REGENERON
SCIENCE TO MEDICINE®

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Country: United Kingdon

Regeneron UK Limited: Methodological note for HCP/ORDM/HCO disclosure 2025

Data year: 2025

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Contents

1 Definitions

1.1 Recipients

Covered Recipient:

A Covered Recipient is a Healthcare Professional, Healthcare Organization or Other Relevant Decision Maker.

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.

HCPs may include recently deceased and retired HCPs:

- In respect of recently deceased HCPs, such HCPs are disclosed on an individual basis unless Regeneron is contacted with an objection by that HCP's next-of-kin or employer.
- In respect of retired HCPs, such HCPs are disclosed on an individual basis, unless an individual exercises their right to object as discussed in section 4.2 below.

Healthcare Organization:

A Healthcare Organization (HCO) 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, place of incorporation or primary place of operation is in Europe; or

- An organisation through which one or more HCPs or Other Relevant Decision Makers provide healthcare services, including private primary healthcare providers.

If a HCO consists of only one HCP or Other Relevant Decision Maker, then it is considered a HCP for the purposes of this note.

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.

ORDMs may include recently deceased and retired ORDMs:

- In respect of retired ORDMs, such ORDMs are disclosed on an individual basis unless Regeneron is contacted by that ORDM's next-of-kin or employer with an objection.
- In respect of recently deceased ORDMs, such ORDMs are disclosed on an individual basis, unless an individual exercises their right to object.

1.2 Kind of ToVs

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).

The following categories of reportable ToVs (Reportable ToVs) were identified during the period 01 January 2025 through 31 December 2025:

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 organisations managing events on behalf of HCOs, which may include support of HCPs not known to Regeneron via the HCO by way of registration fees, accommodation, and travel.

Collaborative Working, including joint working: Payments for working with other organisations to deliver initiatives which either enhance patient care or are for the benefit of patients or alternatively benefit the National Health Service (NHS) and, as a minimum, maintain patient care.

Research and Development: Payments made for Research and Development activities are disclosed in aggregate. The ABPI Code of Practice 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.

This may include ToVs related to investigator meetings for clinical trials and non-interventional studies, and Independent Data Monitoring Committees.

2 Disclosure's Scope

2.1 Products concerned

The product classifications included in the disclosure are related to prescription only medicines.

2.2 Company concerned

The report contains data related to Regeneron UK Limited (Regeneron UK). Regeneron UK is a wholly owned subsidiary of Regeneron Pharmaceuticals, Inc. The disclosures provided by Regeneron UK will include:

- any transfers of value made by Regeneron UK to 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 and its overseas affiliates are together referred to as Regeneron below.

2.3 Excluded ToVs

Transfers of value that are not included in the disclosure include:

- transfers of value made by collaboration and co-promotion partners that should be included in the disclosure report of the relevant co-promotion partner;
- ordinary course purchases and sales of medicines by and between Regeneron to a HCP or HCO;
- samples of medicines provided to a HCP in accordance with Clause 21 of the ABPI Code of Practice;
- inexpensive pens, pencils and notepads (total cost not to exceed £6 excluding VAT) when either required for use by attendees of events / meetings organized by Regeneron in accordance with Clause 10.5 of the ABPI Code of Practice, or provided in conference bags at independently organized meetings in accordance with Clause 10.6 of the ABPI Code of Practice;
- materials and items for patient support to be passed onto patients in accordance with Clause 19.2 of the ABPI Code of Practice; and
- subsistence provided to HCPs and ORDMs at events / meetings in accordance with Clause 10.1 of the ABPI Code of Practice (this does not include costs for subsistence when providing sponsorship of events/meetings to HCOs which is included as a ToV); and
- payments made to contracted individuals in relation to market research, where Regeneron does not know the identities of those participating in the market research.

Transfers of value to patient organisations and members of the public, including patients and journalists, are covered by a separate methodological note for disclosure.

2.4 ToVs

This methodological note applies to the disclosure of transfers of value from 01 January 2025 to 31 December 2025.

2.5 Direct ToVs

A direct transfer of value is one made directly by Regeneron UK or any oversees affiliate of Regeneron UK to a Covered Recipient, for the benefit of that Covered Recipient. This

typically includes ToVs directly to Covered Recipients in respect of the following types of activities: Contracted Services, Sponsorship, Collaborative Working and Research and Development.

2.6 Indirect ToVs

An indirect transfer of value is one made on behalf of Regeneron UK or any oversees affiliate of Regeneron UK for the benefit of a Covered Recipient or through an intermediate where the identity of the Covered Recipient benefiting from the transfer of value is known or can be identified.

ToVs made to Professional Conference Organisers (PCOs) are disclosed under the end Covered Recipients (HCPs, ORDMs or HCOs) if they are clearly identifiable and the exact values transferred to them are made available by the PCOs.

Where third parties are appointed by Regeneron to make travel and accommodation arrangements for HCPs or ORDMs who are providing services or who are supported to attend events, these ToVs are disclosed against the HCP or ORDM.

When Regeneron contracts with an HCO that sub-contracts services to HCPs or ORDMs, Regeneron discloses the ToV against the HCO, unless Regeneron has influenced the selection of the HCP or ORDM to provide the services, in which case the ToV is disclosed against the HCP or ORDM.

2.7 Non-monetary ToVs

Non-monetary ToVs include time spent by internal staff on collaborative working arrangements. Regeneron will estimate a monetary value of the ToV to attribute to the Covered Recipient.

2.8 ToVs in case of partial attendances or cancellation and refund

Where a Covered Recipient does not receive the ToV due to a no show or a cancellation of event, the associated costs are not reported, such as the cost of cancelling a hotel booking or accommodation.

In case of partial attendance/ service provided, only the ToVs actually received / provided are reported.

Where Regeneron must pay cancellation fees to a Covered Recipient in accordance with service agreements, due to cancellation of initiatives or events, these payments are reported.

2.9 Cross-border activities

The disclosures provided by Regeneron UK will include:

- any transfers of value made by Regeneron UK to a 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.

2.10 R&D

The disclosure includes the activities specified as Research and Development in section 1.2 above.

2.11 Voluntary disclosure

Not Applicable

3 Specific considerations

3.1 Country unique identifier

Not Applicable

3.2 Self-incorporated HCP

ToVs to Healthcare Professionals with their own separate legal entity (e.g. a limited company) are disclosed in the name of the Healthcare Professional.

3.3 Multi-year agreements

ToVs are reported based on payment date. Payments related to multi-year agreements may be reported in separate reports.

3.4 Country specificities

Where Regeneron works with other pharmaceutical companies, each company reports the ToVs relating to the activities that they organised. For jointly organised events, the companies agree in advance which ToVs will be reported by each company. This avoids duplicate reporting for joint activities.

3.5 Quality Checks

Pre-disclosure quality checks are integral to ensuring the accuracy, completeness, and compliance of data before public submission. The key areas covered include:

- **Validation of data accuracy**: Ensuring all ToV are correctly recorded and categorized.
- **Compliance with legal and ethical standards**: Adhering to privacy and transparency regulations.
- **Consistency checks**: Cross-referencing data to ensure no duplication or omission.

To assist with checking and managing disclosures, Regeneron has engaged individuals on the Corporate Compliance team who are responsible for the above.

4 Data protection legal basis

4.1 Consent collection

Regeneron UK relies on its Legitimate Interests as the legal basis for processing and disclosing individual-level ToV data for HCPs and ORDMs in accordance with Article 6 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.

4.2 Legitimate interests

Pursuant to a legitimate interests assessment conducted by Regeneron UK, the publication of this data is necessary for Regeneron's legitimate interests 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; enabling better public scrutiny of financial transactions; and compliance with the ABPI Code of Practice.

Regeneron UK provides HCPs and ORDMs with transparent information on how and why their personal information will be process and disclosed in its privacy notice hcp-privacy-

notice.pdf], with instructions to contact DataProtection@Regeneron.com if they wish to exercise the right to object to disclosure on an identifiable basis.

Where a HCP exercises their right to object, Regeneron must consider any reasons put forward by the HCP and balance them against Regeneron's legitimate interests. The HCP will be informed of the decision regarding such objection. Where an objection is considered to override Regeneron's legitimate interests, then Regeneron will only be able to publish the relevant ToV anonymously, in aggregate.

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 Form of disclosure

5.1 Date of publication

The date of publication for 2025 disclosures is 30 June 2026 in line with the ABPI Code of Practice.

5.2 Disclosure platform

Disclosure UK – www.disclosureuk.org.uk

5.3 Disclosure language

English

6 Disclosure financial data

6.1 Currency

Currency: ToVs will be reported in GBP. If a payment was not made in GBP, it will be converted to GBP utilizing exchange rates from XE Currency Converter, using a historic rates endpoint for precise average daily exchange rates.

6.2 VAT included or excluded

ToVs will be reported at amounts paid, including VAT if applicable. Applicable taxes are the responsibility of the individual or entity receiving the payment.

6.3 Calculation rules

The date recorded against each ToV determines the ToV reporting period. The ToV date recorded by Regeneron is the payment.

When calculating non-monetary ToVs, for example in situations where Regeneron contributes the time of its staff to Collaborative Working, Regeneron calculates the hourly rate of the relevant staff member and multiples that hourly rate by the number of hours spent by the staff member on that project, with the figure resulting from this calculation representing the nominal benefit-in-kind ToV made by Regeneron to the Covered Recipient.

7 Additional Information

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