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Country: United Kingdom

# Incyte Biosciences UK Limited: Methodological note for HCP/ORDM/HCO disclosure 2025

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Incyte Biosciences UK Ltd (hereinafter referred to as “Incyte”) fully supports the transparency requirements set out in the Association of the British Pharmaceutical Industry (ABPI) Code of Practice and is committed to making public the details of all transfers of value (ToV) made to healthcare professionals (HCPs), healthcare organisations (HCOs) and, other relevant decision makers (ORDMs).

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## Definitions

### Recipients

For the purpose of Disclosure, Incyte reports Transfers of Value (ToVs) to all individuals and organisations that meet the PMCPA definitions of HCPs, ORDMs and Healthcare Organisations HCOs.

- **Healthcare Professionals (HCPs)**

A Healthcare Professional is defined as any member of the medical, pharmacy or nursing professions, or any other individual who, in the course of their professional activities, may administer, prescribe, purchase, recommend, or supply a medicine.

This definition includes:

- **HCPs currently practising**
- **Retired HCPs**, where the individual continues to provide services to Incyte based on their professional expertise or qualifications
- **Deceased HCPs**, where ToVs were made *during the period in which the HCP was alive and contractually engaged*

## **ORDMs**

An ORDM is any individual who may influence, directly or indirectly, the administration, consumption, prescription, purchase, recommendation, sale, supply, or use of a medicine, but who does not meet the definition of an HCP.

## **HCOs**

A HCO refers to any healthcare, medical, or scientific association or organisation—such as a hospital, clinic, foundation, university, teaching institution, or learned society—whose business address, place of incorporation, or primary place of operation is in the UK.

This definition also includes legal entities owned by HCPs or ORDMs through which they provide contracted services, and which therefore function as HCOs for reporting purposes.

## **Recipient Determination**

Incyte considers the contracting entity to be the ToV recipient for disclosure purposes. Accordingly, the recipient reported is the party named as the counterpart on the contractual agreement, which may be:

- an individual HCP
- an individual ORDM
- an HCO
- a legal entity owned by an HCP/ORDM (classified as an HCO)

## **Treatment of Retired and Deceased HCPs and ORDMs**

Incyte has not had any instances involving retired or deceased HCPs/ORDMs during the reporting period.

If such cases were to occur, Incyte would follow PMCPA guidance:

- **Retired HCPs/ORDMs:** ToVs would be disclosed in the same way as for active HCPs/ORDMs, provided the services were performed during the reporting period.
- **Deceased HCPs/ORDMs:** In line with PMCPA guidance, ToVs would be reported only if they occurred while the individual was alive and engaged under contract. No ToVs would be attributed after death.

## Kind of ToVs

Incyte discloses all categories of Transfers of Value (ToVs) required under the ABPI Code. The following types of ToVs may be included in Incyte's disclosure:

- **Donations and Grants**  
Financial or in-kind support provided to HCOs for healthcare or scientific purposes.
- **Contribution to Costs of Events**  
Support provided for HCP/ORDM attendance at scientific or educational events, including registration fees, travel and accommodation where applicable.
- **Contracted Services (Fees and Expenses)**  
Payments to HCPs, ORDMs or HCOs for services such as advisory boards, consultancy, speaking engagements, expert input or similar contracted activities. Associated expenses (e.g., travel) are also included.
- **R&D ToVs**  
Transfers of Value related to non-clinical studies, clinical trials and non-interventional studies that meet the ABPI definition of R&D. These are disclosed in aggregate.
- **HCO Support/Sponsorship**  
Financial support provided directly to HCOs for scientific or medical education activities.
- **Collaborative Working**  
Incyte engages in Collaborative Working initiatives as defined under the ABPI Code. Any associated Transfers of Value are disclosed accordingly.

## Disclosure's Scope

### Products concerned

The disclosure covers activities related to Prescription Only Medicines (POMs).

### Company concerned

This disclosure relates to Incyte Biosciences UK and includes all ToVs made by Incyte Corporation and all Incyte affiliates worldwide, where the ToV is provided to a UK-based HCP, ORDМ or HCO.

Any ToV originating from any Incyte entity, regardless of location, contracting party or paying company, is included whenever the recipient is UK-based.

All such ToVs are consolidated into a single UK disclosure and are not published separately by individual affiliates.

## Excluded ToVs

Incyte discloses all Transfers of Value required under the ABPI Code and PMCPA disclosure requirements. In line with Clause 1.25 of the ABPI Code, only Transfers of Value explicitly exempt from disclosure are excluded.

## ToVs date

The disclosure covers all Transfers of Value made during the period 1 January 2025 to 31 December 2025, in accordance with ABPI Code and PMCPA disclosure requirements.

## Direct ToVs

Incyte captures Direct Transfers of Value where the payment or benefit is provided directly to an HCP, ORDM or HCO.

For the reporting period, the types of direct ToVs applicable to Incyte include:

- **Fees for contracted services**  
Payments made directly for activities such as advisory boards, consultancy, speaking engagements or expert input.
- **Associated expenses**  
Reimbursed expenses directly paid to the HCP or ORDM in connection with contracted services (e.g., travel or accommodation).
- **Sponsorship or support to HCOs**  
Direct financial support provided to HCOs for scientific or medical education activities.
- **Grants and donations to HCOs**  
Direct monetary or in-kind support provided for legitimate healthcare or scientific purposes.

These ToVs are disclosed in accordance with ABPI and PMCPA requirements. No other categories of direct ToVs apply to Incyte's activities.

## Indirect ToVs

Incyte captures indirect Transfers of Value where a benefit is provided to an HCP or ORDM **via a third party** rather than directly by Incyte.

For the reporting period, the only indirect ToVs applicable to Incyte are those made through third-party agencies for:

- **HCP travel,**
- **HCP accommodation,** and

- **HCP registration fees**

linked to scientific or educational meetings.

These ToVs are disclosed as indirect Transfers of Value in accordance with ABPI and PMCPA requirements. No other types of indirect ToVs apply to Incyte's activities.

## Non-monetary ToVs

N/A

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

N/A

## Cross-border activities

Incyte discloses all ToV from cross-border activities in accordance with the PMCPA requirements.

## R&D

Incyte reports Research & Development (R&D) Transfers of Value in accordance with the ABPI Code definition, which includes ToVs related to:

- Non-clinical studies
- Clinical trials
- Non-interventional studies

These activities are disclosed in aggregate, as required by the ABPI Code.

## Voluntary disclosure

N/A

## Specific considerations

### Country unique identifier

Incyte uses a commercial identifier to support accurate internal matching and reconciliation of HCP, ORDM and HCO data. This identifier is also submitted to Disclosure UK as part of the upload process, but it is not publicly disclosed and does not appear in the published dataset.

### Self-incorporated HCP

Incyte discloses ToVs made to self-incorporated HCPs by reporting the payment to the Limited company, which is treated as an HCO for disclosure purposes, in accordance with Clauses 1.8 and 1.25 of the ABPI Code.

## Multi-year agreements

For multi-year agreements, Incyte discloses ToVs in the year in which the Transfer of Value occurs, rather than by the total contractual value or duration of the agreement. Only ToVs made or provided within the reporting period are included in the annual disclosure.

## Country specificities

N/A

## Quality Checks

Incyte carries out internal quality checks to ensure the accuracy and completeness of all ToV data before submission to Disclosure UK. This includes review at UK level and coordination with the wider Incyte organisation, followed by internal leadership approval. These steps ensure that data is consistent and compliant with reporting requirements.

## Data protection legal basis

### Consent collection

Incyte will disclose any ToV upon the lawful basis of pursuing its legitimate interests

### Legitimate interests

#### **Appropriate Arrangements and Recipient Awareness**

Incyte has processes in place to ensure lawful, fair and transparent processing of personal data.

Recipients are informed of ToV disclosure requirements and the use of Legitimate Interests through:

- Contractual documentation, and/ or
- Privacy notices

#### **Legitimate Interests Balancing Test**

Incyte has conducted a Legitimate Interests Assessment (LIA) which confirms that disclosure:

- is necessary to meet industry transparency requirements that Incyte or its affiliates have adhered to,
- involves minimal and non-sensitive personal data,
- supports public and patient expectations for transparency, and is instrumental to increase public and patients' trust in the usefulness and correctness of the collaboration between the healthcare world and the pharmaceutical industry,

- is reasonably expected by HCPs and ORDMs engaging with pharmaceutical companies, and
- HCPs are given the opportunity to object to these disclosures (see below wording on right to object and handling objections).

The assessment concludes that Incyte's legitimate interest in transparency does not override the rights or freedoms of individuals.

### **Right to Object and Handling of Objections**

Under UK GDPR, individuals have the right to object to processing based on Legitimate Interests.

Requests can be submitted to:

[Transparency\\_UK@incyte.com](mailto:Transparency_UK@incyte.com)

Where an objection is upheld, the individual's ToVs are not published at a named level and are included in the aggregate disclosure, in accordance with PMCPA requirements.

## Form of disclosure

### Date of publication

30/06/26

### Disclosure platform

Disclosure UK – [www.disclosureuk.org.uk](http://www.disclosureuk.org.uk)

### Disclosure language

English

## Disclosure financial data

### Currency

Incyte has made its disclosures in British pound sterling (GBP). For ToVs made in other currencies, the GBP exchange rate applicable at the time of payment was used to convert the value for disclosure.

### VAT included or excluded

Incyte has made its disclosures inclusive of all applicable taxes where applicable. Grants and Donations are excluding VAT.

### Calculation rules

N/A

## Additional Information

N/A