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Country: UK

## **Ascendis Pharma UK Limited Methodological note for HCP/ORDM/HCO disclosure 2025**

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Ascendis Pharma UK Limited (Ascendis Pharma) is applying its innovative platform technology to build a leading, fully integrated biopharma company focused on making a meaningful difference in patients' lives. Guided by our core values of patients, science and passion, we use our TransCon® technology to fulfil our mission of developing new and potentially best-in-class therapies that address unmet medical needs.

As part of fulfilling this mission, we work with UK Healthcare Professionals (HCPs), Healthcare Organisations (HCOs), and Other Relevant Decision Makers (ORDMs) to collect their independent and valuable advice, to exchange scientific information and to share information about Ascendis Pharma and our medical products.

Ascendis Pharma is committed to transparency in our collaboration with UK HCPs, HCOs and ORDMs, and we report applicable Transfers of Value (ToVs) to these recipients in alignment with the ABPI Code.

In this methodological note, we will present relevant details on our approach to reporting the ToVs provided to UK HCPs, HCOs and ORDMs.

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## 1 Definitions

### 1.1 Recipients

Term	Definition
<b>Healthcare Organisation (HCO)</b>	<p>Any legal entity that is a healthcare, medical or scientific association or organisation (irrespective of the legal or organisational form) such as a hospital, clinic, foundation, university, or other teaching institution or learned society (except for Patient Organisations), or through which one or more HCPs provide medical services. Healthcare Organisations also includes Healthcare Institutions (HCI).</p> <p>This also includes any organisation through which, in addition to HCPs, any relevant decision maker provides services.</p> <p>Patient Organisations are not considered to be HCOs and are separately included in the Patient Organisation report displayed on the Ascendis Pharma website:</p> <p><a href="#">Transparency   Ascendis Pharma UK</a></p>
<b>Healthcare Professional (HCP)</b>	Any natural person that is 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 medical products.
<b>Other Relevant Decision Maker (ORDM)</b>	Someone with an NHS (National Health Service) role who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply or use of any medicine but who is not defined as an HCP.
<b>Patient Organisation (PO)</b>	Organisation (including the umbrella organisation to which they belong), mainly composed of patients and/or caregivers that represent and/or support the needs of Patients and/or caregivers.

Retired HCPs or ORDMs will be disclosed as if they were still practising/working. In such cases, 'N/A' will be added to the institution field.

### 1.2 Kind of ToVs

Category	Description
<b>Collaborative working</b>	Collaboration between Ascendis Pharma and other UK pharmaceutical companies, HCOs and other organisations with the purpose of enhancing patient care will be disclosed as collaborative working in line with such requirements.
<b>Contracted services</b>	Ascendis Pharma may contract UK HCPs, HCOs and ORDMs to provide services in alignment with clause 24, e.g., to collect expert input not available internally in Ascendis Pharma. The fees and related expenses will be disclosed separately, if possible.

Category	Description
<b>Delegate support/support of attendance in event</b>	Ascendis Pharma can sponsor/support HCPs' and ORDMs' attendance in legitimate events. The ToVs will be disclosed as contributions to costs of events with further specification of the ToVs as registration fee, travel and accommodation.
<b>Grants and donations</b>	<p>Grants and donations are provided to UK HCOs with the purpose of supporting healthcare, research and education.</p> <p>Ascendis Pharma has established a process for review and approval of all requests for grants and donations. This process includes a compliance review aimed to ensure that applicable requirements are followed, including Clause 23 in the ABPI Code. See the Ascendis Pharma definition of grants and donations in section 6.</p>
<b>Research and development ToVs</b>	<p>Research and development ToVs provided to UK HCPs and HCOs related to planning or conducting of below activities will be disclosed in aggregate.</p> <ul style="list-style-type: none"> <li>• Non-clinical studies (as defined in the OECD Principles of Good Laboratory Practice).</li> <li>• Clinical trials (as defined in Regulation 536/2014).</li> <li>• Non-interventional studies that are prospective in nature and involve the collection of patient data from or on behalf of individuals or groups of HCPs specifically for the study.</li> </ul> <p>A process for collection of research and development ToVs is established that includes collection of data from our CROs (Clinical Research Organisations).</p>
<b>Sponsorships of events</b>	<p>Ascendis Pharma are sponsoring events organised by UK HCOs, POs and other independent organisations often with the objective of executing scientific and/or promotional activities, e.g., a booth or presentation. Such sponsorships will be disclosed as sponsorship agreements under the name of the ultimate beneficiary.</p> <p>Corporate memberships of medical societies, where funding is provided to support organization of legitimate events and meetings, will be disclosed as sponsorships.</p> <p>See the Ascendis Pharma definition of sponsorships in section 6.</p>

## 2 Disclosure scope

### 2.1 Products concerned

Ascendis Pharma develops and markets prescription only medicines, and interactions with HCPs, HCOs and ORDMs relate exclusively to these products. Accordingly, only ToVs associated with prescription medicines are included in this disclosure.

### 2.2 Company concerned

Ascendis Pharma will disclose ToVs provided to UK HCPs, HCOs and ORDMs by Ascendis Pharma A/S and/or its affiliates.

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### 2.3 Excluded ToVs

In accordance with the EFPIA Disclosure Code and the ABPI Code of Practice, Ascendis Pharma does not disclose the following items:

- i. Over-the-counter medicines, items of medical utility and meals and drinks.
- ii. Medical samples purchases and sales of Medicinal Products by and between a Member Company and an HCP, HCO or ORDM.
- iii. ToV related to investigational compounds and biological samples.
- iv. External and internal Ascendis Pharma trainings where Ascendis Pharma invites HCPs to participate (without any additional money transfer or cover of expenses).

Where Ascendis Pharma provides a benefit in kind to an HCO, but the benefit in kind does not result in a permanent enrichment of the HCO, e.g., loan of (laboratory) equipment to a hospital in connection with and for the purpose of the HCO's conduct of a clinical trial, such benefit in kind is not disclosed.

### 2.4 ToVs date

Ascendis Pharma will disclose ToVs based on the date the value was provided, covering the full period 1 January 2025 to 31 December 2025.

### 2.5 Direct ToVs

Direct ToVs are payments made by Ascendis Pharma or its affiliates to the UK HCPs, HCOs and ORDMs.

### 2.6 Indirect ToVs

Indirect ToVs are payments made by a third party on behalf of Ascendis Pharma to the UK HCPs, HCOs and ORDMs.

### 2.7 Non-monetary ToVs

Currently not applicable.

### 2.8 ToVs in case of partial attendances or cancellation and refund

Where an HCP, HCO or ORDM does not receive the benefit due to a no-show or event cancellation, the associated expenses (e.g., flight or hotel cancellation costs) are not reportable. If the individual attends only in part, or the service is only partially provided, reporting is limited to the benefits actually received.

### 2.9 Cross-border activities

Ascendis Pharma has established a process to ensure that activities organised across borders are conducted in a compliant manner. Therefore, no matter which legal entity within Ascendis Pharma A/S is providing the ToV to a UK HCP, HCO or ORDM, it will be captured and disclosed accordingly.

### 2.10 R&D

All Transfers of Value related to Research & Development activities – including those performed directly by Ascendis Pharma, by contractors not in permanent roles, or by Clinical Research

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Organisations acting on behalf of Ascendis Pharma – are disclosed on an aggregate basis. This includes:

- Non-clinical studies, as defined in the OECD Principles of Good Laboratory Practice.
- Clinical trials, as defined in Regulation (EU) 536/2014.
- Prospective non-interventional studies that involve the collection of patient data from, or on behalf of, individual health professionals or groups of health professionals specifically for the study.

Meetings conducted in connection with Ascendis Pharma clinical trials, where investigators or study-site personnel are invited for trial-specific activities, are always categorised as R&D Transfers of Value. Investigator Meetings are organised by or on behalf of Ascendis Pharma to provide training and information to investigators and site staff on the scientific and operational conduct of the clinical trial.

### 2.11 Voluntary disclosure

Not applicable.

## 3 Specific considerations

### 3.1 Country unique identifier

In line with PMCPA guidance, Ascendis Pharma does not submit publicly available professional identifiers (such as GMC, NMC or GPhC numbers) to Disclosure UK, as these cannot be published in the UK system.

### 3.2 Self-incorporated HCP

Where an HCP or ORDM provides services through their own limited company, any ToV made to that entity is disclosed against the individual HCP/ORDM.

### 3.3 Multi-year agreements

ToVs provided as part of multi-year agreements will be disclosed in the year when the individual ToV is paid.

### 3.4 Country specificities

Not applicable.

### 3.5 Quality checks

Before submitting ToVs to Disclosure UK, Ascendis Pharma undertakes a series of internal quality checks to ensure the accuracy and completeness of the data. These checks include verification of source documentation, reconciliation of payments recorded in financial systems with contracted activities, validation of recipient details against internal records, and review of data uploaded from third-party providers or systems.

Before submitting ToVs to Disclosure UK, Ascendis Pharma conducts a pre-disclosure process to ensure transparency and allow HCPs and ORDMs to review their data in advance.

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## 4 Data protection legal basis

### 4.1 Consent collection

Consent has not been sought from individuals. As for TOVs made to HCPs/ORDMs, disclosure is made based on a Legitimate Interest.

When processing any personal data based on this basis, it is the priority of Ascendis Pharma to maintain a balance between our Legitimate Interest and the HCPs'/ORDMs' privacy.

### 4.2 Legitimate interests

Personal data is processed, used, transferred and disclosed in accordance with all applicable data protection laws and regulations.

We will disclose ToVs provided to UK HCPs and ORDMs individually, and we use Legitimate Interest as our lawful basis to make this disclosure. The HCPs and ORDMs are informed about this in the agreements we enter with them.

The disclosed information will be made public for three years counting from the day of the disclosure.

## 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 for the Pharmaceutical Industry.

### 5.2 Disclosure platform

All UK disclosure data relating to HCPs, HCOs and ORDMs will be hosted on the ABPI Central Platform:

<https://www.abpi.org.uk/reputation/disclosure-uk>

### 5.3 Disclosure language

Disclosure is made in English.

## 6 Disclosure financial data

### 6.1 Currency

Disclosure of ToVs will be made in GBP. If payments are made in another currency, these will be manually converted to GBP when the ToV is tracked in the internal Ascendis Pharma disclosure process.

### 6.2 VAT included or excluded

ToV amounts will be disclosed excluding tax, if administratively possible.

### 6.3 Calculation rules

Not applicable.

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## 7 Additional information

Not applicable.