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Country: Sweden, Norway and Denmark

AGB-Pharma AB

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

Data Year: 2025

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Introduction

As a member company of EFPIA and LIF, AGB-Pharma is committed to ensure that the nature and scope of Transfers of Value (ToV) with Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs) are clear and transparent to the public.

This Methodological Note provides guidance on how AGB-Pharma has recorded and publicly reported this information and it has been prepared in accordance with the mandatory standardised structure set out in EFPIA Code Annex B.

1 Definitions

1.1 Recipients

Healthcare Professional (HCP): A member of the medical, dental, pharmacy or nursing professions or any other person who, in the course of his/her professional activities, may prescribe, purchase, supply, recommend or administer a medicinal product and whose primary practice, principal professional address or place of incorporation is in Sweden, Norway or Denmark.

Healthcare Organisation (HCO): A healthcare, medical or scientific association or organisation (e.g., 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 Sweden, Norway or Denmark; or an organisation through which one or more HCPs provide services.

1.2 Kind of ToVs

Fees for Service and Consultancy

Fees paid to HCPs or HCOs for providing services to AGB-Pharma, including consultancy, advisory board participation, speaking engagements, or other professional services conducted under a written agreement.

Related Expenses

Reasonable travel, accommodation, and subsistence expenses reimbursed in connection with services provided to AGB-Pharma.

Research and Development (R&D)

ToVs relating to research and development activities, including clinical trials and non-interventional studies, which are disclosed in aggregate.

In 2025, AGB-Pharma has disclosed the following (✓) ToVs in Scandinavia:

	Sweden	Norway	Denmark
HCP			
Fees for Service and Consultancy	-	-	✓
Related Expenses	-	-	✓
HCO			
Fees for Service and Consultancy	-	-	-
Related Expenses	-	-	-
R&D			
Research and Development	✓	-	-

2 Disclosure's Scope

2.1 Products concerned

This disclosure covers ToVs associated with Prescription Only Medicines (POMs) promoted or distributed by AGB-Pharma in Sweden, Norway and Denmark. OTC medicines and medical devices are not part of AGB-Pharma's portfolio and are therefore not applicable.

2.2 Company concerned

This disclosure covers ToVs made directly by AGB-Pharma AB, org. no. 556859-2074.

2.3 Excluded ToVs

- Costs for internal AGB-Pharma events, where these relate solely to internal company activities and do not constitute a transfer of value to an HCP or HCO.
- Materials and promotional aids of negligible value that fall within permitted limits and are therefore not required to be disclosed as ToVs.

2.4 ToVs date

This disclosure covers all qualifying ToVs made by AGB-Pharma during the period 1 January 2025 to 31 December 2025. The reported value corresponds to the calendar year in which the payment was made.

2.5 Direct ToVs

Direct ToVs are those made by AGB-Pharma directly to an HCP or HCO. The following types of activity give rise to direct ToVs:

- Fee-for-service arrangements, including speaker fees, advisory board honoraria, consultancy fees made to HCPs or HCOs.
- Reimbursement of travel and accommodation expenses for HCPs attending AGB-Pharma organised or sponsored meetings or activities.

2.6 Indirect ToVs

Where ToVs are made via third parties acting on behalf of AGB-Pharma (for example event organisers, agencies or service providers), AGB-Pharma ensures that the relevant ToVs are captured and disclosed in accordance with the national requirements.

2.7 Non-monetary ToVs

N/A

2.8 ToVs in case of partial attendances or cancellation and refund

ToVs will only be disclosed where the benefit has been received. In the event of a cancellation or where a HCP or HCO does not receive the benefit due to non-participation, AGB-Pharma will not disclose it as a ToV.

2.9 Cross-border activities

AGB-Pharma discloses ToVs based on the HCP/HCO's principal place of practice. If the HCP/HCO operates in more than one country, AGB-Pharma will select one country to be the principal place of practice and disclose the ToV in that country.

2.10 R&D

During 2025, AGB-Pharma supported research and development activities by providing melatonin products for use in a clinical study. The total value of the products supplied is disclosed in the Swedish ToV report.

2.11 Voluntary disclosure

N/A

3 Specific considerations

3.1 Country unique identifier

AGB-Pharma does not submit publicly available professional identifiers and does not use internal or commercial unique identifier systems for HCPs or HCOs. Instead, records are managed using identifying information such as the individual's name, professional role, organisation and address details to ensure accurate attribution of ToV.

3.2 Self-incorporated HCP

Where a HCP provides services through their own limited company or personal service company, AGB-Pharma assesses the nature of the engagement to determine the appropriate recipient for disclosure. Where the services are provided by an identifiable individual HCP, the associated ToV is disclosed at the individual HCP level, even if payment is made to the HCP's limited company.

3.3 Multi-year agreements

N/A

3.4 Country specificities

N/A

3.5 Quality Checks

Prior to submission, AGB-Pharma undertakes the following internal pre-disclosure quality checks:

- Review of ToV records against available supporting documentation (e.g. contracts, invoices and expense records) to confirm the accuracy of reported amounts.
- Verification of HCP and HCO recipient details, including name and organisation, using internal records and publicly available information where appropriate.
- Final upload of the disclosure dataset to the company's web page by an authorized AGB-Pharma representative.

4 Data protection legal basis

4.1 Consent collection

AGB-Pharma relies on consent as the lawful basis for the individual disclosure of ToVs to HCPs. Consent is obtained through AGB-Pharma's contractual documentation prior to engagement.

Withdrawal of consent: HCPs may withdraw consent at any time prior to the annual publication date. Where consent is withdrawn before publication, the relevant ToV will be moved from individual disclosure to the aggregate disclosure. Consent withdrawn after publication cannot be applied retrospectively but will be applied to future disclosures.

4.2 Legitimate interests

AGB-Pharma does not rely on Legitimate Interests as the lawful basis for individual disclosure of ToVs. Where consent for individual disclosure is not obtained, the relevant ToV is disclosed in aggregate.

5 Form of disclosure

5.1 Date of publication

ToVs for the 2025 reporting year will be published by 30 June 2026 at the latest.

5.2 Disclosure platform

All ToVs to Swedish-based HCPs and HCOs are disclosed via the LIF disclosure platform (<https://www.lif.se/>) in accordance with the LIF Code of Ethical Rules (LER) and Public Disclosure of Transfers of Value to HCPs and HCOs (EFPIA Disclosure).

Additionally, the ToVs are also disclosed on the company website, on the Transparency page <https://www.agb-pharma.com/transparency/>.

5.3 Disclosure language

Swedish

6 Disclosure financial data

6.1 Currency

AGB-Pharma discloses ToVs to HCPs and HCOs in the local currency of the country of the principal practice stated on the invoice – Sweden (SEK), Norway (NOK) and Denmark (DKK).

6.2 VAT included or excluded

All transferred and reported amounts are excl. VAT.

6.3 Calculation rules

N/A

7 Additional Information

AGB-Pharma will maintain public disclosures for a minimum of three (3) years and will retain records for at least five (5) years after the end of the calendar year to which they relate.