

## Shionogi Disclosure Methodology

The below describes the methodology we use to include or exclude **Transfers of Value (ToVs)** made by Shionogi in our disclosures.

The definition of a ToV includes direct and indirect ToVs, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of a prescription only medicine (POM) exclusively for human use.

**Direct ToVs** are those made directly by Shionogi for the benefit of a Recipient.

**Indirect ToVs** are those made on behalf of Shionogi for the benefit of a Recipient, or those made through a Third Party (e.g., a meetings and events agency) and where Shionogi knows or can identify the Recipient that will benefit from the Transfer of Value.

### What payments do we disclose?

- Fees for service and related expenses, donations, and grants to Healthcare Organisations (HCOs), Sponsorships to HCOs/ Patient Organisations (POs).
- ToVs related to travel (e.g., flight ticket), accommodation (e.g., hotel room cost), reimbursement as part of fees for consultancy, payment to HCOs/HCPs as part of Research and Development (R&D) to be reported as an aggregate amount, and payment towards any Joint Working initiatives will be included in the calendar year in which we executed the actual payment or reimbursed it in our financial systems.
- In case of payments through a third party, our payment date to the third party is used as the determining factor to allocate the payment to the related calendar year.

Our aim is to have an efficient and fast processing of payment data, but whilst we update our systems, payment information could sometimes become available only after the date of publishing. We are striving to improve this situation and will monitor actual occurrences.

### How do we report ToVs related to multi-year contracts?

- In these cases, we use a split payment approach, so the total value is transferred in multiple, separate payments over time.
- Each of these separate payments will be included in the calendar year in which we executed the actual payment or reimburse it via our financial systems.

### Is VAT included?

- All payments (e.g., fees for service, Donations, Grants, Sponsorships, and other financial support), are reported exclusive of VAT.
- All ToVs from services or products (e.g., flight ticket, hotel room etc.) are reported gross, so inclusive of VAT where it is applicable

### How are different currencies handled?

- All values reported are in local currency, i.e., the currency of the country in which the disclosure is made.
- For ToVs that were originally made in non-local currency, a conversion to the local currency is made and exchange rate details can be provided on a case-by-case basis.

### What is reported in case of partial meeting attendance/cancellation?

- Only costs related to the partial participation are reported. Costs of cancellation prior the event are not reported as they do not constitute a value transfer to its recipients.

#### **What is reported in case the ToV is made to/through a third party?**

- In case an HCP is contracted and paid through an HCO that the HCP is part of, we will disclose the ToV under the name of the HCO that received the ToV, subject to local code differences.

#### **Legitimate Interest**

- During the year covered by this disclosure, Shionogi B.V. changed the lawful basis for individual disclosure from consent to legitimate interest. As this is a transitional year, there is a combination of consent and legitimate interest. 1 HCP was disclosed under legitimate interest.

#### **What is included in the aggregate disclosure section of the reporting template? (For countries where consent is required)**

- The HCP's aggregate section of the Disclosure reporting template contains the total value per cost type that was transferred to HCPs who have chosen not to be disclosed individually.
- According to individual privacy rights, consent to individual disclosure can be withdrawn by HCPs, in which case disclosure is made on an aggregate basis. We apply consent or withdrawal of consent per HCP for all ToVs on a per-activity basis.
- Partial Consent: As Shionogi collects consent on a per-activity basis, where recipients of transfers of value have decided to disclose as an individual in some activities and aggregate in others, the amount attributable to all transfers is disclosed on an aggregate basis.

#### **What address do we show in the ToV reports?**

- We will display the HCP, HCO, PO address available in our contract with the respective HCP, HCO, PO that we have in our database at the time of the reporting.

#### **R&D TOV reporting**

- We report by country and as one annual total amount in aggregate basis, for all R&D ToVs to HCPs and HCOs.
- R&D ToVs are ToVs to HCPs or HCOs related to the planning or conduct of (i) non-clinical studies (as defined in OECD Principles on Good Laboratory Practice); (ii) clinical trials (as defined in Directive 2001/20/EC); or (iii) 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
- Non-interventional retrospective studies are reported in HCO individual section of the ToV report.

#### **Cross Border Payments:**

- We operate in many countries across the globe and therefore, may contract HCPs from different countries to perform services in other markets outside the UK. Disclosure of these ToVs will be made in the recipient's home country (i.e., the country where the recipient has its primary place of practice or registration.)
- Similarly, payments made to the UK HCOs by Shionogi entities located in other countries are disclosed locally regardless of the source of funding.

#### **What do you do if you have identified an error in your ToV disclosed by Shionogi?**

Please contact us via [toveurope@shionogi.eu](mailto:toveurope@shionogi.eu) to request review and correction.

#### **Disclaimer**

We rely on a manual data entry from internal and external resources to record relevant data and finally report it. The information reported in this submission reflects our good faith and best efforts to comply with the requirements of the respective country Code, but we are striving to improve by the use of automated systems and standardised processes. Should we, despite our best efforts to ensure accurate reporting, fail to include complete and correct information in our submission, we will appropriately investigate and address in case of erroneous information.