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Country: Austria]

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

Data year: 2025

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Contents

1 Definitions

1.1 Recipients

Proveca Pharma Ltd. engages in structured, transparent and compliant interactions with healthcare professionals (HCPs), healthcare organisations (HCOs). 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. Proveca Pharma Ltd. defines a HCP as any person who is a registered medical practitioner, dentist, pharmacist, or nurse. A HCO is defined as any 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 Europe or an organisation through which one or more health professionals or other relevant decision makers provide services.

1.2 Kind of ToVs

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

Donations and grants collectively, means providing funds, assets or services (freely given for the purpose of supporting healthcare, scientific research or education), with no consequent obligation on the recipient to provide goods or services to the benefit of the donor in return.

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, a PO or a third party.

Support of attendance by health professionals at events/meetings is defined as a support providing, or covering the costs of meals, travel, accommodation and/or registration fees to support the attendance of an individual HCP or PO representative at an event, organised or created by a company and/or a third party.

Fees and expenses in relation to the use of consultants HCPs can be used as consultants and advisors for services, training, advisory board meeting participation, or market research participation. The compensation for services will be reasonable and reflect the fair market value of the contracted work.

Research and development transfer of value are defined as, transfers of value to HCPs or HCOs, related to the planning or conduct of non-clinical studies, clinical trials, non-interventional studies that are prospective and in nature and that involve the collection of patient data from or on behalf of individual or groups of HCPs specifically for the study.

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 one non-monetary ToV to a HCO in the form of donated educational materials. This support was provided as a benefit in-kind rather than a direct financial payment. The value of this non-monetary ToV was determined based on the cost of purchase of the items, and the cost of shipment of the items to the recipient HCP.

2.8 ToVs in case of partial attendances or cancellation and refund

N/A.

2.9 Cross-border activities

In the reporting period, Proveca Pharma Ltd. identified ToV arising from cross-border activities. A cross-border activity is defined as a ToV made to a recipient whose principal practice address or registered office is located in a country different from that of the disclosing company, or where the activity giving rise to the ToV took place outside of Austria. Where Proveca Pharma Ltd. made a ToV to a recipient with a principal address or registered officer in Austria, the transfer has been disclosed, irrespective of where the event or activity took place. Where a ToV was made to a recipient whose principal address or registered office is located outside Austria, the disclosure has been made in accordance with the national transparency requirements applicable in the recipient's country of practice. In such cases, disclosure is made in the country of the recipient's principal practice address, in line with local codes of practice to avoid duplication or omission.

2.10 R&D

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

2.11 Voluntary disclosure

N/A.

3 Specific considerations

3.1 Country unique identifier

N/A.]

3.2 Self-incorporated HCP

N/A. No HCPs contracted by Proveca Pharma Ltd. used their own Limited company in the reporting period.

3.3 Multi-year agreements

N/A. Proveca Pharma Ltd. have not entered into any multi-year agreements with HCPs or HCOs registered in Austria 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 Austria and concerning Austrian 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 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

For each transfer of value, the consent for disclosure was asked. In cases the consent was not given by the HCP the ToV is disclosed in aggregated form.

4.2 Legitimate interests

N/A

5 Form of disclosure

5.1 Date of publication

Tuesday 30th June 2026

5.2 Disclosure platform

Proveca Website https://www.proveca.com/about/disclosures/

5.3 Disclosure language

German/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, including research and development payments, are declared in EUR and the final disclosed values do not include VAT. The payments made to HCPs are declared in EUR, and the final disclosed values do not include VAT.

6.3 Calculation rules

Proveca Pharma Ltd. disclose non-monetary ToVs at their fair market value, representing the cost that the recipient would reasonably have incurred if the support had been purchased independently on the open market. Where applicable, this includes the cost of goods or services provided, such as the purchase cost of materials or the cost of services rendered.

7 Additional Information

N/A.