP has been unable to attend an event, if the payment has already been made (including travel, accommodation and registration fees) then this is included in Disclosure. |

2.9. Cross-border activities

|All ToV made by Fresenius Kabi to UK HCPs/ORDMs and HCOs have been included as part of the Disclosure UK exercise irrespective of where the Fresenius Kabi entity is located (for example, ToV made by Fresenius Kabi entities outside of the UK). |

2.10. R&D

|Fresenius Kabi UK and Calea UK Limited are not reporting any R&D expenditure during 2025 |

2.11. Voluntary disclosure

|As set out above, Fresenius Kabi UK have taken the decision to include ToV above what is required under the ABPI Code, including those ToV related to enteral nutrition products, homecare services or medical devices. |

3. Specific considerations

3.1. Country unique identifier

|We have not used country unique identifiers to identify HCPs or HCOs|

3.2. Self-incorporated HCP

|Where an HCP has their own limited company, their ToV is disclosed against them as an individual HCP rather than an HCO. If their registered address is their home address, we have reported these figures in the aggregated section of the disclosure submission. |

3.3. Multi-year agreements

Where activities straddle a calendar year, the amounts paid for the activity carried out in the relevant year will be disclosed. |

3.4. Country specificities

Fresenius Kabi UK discloses ToV based on the HCP/HCO/ORDM's principal place of practice. |

3.5. Quality Checks

Fresenius Kabi carries out robust checks on all ToV. This includes relevant internal approvals prior to any contracting. Checks are carried out prior to any payment being made to ensure correct documentation and evidence is in place for each ToV. Compliance checks are then carried out on each ToV prior to completing the Disclosure exercise. |

4. Data protection legal basis

4.1. Consent collection

Agreements between Fresenius Kabi UK and HCPs/ORDMs have a section referring to Disclosure UK and transparency which sets out Fresenius Kabi UK disclosure obligations.

- For certain cross border events arranged by other Fresenius Kabi entities, consent has been obtained from HCPs to disclose; where this is not the case we report on an aggregated basis.
- Where HCPs communicate that they do not wish to disclose payment information, any such payments are reported on an aggregated basis. |

4.2. Legitimate interests

Fresenius Kabi UK rely on legitimate interests as the legal basis to process and share data information for disclosure purposes in line with the Fresenius Kabi UK Data Protection Statement which can be found at [Data Protection of Fresenius Kabi: Our Commitment.](#) |

5. Form of disclosure

5.1. Date of publication

30/06/26 |

5.2. Disclosure platform

www.disclosureuk.org.uk

5.3. Disclosure language

English

6. Disclosure financial data

6.1. Currency

GBP

6.2. VAT included or excluded

Where applicable, disclosure of payments do not in general include VAT. Cross border transfers of value may include VAT depending on the source.

6.3. Calculation rules

Transfers of value reflect fair market value, taking into account the nature of the services rendered, the amount of time spent and the knowledge and expertise of the HCP or ORDM.

For services provided outside of the United Kingdom, ToV are reported in £GBP. Where transfers of value have been reported to us in a foreign currency, amounts are converted to £GBP using a single annual exchange rate for each currency.

7. Additional Information

Where any issues are raised with reporting, we will review and any changes resulting from this review will be published in an updated report.

In case of any questions relating to this methodology, please contact:

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