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# Proveca: Methodological Note on HCP/ORDM/HCO Disclosure 2025

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# 1 Definitions

## 1.1 Recipients

Proveca (Germany) GmbH conducts structured, transparent, and compliant interactions with healthcare professionals (HCPs), healthcare organizations (HCOs), and patient organizations (POs). These assignments are carried out for legitimate professional and scientific reasons and allow Proveca (Germany) GmbH to obtain independent expert advice to support the highest standards of patient care. According to the AKG Code of Conduct, Proveca (Germany) GmbH defines HCPs as members of the healthcare professions or industry, institutions that serve human health, or other persons to the extent that they are authorized to trade in purely prescription drugs or to use them in the course of the exercise of their profession in connection with the annual disclosure of value transfers (ToVs). An HCO is defined as either a health, medical or scientific association or organisation, such as a hospital, clinic, foundation, university or other teaching institution or scientific society, whose business address, place of establishment or primary place of business is in Europe, or an organisation through which one or more health professionals or other relevant decision-makers provide services. A PO as an organisation consisting mainly of patients and/or carers or user organisations such as disability organisations, care or relatives' organisations and consumer organisations that represent and/or support the needs of patients and/or carers. |

## 1.2 A type of ToVs

Proveca (Germany) GmbH carried out the following types of obligations with the recipients as defined in section 1.1.

**Donations and grants** are defined as funds, benefits in kind, or services that are freely provided to support healthcare, scientific research, or education, with no obligation on the part of the recipient organization, institution, and the like to provide goods and services in return for the benefit of the pharmaceutical company.

**Sponsorship, including contributions to costs associated with events/meetings**, is defined as a contribution, financial or otherwise, in whole or in part, by or on behalf of a

company, to an activity (including an event/session or material) conducted, organized, created, etc. by an HCO, PO or other independent organization.

**Support for health professionals' participation in events/meetings** is defined as a financial contribution, in whole or in part, whether paid directly or indirectly to individual HCPs to attend events/meetings, and is limited to travel, accommodation, livelihoods, and real registration fees related to a specific meeting or event.

**Fees and expenses paid to healthcare professionals for contractual services** include services such as lecturing and chairing meetings, participating in medical/scientific studies, clinical trials, training services, writing articles and/or publications, attending advisory board meetings, and participating in market research, where such participation may include compensation and/or hospitality. The fees for services paid by Proveca (Deutschland) GmbH reflect the fair market value for the respective service. Expenses are limited to travel, food and accommodation associated with the provision of the contracted service.

**Value transfer from research and development** is defined as value transfers to HCPs or HCOs that relate to the planning or conduct of non-clinical trials, clinical trials, or non-interventional studies that are prospective 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 Scope of disclosure

### 2.1 Affected products

Prescription drugs (POMs) only. |

### 2.2 The company in question

Proveca (Deutschland) GmbH |

### 2.3 Excluded ToVs

N/A. |

### 2.4 ToVs Date

The period submitted by the 2026 began on January 1, 2025 and ended on December 31, 2025. |

### 2.5 Direct ToVs

A direct ToV is defined as being carried out directly by a company for the benefit of a recipient. The activities carried out by Proveca (Germany) GmbH, which constituted direct ToVs in this reporting period, included fees for services, sponsorships and payments related to supporting HCPs to participate in meetings/events. |

### 2.6 Indirect ToVs

An indirect ToV is defined as one that is carried out by a company for the benefit of a recipient through an intermediary and where the company knows or can identify which

recipient will benefit from the ToV. The activities carried out by Proveca (Germany) GmbH that served as indirect ToVs in this reporting period were sponsorship payments related to meetings/events. ]

## **2.7 Non-monetary ToVs**

[N/A.]

## **2.8 ToVs for partial attendance or cancellations and refunds**

[N/A.]

## **2.9 Cross-border activities**

[In the reporting period, Proveca (Germany) GmbH identified ToVs resulting from cross-border activities. A cross-border activity is defined as a ToV addressed to a recipient whose main address or registered office is in a country other than the disclosed entity, or where the activity giving rise to the ToV took place outside Germany. If Proveca (Germany) GmbH issued a ToV to a recipient with a primary physician address or registered office in Germany, the transfer was disclosed through the Proveca website, regardless of where the event or activity occurred. If a ToV has been issued to a recipient whose main practice address or registered office is outside Germany, the disclosure will be made in accordance with the national transparency regulations applicable in the recipient's country of practice. In such cases, disclosure will be made in the country of the recipient's primary address, in accordance with the local code of conduct, to avoid duplication or omission. ]

## **2.10 R&D**

[For the purposes of this disclosure, R&D-ToVs means transfers of value to HCPs or HCOs in connection with the planning or conduct of non-clinical trials (as defined in the OECD Principles of Good Laboratory Practice), clinical trials (as defined in Directive 2001/20/EC or Regulation (EU) No 536/2014), as well as non-interventional studies that are prospective in nature and involve the collection of patient data from or on behalf of HCPs or HCOs specifically for learning. If payments are made indirectly through third parties (such as contract research organizations or study management organizations) on behalf of the company, these amounts will be included in the aggregated R&D disclosure if the eventual activity is related to R&D. All R&D value transfers are a single aggregated amount that covers the reporting period and represents the total value of payments related to R&D activities over the course of the year. Payments categorized as R&D are excluded from the individual disclosure categories such as consulting fees, advisory boards, sponsorship of attending meetings, and other service-related payments. ]

## **2.11 Voluntary Disclosure**

[N/A.]

# **3 Specific considerations**

## **3.1 Country-unique identifier**

[N/A.]

### **3.2 Self-Organized HCP**

N/A. No HCPs commissioned by Proveca (Germany) GmbH used their own GmbH. |

### **3.3 Multiannual agreements**

N/A. Proveca (Germany) GmbH has not entered into any multi-year agreements that apply to the disclosure period. |

### **3.4 Country-specific characteristics**

N/A. |

### **3.5 Quality controls**

Proveca Germany (GmbH) follows an internally defined procedure for the disclosure of ToVs in connection with activities carried out in Germany and relevant German HCPs and HCOs. The process includes a formal review phase with two appropriately trained employees of Proveca (Germany) GmbH. One employee is responsible for preparing and finalizing the disclosure documentation in accordance with PMCPA requirements, while the second employee independently reviews the documentation to ensure that the information disclosed is complete, accurate, and consistent with the internal documentation prior to filing. |

## **4 Legal basis for data protection**

### **4.1 Obtaining consent**

For each ToV, the consent of the recipient is obtained as part of the contract process |

### **4.2 Legitimate interests**

N/A |

## **5 Form of disclosure**

### **5.1 Release Date**

30/06/2026 |

### **5.2 Disclosure Platform**

Proveca Webiste |

### **5.3 Disclosure language**

English. |

## **6 Financial Disclosure**

### **6.1 Currency**

All ToVs are declared in Euro €. If the original payment was made in a different currency, the amount was converted to € at the time of the original payment. |

### **6.2 VAT included or excluded**

Payments made to HCOs, including research and development payments, are expressed in €, and the final disclosed values do not include VAT. Payments to HCPs are expressed in €, and the final disclosed values do not include VAT. |

### **6.3 Calculation rules**

Proveca (Germany) GmbH discloses non-monetary ToVs at fair market value, which represents the cost that the recipient would have reasonably incurred if the support had been acquired independently on the open market. Where it is not possible to assign a meaningful or reasonable monetary value to the support provided, Proveca (Germany) GmbH discloses a clear and sufficiently detailed description of the non-monetary benefit to ensure transparency and to enable the reader to understand the nature, scope and purpose of the support in accordance with the requirements of the AKG Code. |

## **7 Additional information**

|N/A. |