

Regeneron UK Limited

Methodological Note for 2024 Disclosure Report

1. Purpose

The Association of British Pharmaceutical Industry (ABPI) Code of Practice requires member companies to publish a methodological note to accompany the disclosure of transfers of value each year.

Regeneron UK Limited (Regeneron UK) is a wholly owned subsidiary of Regeneron Pharmaceuticals, Inc.

2. Scope

This methodological note applies to the disclosure of transfers of value from 01 January 2024 to 31 December 2024. The disclosures provided by Regeneron UK will include:

- any transfers of value made by Regeneron UK to a Healthcare Professional, Healthcare Organization or Other Relevant Decision Maker (“Covered Recipients”) located in Europe to the extent Regeneron UK is not subject to disclosure reporting in that country; and
- any transfers of value made by any overseas affiliates of Regeneron UK (or by any other UK based Regeneron office or entity) to Covered Recipients located in the UK.

Regeneron UK will provide disclosures related to transfers of value made directly or indirectly through our accounting systems. Transfers of value made by collaboration or co-promotion partners should be included in their disclosure report.

3. Definitions

Healthcare Professional:

A Healthcare Professional (HCP) is:

- Any medical, dental, pharmacy or nursing profession and any other person who in the course of their professional activities may administer, prescribe, purchase, recommend or supply a medicine;
- Any employee of a pharmaceutical company whose primary occupation is that of a practicing HCP.

Healthcare Organization:

A Healthcare Organization (HCO) is any legal entity:

- That is a healthcare, medical or scientific association or organization (irrespective of the legal or organizational form), such as a hospital, clinic, foundation, university or other teaching institution or learned society whose business address or place of incorporation is in Europe; or
- Through which, one or more HCPs provide healthcare services, including private primary healthcare providers.

Other Relevant Decision Maker:

An Other Relevant Decision Maker (ORDM) is a person with a National Health Service (“NHS”) role who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale supply or use of any medicine but who is not an HCP.

Transfer of Value:

Transfer of Value (ToV) means a direct or indirect transfer of value, whether in cash, in-kind or otherwise, made in connection with the development or sale of medicines (whether or not for promotional purposes).

4. Legal Basis for Processing and Disclosing ToV Data

Regeneron UK will rely on the Legitimate Interest as the legal basis for processing and disclosing ToV data for HCPs and ORDMs in accordance with Articles 15-21 of the General Data Protection Regulation (EU) 2016/679 (GDPR) as implemented in national legislation in the UK and the UK Data Protection Act 2018.

Regeneron UK believes that the publication of this data serves an important purpose in instilling public confidence in the integrity and independence of HCPs and ORDMs relationships with the pharmaceutical industry and that these relationships do not inappropriately influence clinical decisions.

Regeneron UK provides HCPs and ORDMs with notification surrounding how and why their personal information will be processed and disclosed with instructions to contact DataProtection@Regeneron.com if they wish to “opt out” of disclosure on an identifiable basis.

To the extent Regeneron UK has engaged with a HCP or ORDM in a country outside of the UK where Legitimate Interest is not a legal basis of disclosure and such ToV qualifies for disclosure on this report, Regeneron UK will respect the legal basis applicable in the respective country.

5. Reportable ToVs

The following categories of reportable ToVs were identified during the period 01 January 2024 through 31 December 2024:

Contracted Services: Payments for fees and expenses paid for contracted services to HCPs and ORDMs, or to their employers on their behalf.

Sponsorships: Payments for sponsorships include contributions to costs related to events/meetings paid to HCOs or to PCOs, which may include support of HCPs not known to the company via the HCO by way of registration fees, accommodation, and travel.

Research and Development: Payments made for Research and Development activities are disclosed in aggregate. The EFPIA Disclosure Code and the ABPI Code defines these activities as ToVs to HCPs or HCOs related to the planning or conduct of:

- non-clinical studies (as defined in OECD Principles on Good Laboratory Practice);
- clinical trials (as defined in Directive 2001/20/EC); or
- 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.

6. Accounting

Currency: ToVs will be reported in GBP. If a payment was not made in GBP it will be converted to GBP utilizing a reasonably established methodology.

Tax: ToVs will be reported at amounts paid. Applicable taxes are the responsibility of the individual or entity receiving the payment.

ToV Date: The ToV date represents actual date of payment and not date of service should these dates differ.

7. Contacts

Data Protection:

For data protection inquiries, please contact DataProtection@Regeneron.com

Media Inquiries:

For media inquiries, please contact media@regeneron.com

Global Transparency:

For inquiries related to this methodological note or ToV disclosure, please contact aggspend@regeneron.com