

BioArctic Norge AS

Methodological note for disclosure of transfer of Value (ToV) to HCP/HCO 2025

Data year: 2025

Year of publication: 2026

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1 Definitions

1.1 Recipients

Healthcare Personnel (HCP) shall mean a person as defined in the Medicines Regulation § 13-7 or in the Health Personnel Act, as well as others who work in a health organization with healthcare or patient treatment. Healthcare personnel such as a physician, dentist, pharmacist, nurse or other persons within the healthcare system, who have the right to prescribe, purchase, distribute, recommend or administer a medical product, may fall within the definition of healthcare personnel.

Healthcare Organization (HCO) shall mean any legal entity (i) that provides healthcare or patient treatment, such as a healthcare enterprise, medical practice, etc. (ii) that is a research or teaching institution in medical, biological or health-related subjects, such as a university or other learning institution, (iii) through which Healthcare Professionals provide healthcare services, or (iv) that is a Healthcare Professionals Association (non-commercial association of Healthcare Professionals who have a common interest, cause or field of expertise they wish to promote). Companies such as private limited companies, trading companies or sole proprietorships are also considered healthcare organizations.

1.2 Kind of ToVs

Transfers of value to HCPs and HCOs

During 2025, the following transfers of value were made:

Healthcare Personnel (HCPs)

- Remuneration for consultation and assignments
- Reimbursement for expenses

Healthcare Organisations (HCOs)

- Remuneration for consultation and assignments
- Reimbursement for expenses

2 Disclosure's Scope

2.1 Products concerned

Prescribed Only Medicines.

2.2 Company concerned

BioArctic Norge AS

A research oriented biopharma company with expertise in neurodegenerative disorders and headquarters in Sweden.

2.3 Excluded ToVs

Transfers of value from another company with a collaboration agreement with BioArctic are reported by that other company and not by BioArctic.

2.4 ToVs date

The ToV disclosure is based on the payment date.

2.5 Direct ToVs

The majority of transfers of value are made directly to the receiving HCP/HCO.

2.6 Indirect ToVs

For certain individual sponsorship activities, a third party may receive a transfer of value on behalf of the HCO. The ToV is disclosed against the relevant HCO.

2.7 Non-monetary ToVs

Not applicable

2.8 ToVs in case of partial attendances or cancellation and refund

Not applicable

2.9 Cross-border activities

All BioArctic activities involving Norwegian HCPs and HCOs were managed by BioArctic Norge AS, irrespective of the country in which the activity took place.

2.10 Transfers of value to Research and Development

In 2025, no transfers of value were carried out linked to Research and Development activities.

2.11 Voluntary disclosure

Not applicable

3 Specific considerations

3.1 Country unique identifier

Not applicable

3.2 Self-incorporated HCP

HCPs who operate through their own company as a separate legal entity as well as HCPs who operate as sole proprietors are reported as HCOs.

3.3 Multi-year agreements

Not applicable

3.4 Country specificities

Not applicable

3.5 Quality Checks

Prior to publication, the compiled disclosure data is subject to internal quality checks to confirm completeness, accuracy and overall reasonableness. Any identified discrepancies are investigated and corrected, as appropriate, before the disclosure is finalised.

4 Data protection legal basis

4.1 Consent collection

Not applicable

4.2 Legitimate interests

BioArctic Norge AS uses legitimate interests (for more information on the concept of legitimate interest, see Article 6 (1) (f) of the EU General Data Protection Regulation (2016/679, GDPR)) as the disclosure processing basis. In contracting the healthcare professional is not specifically asked to consent to the disclosure of their information.

A healthcare professional is always free to refuse to cooperate if they do not want their information to be published. In addition, the data subject always has the right to object to the processing of his/her data. In this case, the disclosure will not be made in the name of the data subject, but the information will be published in aggregate form so that the individual cannot be identified. The data subject also has the right to object to the processing of his or her data afterwards, in which case the data will be deleted from the public registers without delay.

5 Form of disclosure

5.1 Date of publication

25 June 2026

5.2 Disclosure platform

BioArctic's report for 2025 is published on www.bioarctic.no.

5.3 Disclosure language

The value transfers data is disclosed in Norwegian whereas this methodological note is published in English.

6 Disclosure financial data

6.1 Currency

Value transfers are reported in NOK. In cases where the value transfer has been made in another currency, the value transfer is reported in NOK according to the exchange rate that applied at the time of payment.

6.2 VAT included or excluded

All value transfers are reported excluding VAT.

6.3 Calculation rules

This report includes all transfers of value to individuals and entities that meet the definition of healthcare professionals (HCPs) or healthcare organisations (HCOs), where the payment date fell in 2025 (irrespective of the contract date, contract term or event date).

For fees paid as salary, the gross salary amount and no social security contributions are reported.

For fees that are invoiced, the invoiced amount is reported excluding VAT. Likewise, expenses in connection with the performance of the assignment are reported excluding VAT.

7 Additional Information

If you have any questions regarding this report, please contact:

Anna Juhlin, Marketing Compliance Officer

anna.juhlin@bioarctic.com, +46 8 695 69 30