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Proveca: Methodological note for HCP/ORDM/HCO disclosure 2025

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1 Definitions

1.1 Recipients

Proveca Pharma Ltd. engages in structured, transparent and compliant interactions with healthcare professionals (HCPs) and healthcare structures (referred to as ‘healthcare organisations [HCOs]’ for the purpose of this methodological note). These engagements are conducted for legitimate professional and scientific purposes and enable Proveca Pharma Ltd. to obtain independent expert advice in support of the highest standards of patient care. In accordance with the Farindustria Code of Practice, Proveca Pharma Ltd. defines a recipient as any HCP or organisation that carries out a profession or principal activity that has the main domicile or legal headquarters in Europe. Specifically, a HCP is defined as any person who carries out their activity in the medical sector, dentistry, public, private or hospital pharmacies, any nurses, administrators or staff of local health authorities, any technical or administrative personnel of public or private healthcare organisations and any other person within the scope of their professional activity that can prescribe, dispense, purchase or administer a medicinal speciality and that has their activity mainly in Europe. A HCO is defined as any structure whether it as an association or medical, scientific, healthcare or research organisation (independently from its legal form) such as hospitals, clinics, foundations, universities, specialisation and training schools that have their legal headquarters or main office, or activity in Europe.

1.2 Kind of ToVs

In the reporting period Proveca Pharma Ltd. carried out the following types of engagements with the recipients defined in section 1.1.

Sponsorship, including contributions to costs related to events/meetings is defined as a support provided by or on behalf of a company, when permitted by law, as a contribution to support an activity (including an event) performed, organised or created by a HCO, or a third party.

2 Disclosure’s Scope

2.1 Products concerned

Prescription only medicines (POMs).

2.2 Company concerned

Proveca Pharma Ltd.

2.3 Excluded ToVs

N/A.

2.4 ToVs date

The period covered by the disclosure submitted in 2026 started on January 1st, 2025, and ended on December 31st, 2025.

2.5 Direct ToVs

A direct ToV is defined as being made directly by a company for the benefit of a recipients. The activities conducted by Proveca Pharma Ltd. that constituted direct ToVs in this reporting period were fees for services, sponsorship and payments related to supporting HCPs to attend meetings/events.

2.6 Indirect ToVs

An indirect ToV is defined as one made by a company for the benefit of a recipient through an intermediate and where the company knows or can identify the recipient that will benefit from the ToV. The activities conducted by Proveca Pharma Ltd. that constituted indirect ToVs in this reporting period were sponsorship payments in relation to meetings/events.

2.7 Non-monetary ToVs

In the reporting period Proveca Pharma Ltd. carried out zero (0) non-monetary ToV.

2.8 ToVs in case of partial attendances or cancellation and refund

N/A.

2.9 Cross-border activities

N/A. In the reporting period, Proveca Pharma Ltd. did not identify any ToV arising from cross-border activities.

2.10 R&D

In the reporting period, Proveca Pharma Ltd. made no ToV relating to R&D activities in Italy.

2.11 Voluntary disclosure

N/A.

3 Specific considerations

3.1 Country unique identifier

N/A.]

3.2 Self-incorporated HCP

N/A. In the reporting period, Proveca Pharma Ltd. did not engage or contract any HCP, as defined in section 1.1, whose principal practice address resides in Italy.

3.3 Multi-year agreements

N/A. Proveca Pharma Ltd. have not entered into any multi-year agreements with HCPs or HCOs, registered in Italy, that are applicable to the reporting period.

3.4 Country specificities

N/A.

3.5 Quality Checks

Proveca Pharma Ltd. follows an internally defined process for the disclosure of ToVs relating to activities conducted in Italy and concerning Italian HCPs and HCOs. The process incorporates a formal review phase involving two appropriately trained employees. One employee is responsible for the preparation and completion of the disclosure materials in accordance with the Farindustria Code of Conduct and EFPIA requirements. The second employee independently reviews the materials to verify that the information disclosed is complete, accurate, and consistent with internal records prior to submission.

4 Data protection legal basis

4.1 Consent collection

N/A. In the reporting period, Proveca Pharma Ltd. did not engage or contract any HCP, as defined in section 1.1, whose principal practice address resides in Italy.

4.2 Legitimate interests

N/A. In the reporting period, Proveca Pharma Ltd. did not engage or contract any HCP, as defined in section 1.1, whose principal practice address resides in Italy.

5 Form of disclosure

5.1 Date of publication

Tuesday 30th June 2026.

5.2 Disclosure platform

N/A.

5.3 Disclosure language

English.

6 Disclosure financial data

6.1 Currency

All ToVs are declared in EUR. Where the original payment was made in another currency, the sum was converted into EUR at the exchange rate prevailing at the time of the original payment.

6.2 VAT included or excluded

The payments made to HCOs are declared in EUR and the final disclosed values do not include VAT.

6.3 Calculation rules

N/A.

7 Additional Information

N/A.