

Alnylam Pharmaceuticals

Methodological note for HCP/ORDM/HCO disclosure

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Introduction

Alnylam Pharmaceuticals UK has voluntarily agreed to abide by the European Federation of Pharmaceutical Industries and Associations (EFPIA) Code of Practice and supports the efforts of the Association of the British Pharmaceutical Industry (ABPI) Code of Practice to increase transparency in the pharmaceutical industry.

This methodological note is intended to accompany Alnylam Pharmaceuticals UK's disclosure of Transfers of Value ("ToV") and other benefits in kind with UK HCPs, HCOs and ORDMs. It provides guidance on how Alnylam Pharmaceuticals UK has recorded and reported these data. All data in the disclosure report were correct at the time of publication.

Alnylam makes every effort to disclose Transfers of Value to HCPs, HCOs and ORDMs in accordance with its commitment to the EFPIA Disclosure Code and the ABPI Code of Practice.

This note summarises the methodologies used by Alnylam in preparing disclosures in compliance with the EFPIA Disclosure Code and the ABPI Code of Practice.

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1 Definitions

1.1 Recipients

The ABPI Disclosure Code defines the following terms:

- **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 UK; or an organisation through which one or more HCPs or ORDMs provide services. This can also include a self-incorporated company set up by an HCP where the recipient is not the sole director of the company.
- **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 UK.
- **Other Relevant Decision Makers (ORDM):** Those with an NHS role who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply or use of any medicine but who are not health professionals.
- **Research and Development (R&D):** HCO/HCO Transfers of Value that relate to the planning and conduct of:
 - Non-clinical studies (as defined in OECD Principles on Good Laboratory Practice);
 - Clinical trials (as defined in Directive 2001/20/EC);
 - 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. This also includes investigator sponsored research (ISRs);
 - Non-interventional studies that are retrospective in nature have also been included within aggregate disclosure for R&D in this reporting year.
- **Third Party:** This means a legal person/entity or individual that represents a company or interacts with other parties on behalf of a company or relating to a company's medicine, such as distributors, wholesalers, consultants, contract research organisations, professional congress organisers, contracted sales forces, market research companies, advertising agencies, media buyers, providers of services related to events, public relations services, non-clinical services, non-interventional studies management services etc.
- **Transfer of Value (ToV):** Direct and indirect ToV (in payments or kind, or otherwise made) in connection with the development or sale of prescription-only medicinal products for human use whether for promotional services or otherwise.

1.2 Kind of ToVs

Alnylam discloses the following Transfers of Value it makes to HCOs:

- a. **Donations and Grants.** Donations and Grants to HCOs that support healthcare, including donations and grants (either cash or benefits in kind) to institutions, organisations or associations that are comprised of HCPs and/or that provide healthcare (governed by Article 12 of the EFPIA Code).
- b. **Contribution to costs related to Events.** Contribution to costs related to Events, through HCOs or third parties, including sponsorship to HCPs to attend Events, such as:
 - i. Registration fees.
 - ii. Sponsorship agreements with HCOs or with third parties appointed by an HCO to manage an Event; and
 - iii. Travel and accommodation (to the extent governed by Article 10 of the EFPIA Code).
- c. **Fees for Service and Consultancy.** ToV resulting from or related to contracts between Member Companies and institutions, organisations or associations of HCPs under which such institutions, organisations or associations provide any type of services to a Member Company, or any other type of funding not covered in the previous categories. Fees, on the one hand, and on the other hand ToV relating to expenses agreed in the written agreement covering the activity will be disclosed as two separate amounts.

Alnylam discloses the following Transfers of Value it makes to HCPs & ORDMs:

- a. **Congress and educational event registration fees:** Expenses related to the registration of an HCP or ORDM to attend a congress or educational event.
- b. **Travel:** Expenses related to the provision of travel to HCPs or ORDMs in relation to a fee for service contract (e.g., rail travel, taxi travel, flights, reimbursement of private car miles) or to their attendance at a congress or educational event.

Where travel expenses are required for the provision of a fee for service, these will be disclosed in the category of 'Related expenses agreed in the fee for service or consulting contract'. Where there is no provision of services, and they relate to contribution costs of a congress or educational event they will be disclosed in the category of 'Travel and accommodation'.

- c. **Accommodation:** Expenses related to the provision of overnight accommodation of HCPs or ORDMs in relation to a fee for service contract or to their attendance at a congress or educational event. Where they are required for the provision of a fee for service, these will be disclosed in the category of 'Related expenses agreed in the fee for service or consulting contract'. Where there is no provision of services, and they relate to contribution costs of a congress or educational event they will be disclosed in the category of 'Travel and accommodation'.
- d. **Meals and refreshments:** Directly reimbursed expenses related to the provision of meals and refreshments to HCPs or ORDMs in relation to their sponsorship for attendance at a congress or educational event will not exceed the mandated threshold of £75 per person, excluding VAT and

gratuities. Such expenses will not be disclosed as stated by the ABPI Code.

- e. **Fees:** ToV paid to Healthcare Professionals to provide services to Alnylam. These may include advisory board services, speaker services or other consulting services. Fees and ToV relating to expenses agreed in the written agreement covering the activity will be disclosed as two separate amounts, under the 'Fees' and the 'Related expenses agreed in the fee for service or consulting contract' categories.
- f. Where services for Alnylam are rendered by an HCP on behalf of an HCO (for example, Alnylam enters into a service contract with a HCO and the services are provided by the HCO's employee), the associated fees and expenses paid by Alnylam to the **HCP** are disclosed as Transfers of Value made to the **HCP** when consent has been collected. If consent was not collected, Alnylam will report these associated fees and expenses under the **HCO**.

Alnylam discloses Transfers of Value to HCPs and HCOs that relate to Research and Development

R&D includes ToVs related to pre-clinical and clinical development, paid to an HCO or an HCP directly or indirectly (for example through a CRO or third-party vendor).

All R&D ToVs are aggregated by country as a single number based on the recipient's country's principal practice address in the disclosure report. In case ToV relating to prospective and retrospective non-interventional studies cannot be distinguished, all non-interventional studies are disclosed on an individual basis under fee for service, where consent allows.

Market Research

Where the identity of an HCP participating in a market research project is known to Alnylam a ToV disclosure will be made at the individual HCP level.

Fee Payments to Charities

HCPs who have worked with Alnylam may ask for their fee to be paid to a charity. Alnylam does not encourage this type of fee payment and all payments are normally made directly to the HCP; where payment to a charity may occur, the disclosure is still made against the individual HCP.

Package Deals

Where a package deal involves the purchase of a medicinal product linked to associated benefits (e.g., homecare services, genetic testing), the transfer of value will be disclosed under the healthcare organisation (HCO) that delivers the service. Disclosure will follow the transparency requirements of the country where the HCO is domiciled.

2 Disclosure's Scope

2.1 Products concerned

This disclosure includes all Transfers of Value (ToV) related to our portfolio of Prescription-Only Medicines (POM).

2.2 Company concerned

Not applicable.

2.3 Excluded ToVs

ToVs in the following categories are not included in the disclosed information:

- Activities solely related to over-the-counter pharmaceutical products,
- Items of medical utility,
- Meals and drinks,
- Travel expenses in line with the threshold applicable to meals and drinks,
- Medical samples,
- Commercial activities that are part of ordinary course purchases and sales of medicinal products, or any other ToV which is out of the reporting scope, as defined by the EFPIA and ABPI Codes of Practice.

There are no disclosures related to Medical Devices.

2.4 ToVs date

This report details Transfers of Value that occurred during the full calendar year from 1 January 2025 to 31 December 2025.

2.5 Direct ToVs

Direct transfer of value is one made directly by a company for the benefit of a recipient.

2.6 Indirect ToVs

Indirect ToVs are provided to the recipient through a third party. In this situation, our partners are required by contract to share with the Company all information relating to ToVs in order to allow appropriate preparation of the disclosure.

2.7 Non-monetary ToVs

Any support, goods, or services provided to a Recipient that do not involve a direct payment of cash. These include, but are not limited to, travel bookings, hotel accommodations, and registration fees paid to third-party providers on behalf of the Recipient.

2.8 ToVs in case of partial attendances or cancellation and refund

Cancellations: If a Transfer of Value is cancelled before it occurs and no cost is incurred by the company, no disclosure is made. If the company incurs a **non-refundable cost** (e.g., a cancellation fee for a hotel or flight), this is generally **not** disclosed against the HCP, as they did not receive a personal benefit.

Partial Attendance: For events where an HCP only attended part of the programme, the company discloses the full registration fee and travel costs if they were paid in full and are non-divisible.

2.9 Cross-border activities

Alnylam UK has included details of cross-border ToVs arising from engagements by Alnylam affiliates outside the UK with UK-based HCPs.

All ToVs will be declared in pounds sterling (GBP). Where ToVs were made in other currencies, Alnylam UK will convert them into GBP using the appropriate daily exchange rate.

2.10 R&D

The R&D aggregate total includes transfers of value related to the planning and conduct of clinical and non-clinical research, including interventional trials and observational studies.

2.11 Voluntary disclosure

Our reporting methodology follows ABPI standards and guidelines for disclosure.

3 Specific considerations

3.1 Country unique identifier

A unique country identifier is provided for all Healthcare Professionals (HCPs) and Organisations (HCOs), subject to availability in official professional registers.

3.2 Self-incorporated HCP

If an HCP is the sole director of their own company, the payment is disclosed under the individual HCP's name. If the company has multiple directors, it is disclosed as an HCO.

3.3 Multi-year agreements

For contracts spanning multiple years, Transfers of Value are disclosed based on the actual date of payment. Only the amounts paid within the specific reporting period (1 January to 31 December) are included in this year's disclosure, regardless of when the contract was signed or the total duration of the project.

3.4 Country specificities

Not applicable.

3.5 Quality Checks

To ensure the accuracy of our disclosure, we follow a validation process. This included a financial reconciliation against our internal systems and identity verification.

4 Data protection legal basis

4.1 Consent collection

Alnylam fully supports the principles of transparency and abides by data privacy law. Data privacy law requires Alnylam to obtain explicit permission from individual HCPs or ORDMs prior to disclosing individual ToV to them. Alnylam makes every effort to obtain, and maintain a record of, the necessary permissions.

Where an HCP has not provided consent to disclose ToV, where Alnylam has not received a response on the issue of consent (and it is therefore assumed consent was not given) or where an HCP has withdrawn consent, ToV will be aggregated and disclosed. When declaring aggregated ToV, the total number of HCPs and total aggregated sum will be disclosed.

Where an HCP runs a limited company for the purposes of receiving private income, ToV to that organisation have been disclosed as a ToV to that HCP wherever possible. Where a payment is made to a larger organisation (e.g., a university), Alnylam will disclose the ToV against the organisation.

HCPs remain free to withdraw their consent for disclosure of data at any time by notifying Alnylam in writing and an HCP's decision on consent to disclose will not impact Alnylam's willingness to work with them.

- In the event that an HCP revokes consent prior to submission of data Alnylam will update the data and include the ToV for the corresponding HCP as aggregated.
- In the event that an HCP revokes consent after submission of the data, Alnylam will attempt to remove the personal data concerning ToV of the corresponding HCP as soon as possible.

4.2 Legitimate interests

Not applicable (consent is the basis used).

5 Form of disclosure

5.1 Date of publication

Tuesday, 30 June 2026

5.2 Disclosure platform

www.disclosureuk.org.uk

5.3 Disclosure language

British English

6 Disclosure financial data

6.1 Currency

Alnylam discloses ToVs to UK HCPs, HCOs and ORDMs in pounds sterling (GBP). Where ToVs are made in a currency other than GBP, the amount will be converted into GBP using the exchange rate applicable on the date of payment. Amounts disclosed in GBP may therefore vary slightly from the exact amount paid in the local currency.

6.2 VAT included or excluded

Where possible, Alnylam discloses the full amount of all ToV exclusive of VAT. In some instances, VAT may not be separable, in these cases, VAT has been included in the disclosure amount.

Where payment of taxes is due, they are the responsibility of the recipient of the ToV and not Alnylam Pharmaceuticals UK.

6.3 Calculation rules

Not applicable.

7 Additional Information

Not applicable.