CASE/0903/03/26

COMPLAINANT v ALMIRALL

Allegations about Almirall websites

CASE SUMMARY

This case was in relation to Almirall's UK website. The Panel considered the complainant to allege that there was no information relating to Ebglyss (lebrikizumab) available on the Almirall UK company website, "including prescribing information or other product information typically expected for a prescription-only medicine" In the complainant's view, this meant that health professionals and members of the public seeking information about Ebglyss could be directed to non-UK websites or other external sources, with members of the public also potentially directed to promotional sources intended for health professionals. The complainant further alleged that, when selecting the "Media" tab on Almirall's UK website, the pop-up did not clearly indicate whether the user was leaving the UK website or being redirected to a website that was not the UK company website.

The outcome under the 2024 Code was:

Breach of Clause 5.8	**Failing to make it clear when a user is leaving a company's website**

No Breach of Clause 16.1 (x2)	**Requirement that promotional material about prescription only medicines directed to a UK audience which is provided on the internet must comply with all relevant requirements of the Code**
No Breach of Clause 5.1	**Requirement to maintain high standards at all times**

This summary is not intended to be read in isolation.
For full details, please see the full case report below.

FULL CASE REPORT

A complaint was received about Almirall from an anonymous, non-contactable complainant who described themselves as a member of the public.

COMPLAINT

The complaint wording is reproduced below with some typographical errors corrected:

"Company concerned: Almirall Product concerned: Ebglyss Subject: Availability of

information regarding Ebglyss on UK websites Description of the concern I would like to raise a concern regarding the availability and accessibility of information relating to Ebglyss on the UK websites of Almirall. On 10 March 2026 I reviewed the UK website of Almirall. Ebglyss does not appear to be listed on the “Our Products” section of the UK website: [URL provided]. At the time of review there appeared to be no information relating to Ebglyss available on the UK company website, including prescribing information or other product information typically expected for a prescription-only medicine. In addition, the dermatology healthcare professional website referenced by Almirall appears not to be functional. The following page: [URL provided] displays a message indicating that the page is still in development and does not provide access to any information relating to Ebglyss for healthcare professionals. Given that Ebglyss appears to be the newest product within the Almirall dermatology portfolio, the absence of information on the UK corporate website and the lack of a functional HCP page may mean that healthcare professionals or members of the public seeking information about the medicine could be directed to non-UK websites or other external sources. Clause 28.1 of the ABPI Code of Practice states that promotional material about prescription-only medicines directed to a UK audience which is provided on the Internet must comply with all relevant requirements of the Code. Furthermore, the Supplementary Information to Clause 28.1 states that unless access to promotional material about prescription-only medicines is limited to health professionals and other relevant decision makers, a pharmaceutical company website or company-sponsored website must provide information for the public as well as promotion to health professionals, with the sections for each target audience clearly separated and the intended audience identified. This is intended to avoid the public needing to access material for health professionals unless they choose to. The MHRA Blue Guide similarly states that the public should not be encouraged to access material which is not intended for them. In the present case, because the UK company website does not appear to provide information relating to Ebglyss and the HCP dermatology website page is currently non-functional, individuals searching for information about the medicine may instead be directed to non-UK or potentially promotional sources intended for healthcare professionals. I would therefore be grateful if the PMCPA could consider whether the current availability and accessibility of information relating to Ebglyss on the UK websites of Almirall is compliant with Clause 28.1 and the associated supplementary information in the ABPI Code of Practice. Evidence • Screenshot of the Almirall UK “Our Products” webpage showing that Ebglyss is not listed (captured 10 March 2026) • Screenshot of the dermatology HCP page showing the “this page is in development” message (captured 10 March 2026) [URLs provided]”

The complainant provided additional information in a second email:

> “While reviewing the Almirall UK website on 10 March 2026, I observed an issue relating to redirection from the UK website to another platform. When selecting the “Media” tab on the Almirall UK website, a pop-up message appears stating: “We are going to take you to a different platform. This platform is safe as takes part of Almirall ecosystem.” The pop-up provides the option to cancel or accept the redirection. However, the message does not clearly indicate whether the user is leaving the UK website or being redirected to a website that is not the UK company website. It also does not specify the destination domain or whether the content on the subsequent platform is intended for a UK audience. Clause 5.8 of the ABPI Code of Practice states that it should be made clear when a user is leaving any of the company’s websites or websites sponsored by the

company or is being directed to a website which is not that of the company. In this case, the wording used in the pop-up ("a different platform" that is "part of the Almirall ecosystem") does not clearly inform the user whether they are leaving the UK company website or being redirected to a website outside the UK environment. As a result, users may not be aware that they are potentially accessing content hosted on a non-UK platform which may not have been developed for a UK audience or certified in accordance with UK requirements. I would therefore be grateful if the PMCPA could consider whether the current wording and presentation of this redirection is compliant with Clause 5.8 of the ABPI Code of Practice. Evidence • Screenshot of the pop-up message shown when selecting the Media tab on the Almirall UK website (captured 10 March 2026)"

When writing to Almirall, the PMCPA asked it to consider the requirements of Clauses 5.1, 5.8 and 16.1 of the 2024 Code.

ALMIRALL'S RESPONSE

The response from Almirall is reproduced below:

"Thank you for your letter of 11th March 2026 advising allegations have been made about the Almirall owned websites [URLs provided]

The complainant(s) allegations are summarised as follows.

Regarding the UK corporate website, [URL provided]:

1) The complainant (complaint 1) refers to the "Media" tab on the website in which a pop-up message appears stating: "We are going to take you to a different platform. This platform is safe as takes part of Almirall ecosystem." The complainant states *"the pop-up provides the option to cancel or accept the redirection. However, the message does not clearly indicate whether the user is leaving the UK website or being redirected to a website that is not the UK company website. It also does not specify the destination domain or whether the content on the subsequent platform is intended for a UK audience."* The complainant is concerned that *"users may not be aware that they are potentially accessing content hosted on a non-UK platform which may not have been developed for a UK audience or certified in accordance with UK requirements."*

2) The separate complaint (complaint 2) is regarding the *"Our Products"* page of this site which does not provide information about Ebglyss. The complainant states there is *"no information relating to Ebglyss on the UK company website, including prescribing information and other product information typically expected for a prescription only medicine."*

Regarding the HCP website [URL for a Almirall UK dermatology webpage provided]:

3) Complaint 2 also states that [URL provided] demonstrates a *"lack of a functional HCP page"* and states there is no information about Ebglyss provided for healthcare professionals. The complainant states *"that unless access to promotional material about prescription-only medicines is limited to health*

professionals and other relevant decision makers, a pharmaceutical company website or company-sponsored website must provide information for the public as well as promotion to health professionals, with the sections for each target audience clearly separated and the intended audience identified." The complainant expresses concern that *"because the UK company website does not appear to provide information relating to Ebglyss and the HCP dermatology website page is currently non-functional, individuals searching for information about the medicine may instead be directed to non-UK or potentially promotional sources intended for healthcare professionals."*

Allegation (1) - Media tab on [URL for a UK Almirall webpage provided]
Clause 5.8 of the code stipulates that it should be made clear when a user is leaving any of the company's websites or websites sponsored by the company or is being directed to a website which is not that of the company.

Whilst the language of the pop-up box could be refined, it is clear that the user is not leaving the Almirall Global organisation's websites and will remain on an Almirall platform (after clicking 'Accept' in the pop-up box, the user is taken to [URL to Global media webpage provided]). Given the linked page is still owned and managed by Almirall, and the user is directed to a website which is also part of the company, Clause 5.8 is not applicable and we refute the allegation of breach in this regard.

By comparison, where [URL for a UK Almirall webpage provided] does in fact link to an external website (such as the MHRA Yellow Card Scheme), the user is presented with a pop-up that states: "You are about to leave [URL for a UK Almirall webpage provided] Specific policies may apply to the site you are visiting; all interaction with that site is at your own risk. [Cancel] [Accept]". This clearly informs the user that they are leaving Almirall's website and are being directed to a website which is not that of Almirall.

Although there has been no breach of the Code (as users remain on Almirall's platform), the pop-up will be removed as it is not necessary for the functioning of the site. This change will enhance clarity for users and will take effect from 30 April 2026.

Allegation (2) – Our Products tab on [URL for a UK Almirall webpage provided]
The website is a corporate website whose intended readers are members of the public. Information on this site is not directed to healthcare professionals and is not promotional. Thus, the allegation of missing "prescribing information" for Ebglyss (lebrikizumab) is not applicable in this case.

Healthcare professionals seeking prescribing information about Ebglyss (lebrikizumab) can find this on the eMC website [URL provided].

For these reasons, we believe that Clause 16.1 is not applicable in this case. Thus, we refute the allegation of a breach in this regard.

Although we refute the breach and have no obligation to include information about Ebglyss on our corporate website, we nevertheless intend to update the Our products tab on [URL provided] to also refer to Ebglyss. These updates will be effective from 30th April 2026. This update does not affect our underlying position that Clause 16.1 does not apply to this website, as it is not promotional.

Allegation (3) – non-functional web page [URL provided] and lack of information about Ebglyss therein

The dermatology website is accessible via a separate tab of the corporate website, which is labelled 'HCP'. The complainant correctly states that the intended audience for this website would be healthcare professionals, and that the site was under construction at the time of the complaint. The website remains in development at present and is expected to go-live on 29th May 2026.

The complainant alleged that because there is no information about Ebglyss on the corporate website and the link (for HCPs) is currently non-functional, users "*may instead be directed to non-UK or potentially promotional sources intended for healthcare professionals.*" We do not follow or agree with this hypothetical scenario. As promotional material about Ebglyss was not being provided to health professionals or other relevant decision makers, we do not believe that the public was encouraged to access material which is not intended for them. Therefore the requirements of Clause 16.1 and the associated Supplementary Information are not relevant in this case. In any event and as noted, although we do not consider that there has been any breach of the Code, we intend to update the Our Products page with information about Ebglyss in due course.

In summary, following a thorough investigation of the issues cited by the complainant(s) we refute the allegation of breaches of Clauses 5.1, 5.8 and 16.1 of the ABPI Code of Practice 2024."

PANEL RULING

This complaint was in relation to Almirall's UK website. The Panel considered the complainant to allege that:

1. There was no information relating to Ebglyss (lebrikizumab) available on the UK company website, "including prescribing information or other product information typically expected for a prescription-only medicine". Furthermore, as Almirall's dermatology health professional website appeared to be non-functioning, health professionals and members of the public seeking information about Ebglyss could be directed to non-UK websites or other external sources and in the case of members of the public they may also be directed to potentially promotional sources intended for health professionals.
2. When selecting the "Media" tab on Almirall's UK website, the pop-up did not clearly indicate whether the user was leaving the UK website or being redirected to a website that was not the UK company website.

<u>Information on Ebglyss on Almirall's UK website</u>

The Panel understood the first of the complainants' allegations to relate to the lack of information for Ebglyss on Almirall's UK website. The complainant highlighted the "Our Products" and health professional dermatology webpages. The complainant alleged that Ebglyss was not mentioned on the "Our Products" webpage and that *"there appeared to be no information relating to Ebglyss available on the UK company website, including prescribing information or other product information typically expected for a prescription-only medicine"*. They also alleged that the health professional dermatology webpage appeared to be non-

functional and did not provide access to any information relating to Ebglyss for healthcare professionals. Consequently, the complainant alleged this absence of information may result in health professionals and members of the public seeking information being directed to non-UK websites or external sources. The Panel noted the complaint had cited Clause 28.1 from the 2019 code however, the case preparation manager considered that the 2024 Code applied and raised Clause 16.1. Clause 16.1 stated "*Promotional material about prescription only medicines directed to a UK audience which is provided on the internet must comply with all relevant requirements of the Code."*

The "Our Products" webpage sat on what appeared to be Almirall UK's corporate website and listed 23 products along with links to their Summary of Product Characteristics (SPCs) and Patient Information Leaflets (PILs). The Panel noted that Ebglyss was not listed on the page as acknowledged by Almirall.

The health professional dermatology webpage, which was accessible from the navigational banner on the Almirall UK corporate homepage, sat behind a pop up which stated *"This is a promotional website intended for UK healthcare professionals only (HCPs). Please confirm you are a healthcare professional before accessing the content"*, followed by two buttons labelled *"I am a healthcare professional"* and *"I am not a healthcare professional"*, respectively. Clicking on the *"I am a healthcare professional"* button led to the health professional dermatology webpage. In the top left corner of the page appeared the sentence *"This page is in development"*, followed by *"This page is in development, please come back again soon!"* part way down the page. Below this was an Almirall logo and a webpage footer which included adverse events reporting statements for the UK and IE, along with prescribing information links for several products, one of which was Ebglyss. It was not clear to the Panel if these prescribing information links were active.

The Panel noted that the supplementary information to Clause 16.1 stated

> *"Unless access to promotional material about prescription only medicines is limited to health professionals and other relevant decision makers, a pharmaceutical company website or a company sponsored website must provide information for the public as well as promotion to health professionals with the sections for each target audience clearly separated and the intended audience identified. This is to avoid the public needing to access material for health professionals unless they choose to. The MHRA Blue Guide states that the public should not be encouraged to access material which is not intended for them."*

The Panel's interpretation of the supplementary information to Clause 16.1 was that pharmaceutical companies were only required by the Code to provide information for the public about prescription only medicines, when access to promotional material about prescription only medicines was not limited to health professionals and other relevant decision makers. Noting the presence of the pop-up requesting confirmation of a viewer's healthcare professional status and that the pop-up clearly directed members of the public elsewhere, in the circumstances of this case, the Panel considered that the complainant had not demonstrated that access to promotional materials had not been limited to health professionals and other relevant decision makers as required by the relevant supplementary information. Further the Panel noted that in any event there was no substantive promotional information on the health professional dermatology page, and although there was a reference to prescribing information it was not known whether the link was active.

The complainant had failed to establish that not having a web page with information for health professionals regarding Ebglyss had resulted in health professionals seeking information about Ebglyss from non-UK websites as alleged and the Panel ruled **no breach of Clause 16.1.**

In relation to the complainant's similar allegation regarding whether the absence of information about Ebglyss on the corporate website would result in members of the public seeking information from non-UK websites the Panel noted that Clause 16.1 did not apply to material that was apparently non-promotional and suitable for the general public and thus ruled **no breach of Clause 16.1** on this point.

Website Navigation Pop-up

The complainant raised an allegation in relation to a pop-up that appeared when selecting the "Media" tab on Almirall UK's website. The Panel understood the complainant's allegation to be that it was not reasonably clear whether users selecting the "Media" tab were leaving the UK website or being redirected to a website that was not the UK company website. The complainant further alleged the pop-up did not make clear if the content on the subsequent platform was intended for a UK audience.

From the screenshots provided by Almirall, it was clear that when clicking on the "Media tab", a pop-up appeared with the following wording "*We are going to take you to a different platform*", followed by "*This platform is safe as takes part of the Almirall ecosystem*" with buttons to either cancel or accept.

Clause 5.8 stated "*It should be made clear when a user is leaving any of the company's websites or websites sponsored by the company or is being directed to a website which is not that of the company*." The Panel noted that the supplementary information to Clause 3.4 defined "company" as any legal entity that organises or sponsors promotion which takes place within Europe, whether such entity be a parent company (e.g. headquarters, principal office or controlling company of a commercial enterprise), subsidiary company or any other form of enterprise or organisation.

Almirall submitted that *"Whilst the language of the pop-up box could be refined, it is clear that the user is not leaving the Almirall Global organisation's websites and will remain on an Almirall platform (after clicking 'Accept' in the pop-up box, the user is taken to* [URL to Global media webpage provided]*)"*. However, the Panel noted that elsewhere on the Almirall UK website, when a user clicked the Investors tab, a pop-up appeared that read "*You are about to leave the Almirall UK site"* followed by "*This link will take you to the investors section of the Almirall Corporate website. This site may contain information about products that are not approved in the UK or not intended for a UK audience, including information for HCPs only and not suitable for members of the public. Please read the applicable legal notice and privacy policy when accessing this and click "Accept" to leave the UK site*". Beneath this were buttons to either cancel or accept being diverted to another webpage, which the Panel noted was the same website a user would be diverted to from clicking the "Media" tab referred to in the complainant's allegation.

Based on the information before it and considering the navigation pop-up wording that was available in other areas of the Almirall UK website, the Panel concluded that it was not reasonably clear from the outset that the media page was part of Almirall's global website and

not part of the UK website. Considering this along with the messaging that appeared when accessing other links to the global webpage from Almirall's UK webpage, the Panel understood the linked website to be under the management of Almirall global, which was a separate legal entity to Almirall's UK affiliate. It therefore would have been necessary to make it clear to users of the UK webpage, that they were being directed to the global website.

Due to the wording of the pop-up "*This platform is safe as takes part of the Almirall ecosystem*" coupled with no clear distinction once on the global platform, no reference to any intended audience, or any other clear indication that the linked page was that of a different company, albeit Almirall's global entity, the Panel determined that Almirall had not made it clear that a user was leaving the company's website when clicking on the "Media" tab. The Panel ruled a **breach of Clause 5.8.**

High standards

On balance, the Panel considered that its ruling of a breach of Clause 5.8 was proportionate and adequately addressed the complainant's allegation that it was not reasonably clear whether users selecting the "Media" tab were leaving the UK website. Although Almirall had failed to make it clear that users were being directed to what was considered a non-UK web page, the Panel acknowledged Almirall had made some attempt to inform users that they were going to a different page. Noting the no breach ruling of Clause 16.1 and having consider that there were no additional factors which warranted a breach in relation to a failure to maintain high standards, the Panel ruled **no breach of Clause 5.1**.

Complaint received **10 March 2026**

Case completed **6 October 2026**