

Disclosure Report 2025 - Organon Finland Oy											Publication Date: 11-Jun-2026	
	(Last name, first name) Full name <i>(124 \$)</i>	Principal place of business and/or registration: City <i>(124 \$)</i>	Principal place of business and/or registration: Country <i>(124 \$)</i>	Principal place of business and/or registration: Address <i>(124 \$)</i>	Unique identifier: Not in use in Finland	Donations and grants to healthcare organizations <i>(125 \$/1.a)</i>	Contribution to event costs <i>(125 \$/1.b)</i>			Service and consulting fees <i>(125 \$/1.c)</i>		TOTAL OPTIONAL
						Through healthcare organizations or third parties	Registration fees	Travel and accommodation expenses	Fees	Other expenses related to service and consulting contracts, including travel and accommodation expenses		
Healthcare professionals	INDIVIDUAL DISCLOSURE - one line/healthcare professional (i.e. all financial benefits to one recipient over one year are summed up; individualized amounts in euros can be provided to the recipient and/or the authority upon request)											
	MATIKAINEN, Nina	Helsinki	FI	Haartmaninkatu 4						3 500,00		3 500,00
	SUMELAHTI, Marja-Liisa	Tampere	FI	Rautatiekatu 27						3 400,00		3 400,00
	UIMARI, Outi	Oulu	FI	Koulukatu 41						1 700,00	203,30	1 903,30
	SUMMARY DISCLOSURE - (when information cannot be disclosed at an individual level for legal reasons)											
	Total amount of financial benefits to recipients - 126 \$										0	
	Number of recipients - 126 \$										0	
	What percentage of all recipients did not consent to the disclosure?										N/A	
Healthcare organizations	INDIVIDUAL DISCLOSURE - one line/healthcare organization (i.e. all financial benefits during one year to one recipient are summed up; individualized euro amounts can be provided to the recipient and/or authority upon request)											
	Neuroseura Aboa	Turku	FI	Kiinamyllynkatu 4-8			2 000,00					2 000,00
	Suomalainen Lääkäri-seura Duodecim-Duodecim Tampereen Lääkäri-seura ry	Tampere	FI	Kalevantie 2			2 685,00					2 685,00
	Suomen Kardiologinen Seura ry	Oulu	FI	Sepänkatu 20			4 620,00					4 620,00
	Suomen Kivuntutkimusyhdistys ry	Liminka	FI	c/o Anita Saariaho Myllykuja 10			1 600,00					1 600,00
	Suomen Neurologinen Yhdistys	Oulu	FI	PL 1			19 918,00					19 918,00
	Turunmaan Duodecim-seura Ry	Turku	FI	Lemminkäisenkatu 14 A			1 840,00					1 840,00
	SUMMARY DISCLOSURE - (when information cannot be disclosed at an individual level for legal reasons)											
	Total amount of financial benefits to recipients - 126 \$										N/A	
	Number of recipients - 126 \$										N/A	
	What percentage of all recipients did not consent to the disclosure?										N/A	
SUMMARY DISCLOSURE												
R & D	Financial benefits related to research and development must be disclosed in summary form as total amounts										0	

Organon Finland: Methodological Note for HCP/HCO Disclosure 2025

Contents

Organon Finland – Methodological Note.....	2
Introduction	2
1. Definitions.....	2
1.1 Recipients.....	2
1.2 Kind of ToVs	2
2. Disclosure’s Scope	3
2.1 Products concerned.....	3
2.2 Company concerned.....	3
2.4 ToVs date	3
2.5 Direct ToVs.....	4
2.6 Indirect ToVs	4
2.7 Non-monetary ToVs.....	4
2.8 ToVs in case of partial attendances or cancellation and refund	4
2.9 Cross-border activities.....	4
2.10 R&D.....	4
2.11 Voluntary disclosure.....	4
3. Specific considerations	4
3.1 Country unique identifier.....	4
3.2 Identification of the recipient of the benefit.....	5
3.2.1 Companies owned by HCPs (one person).....	5
3.3 Multi-year agreements.....	5
4. Data protection legal basis.....	5
4.1 Consent collection.....	5
4.2 Legitimate interests.....	5
5. Form of disclosure	5
5.1 Date of publication.....	5
5.2 Disclosure platform.....	5
5.3 Disclosure language.....	6
6. Disclosure financial data.....	6
6.1 Currency	6
6.2 VAT included or excluded.....	6
6.3 Calculation rules.....	6
7. Additional Information.....	6

Organon Finland: Methodological Note for HCP/HCO Disclosure 2025

Version: Last updated 04 June 2026

Country: Finland

Data year: 2025

Year of publication: 2026

Organon Finland – Methodological Note

Introduction

This Methodology Statement defines the relevant types of transfers to be disclosed, which transfers are excluded, and other relevant information to assist the reader understand how Organon collected, organized and reported the disclosed data in Finland. It follows the mandatory EFPIA standardised structure to support clarity and comparability of disclosure information.

1. Definitions

1.1 Recipients

Healthcare Professional (HCP): Any natural person that is a member of the medical, dental, pharmacy or nursing professions, or any other person who, as part of their professional activities, may prescribe, purchase, supply or administer a medicinal product, and whose primary practice or principal professional address is in Finland. This includes any official or employee of a governmental agency or other organisation that may prescribe, purchase, supply or administer medicinal products.

Deceased/retired recipients: Where a ToV was made prior to death or retirement, it is disclosed in the relevant data year.

Healthcare Organisation (HCO): Any healthcare, medical or scientific organisation such as a hospital, clinic, foundation, university, other teaching institution or learned society (excluding patient organisations), through which one or more HCPs provide services and whose place of incorporation is in Finland.

1.2 Kind of ToVs

Organon discloses the following kinds of ToVs:

HCOs:

- Donations and Grants for supporting healthcare, scientific research or education (no benefit in return).

- Contributions to costs related to events (e.g., sponsorship agreements, booth/stand hire, satellite symposia).
- Fees for services and consultancy (and related expenses).

HCPs:

- Contributions to costs related to events (registration fees; travel and accommodation).
- Fees for service and consultancy (e.g., speaking, advisory services, medical writing, data analysis, development of educational materials, market research when the identity is known to Organon).

Research & Development (R&D):

ToVs related to non-clinical studies, clinical trials and prospective non-interventional studies that involve collection of patient data.

2. Disclosure's Scope

2.1 Products concerned

This disclosure covers Transfers of Value related to prescription-only medicinal products. Transfers solely related to over-the-counter medicines or medical devices are not included.

2.2 Company concerned

This disclosure covers all relevant ToVs to recipients in Finland associated with the Organon group regardless of which Organon entity contracted with or paid a recipient.

2.3 Excluded ToVs

The following ToVs are excluded from disclosure:

- ToVs solely related to over-the-counter medicines.
- Ordinary course purchases and sales of medicines (e.g., between Organon and a pharmacy).
- Medical samples, investigational compounds and biological samples for study.
- Informational or educational materials and items of medical utility.
- ToVs to patient organisations (disclosed separately under relevant requirements).
- Meals and drinks.

2.4 ToVs date

Direct ToVs are disclosed based on the date Organon paid the ToV. E.g. if the payment occurred within the reporting period 1st January 2025 to 31st December 2025, the TOV would be disclosed in the 2025 report.

Indirect ToVs concerning travel and accommodation are disclosed based on the date the event took place. E.g. if the travelling occurred within the reporting period 1st January 2025 to 31st December 2025, the iTOV would be disclosed in the 2025 report.

2.5 Direct ToVs

Direct ToVs include, for example:

- Fees for service and consultancy paid, and related expenses, paid directly to HCPs or HCOs.
- Donations and Grants paid directly to HCOs.
- Sponsorships or contributions to costs of events paid to HCOs.

2.6 Indirect ToVs

Indirect ToVs include, for example:

- Travel and accommodation arranged or reimbursed through intermediaries for HCPs.
- Sponsorships or contributions to costs of events paid to third parties on behalf of HCOs.

2.7 Non-monetary ToVs

Not applicable.

2.8 ToVs in case of partial attendances or cancellation and refund

ToVs are reported on the basis of what Organon paid, not what the recipient ultimately received. Accordingly, in cases of partial attendance, the full amount paid by Organon is disclosed. Where an HCP cancels and no cost is incurred by Organon, no ToV is disclosed.

2.9 Cross-border activities

All ToVs to Finland recipients are disclosed in the Finland, irrespective of which Organon entity contracted with, organised or paid for the activity.

2.10 R&D

R&D ToVs include those related to non-clinical studies (as per OECD Principles on Good Laboratory Practice), clinical trials (as per Directive 2001/20/EC), and prospective non-interventional studies involving data collection from, or on behalf of, HCPs/HCOs.

2.11 Voluntary disclosure

Not applicable.

3. Specific considerations

3.1 Country unique identifier

Organon uses internal commercial identifiers to uniquely identify recipients within our systems.

3.2 Identification of the recipient of the benefit

According to the PIF (Pharma Industry Finland) disclosure guidelines, the benefit must be reported to a "clearly identifiable recipient". To follow this rule, Organon discloses the support for medical event to the Healthcare Organization that is the ultimate organizer and therefore the recipient of the benefit, and not to the professional event organizer, who acts on behalf of the HCO. Similarly, payments relating to lecturing or consultancy services of an HCP, that are charged via a financial & contractual services provider instead of the HCP themselves, will be disclosed on the HCP's name that provided the services.

3.2.1 Companies owned by HCPs (one person)

The disclosure is made on the name of the legal recipient. This means, in case the fee was paid to a legal company owned by a healthcare professional, the ToV is published on the name of the legal company, not the name of the healthcare professional.

3.3 Multi-year agreements

For multi-year agreements, Organon discloses the value in the year in which the ToV is made (i.e., when the cost is incurred/paid), with amounts reported for each calendar year accordingly.

4. Data protection legal basis

4.1 Consent collection

Not applicable. Organon relies on Legitimate Interests for publication of individual HCP data (see 4.2).

4.2 Legitimate interests

Organon have chosen to process personal data for the purposes of Transfer of Value using the legal basis of legitimate interests under Article 6(1)(f) GDPR, and outline this in the agreement between Organon and the data subject. This is communicated within contracts and letters of agreement. Individuals may object to processing by contacting privacyteam@organon.com. Organon assesses objections via a documented balancing test and will cease processing unless compelling legitimate grounds are demonstrated.

5. Form of disclosure

5.1 Date of publication

Latest last working day of June each year but preferably Thursday on the 2nd week of June, as instructed by PIF (Pharma association Finland).

5.2 Disclosure platform

Disclosure is made via the Organon Finland website.

5.3 Disclosure language

English

6. Disclosure financial data

6.1 Currency

EUR. Where costs are incurred in other currencies, values are converted using the exchange rate applicable on the date the cost is incurred/posting date within Organon's finance systems.

6.2 VAT included or excluded

Indirect ToVs (e.g., travel and accommodation arranged on behalf of, or reimbursed to, HCPs) include VAT. Direct payment ToVs exclude VAT (Organon recovers VAT where applicable).

6.3 Calculation rules

Disclosed ToVs reflect the actual cost paid by Organon. In-kind/non-monetary ToVs (if any) are measured at Organon's cost. Refunds and credit notes are netted in the period they post, aligned to the ToV recognition rules described in Section 2.4.

7. Additional Information

For all queries contact: privacyteam@organon.com.