



**Methodological Notes - Disclosure of Transfers of Value to Healthcare
Professionals, Patient and Healthcare Organisations (2025)
KalVista UK Limited**

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Summary

As an ethical pharmaceutical company, and in accordance with Clause 28 of the ABPI Code of Practice 2024, KalVista UK Limited has clear and concise standard operating procedures in place for the assessment, approval, and processing of all transfer of value to healthcare professionals and healthcare organisations. These declarations cover all persons and entities to whom transfers of earnings were paid, where their primary function, job, or role, is that of a healthcare professional or healthcare organisation, such as Physicians, Nurses, Pharmacists, Trusts etc.

All such requests for financial support from healthcare professionals and healthcare organisations are assessed on a case-by-case basis to ensure the ABPI Code of Practice is adhered to and in line with FMV (fair market value) for the UK.

Unless organised and paid for directly by KalVista UK Limited, where at all possible, contributions towards events made at the request of a healthcare professional or organisation are only paid to hospital, company, or charity accounts, and not directly to the HCP requesting the support. Where at all possible, HCP travel and accommodation is paid for directly by KalVista UK Limited, and not the healthcare professional directly.

In the case of fees for professional services, consultancy, speaker fees etc, payments are made directly to the individual unless the fee has been specifically requested to be made to a hospital, company or charity account.

All figures included are exclusive of VAT

KalVista UK Limited fulfils all of its tax obligations but is not responsible for the tax obligations of the individuals or entities benefitting from the payments.

In the interests of transparency, KalVista UK has also included payments made to UK HCPs and/or HCOs made by KalVista Group companies.

1. Definitions

Healthcare Professional (HCP)	Anyone that is a member of the medical, dental, pharmacy or nursing professions and any other professional that may administer, prescribe, purchase, recommend or supply a medicine.
Healthcare Organisation (HCO)	A healthcare, medical or scientific association or organisation such as a hospital, clinic, foundation, university, or other teaching institution or learned society, or an entity through which an HCP (as defined above) or other relevant decision makers provide a service.
Other Relevant Decision Maker (ORDM)	The term 'other relevant decision maker' particularly includes those with an NHS role who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply or use of any medicine but who are not health professionals
Patient Organisations (PtOrgs)	An organisation mainly comprising of patients and/or caregivers or any user organisation such as a disability organisation, carer or relative organisation and consumer organisation that represents and/or supports the needs of patients and/or caregivers.
Professional Conference Organiser (PCO)	A company which specialises in the organisation and management of congresses, conferences, seminars and similar events.
Transfer of Value (ToV)	Direct and indirect transfers of value, whether payments, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of prescription-only Medicinal Products exclusively for human use. Direct transfers of value are those made directly on behalf of a Member Company for the benefit of a Recipient, or transfers of value through an intermediate or where the Member Company knows or can identify the HCP/HCO that benefit from the Transfer of Value

1.1 Recipients

Any HCP or HCO/PCO as applicable, in each case, whose primary practice, principal professional address or place of incorporation is in Europe.

1.2 Kind of ToVs

Donations and Grants This includes:

- Charitable contributions
- **Educational grants** (e.g., fellowships, courses provided by an HCO where KalVista does not select the individual HCPs participating)
- Sponsoring of speakers/faculty which by nature of purpose and funding are classified under educational grants

Event Sponsorship Placement of a brand logo in a conference program or invitation communication in exchange for supporting the program

- Funding an event in return for An exhibition stand
- Funding an event in exchange for advertising space
- Satellite symposia at a congress
- Any other activity qualified as “Corporate Sponsorship”
- Sponsoring of speaker/faculty and sponsoring courses provided by an HCO which are qualified as “Corporate Sponsorship”

Event Registration Fees Registration fees paid for the HCP/HCO to attend events

Event Travel and Accommodation

Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking, shared ground transportation).

Accommodation

Contracted Services - Fees received in consideration for consultancy services and/or ToVs resulting from or related to a contract between KalVista UK Ltd and institutions, organisations or associations of HCPs under which such institutions, organisations or associations provide any type of services to KalVista Ltd. This includes:

- Speaker engagements
- Advisory Boards
- Study-related engagements
- Medical writing
- Data analysis
- Development of education materials
- General consulting / advising
- Speaker training if linked to a speaker engagement

Contracted Services -Expenses

Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking)

2. Disclosure’s Scope

2.1 Products concerned

KalVista current has one licensed POM, Ekterly® (Sebetralstat) for treatment of acute attacks in patients aged 12 years and over, with Hereditary Angiodoema (HAE)

2.2 Company Concerned

KalVista Pharmaceuticals Ltd

2.3 Excluded ToVs

The following are not included as ToVs for the purposes of disclosure:

- Hospitality costs, i.e. subsistence provided to health professionals (meals and drinks), unless an integral and inseparable part of the cost of an event, e.g. sponsorship of a third-party HCO event.
- Items for HCPs/ORDMS or HCOs and patient educational materials
- Logistical costs related to KalVista UK Ltd. organised meetings/events
- ToVs to Patient Organisations are to be reported separately on KalVista UK Ltd.’s website

2.4 ToVs to date

Period covered January 1st – December 31st 2025

2.5 Direct ToVs

These fees include sponsorship for congresses, speaker fees and consultation and grants.

2.6 Indirect ToVs

Not applicable in this time period

2.7 Non-monetary ToVs

KalVista UK Limited made no non-monetary transfers in 2025..

2.8 ToVs in case of partial attendances or cancellations and refunds

Not applicable in this time period

2.9 Cross Border Activities

KalVista UK Limited made no cross border payments or transfers of earning.

2.10 R&D

No payments were made for R&D purposes during this time period.

2.11 Voluntary disclosure

Not applicable in this time period

3. Specific considerations

3.1 Country unique identifier

No commercial HCP/HCO identifiers are available to KalVista currently

3.2. Self-incorporated identifier

KalVista UK applies the same rules to HCPs with their own limited company and will disclose details in accordance with code of practice.

3.3. Multi-Year Agreements

KalVista UK Limited has no multi-year contracts in place.

KalVista UK Limited has no joint working agreements in place.

3.4 Country specificities

For the year 2025 no collaborative working with other pharmaceutical companies have been undertaken by KalVista UK.

3.5 Quality checks

KalVista is new to this process and as such no internal quality checks have been performed on this submission.

4. Data protection legal basis

4.1 Consent collection

Consent for the publication of the ToVs was obtained and documented as such before disclosing the data on an individual HCP/HCO level where applicable. Consent management procedures were conducted in alignment with the UK Data Protection Act 2018 and EU General Data Protection Regulation.

Consent was obtained either on Recipient level for all ToVs during a given period of time not shorter than one full year or on spend level for each interaction or single ToVs.

In case consent was either not given by the Recipient or not documented sufficiently to prove the existence of consent, ToVs are disclosed on aggregate level only.

4.2 Legitimate interests

All recipients of ToV have been individually contacted with intent to publish and have given email consent for names to be disclosed.

When processing is based upon legitimate interest, KalVista applies the standard legitimate interest balancing test. Please note that KalVista relies solely on its legitimate interest for Processing related to Transparency collection and reporting when such collection and reporting are not required by applicable law. In addition, many of our HCPs/Key Opinion Leaders are subject to contracts with KalVista for their services, thus our legal bases related to transparency vary between: Required by Law (GDPR Art 6(1)(c)), Processing necessary in performance of a contract (GDPR Art 6(1)(b)), and, only when the other two are not applicable do we rely on KalVista's legitimate interests (GDPR Art 6(1)(f)).

Legitimate Interest Balance Test:

- First, each processing activity must have a specific and lawful purpose. In the case of transparency monitoring, KalVista collects and maintains transfers of value to HCPs and HCOs to ensure that all transfers of value are at Fair Market Value according to industry guidelines, applicable law/guidance, and KalVista policies; that there is no undue influence through inappropriate or abundant transfers; and that KalVista is adhering to our internal policies and procedures, which are guided by applicable law.
- Second, each processing is analyzed to determine if the activity is necessary to achieve the purpose. Again, with transparency reporting, unless we collect this data, we cannot ensure that all transfers are compliant.
- Third, we review each processing activity in light of the rights, freedoms, and the reasonable expectations of the individuals. KalVista aims to collect only the data it needs to complete this processing activity, respecting the rights and freedoms of the individuals. Furthermore, given that transparency collection and reporting are standard across the industry, and that KalVista clearly states our processing for this purpose in both our online privacy notice and our HCP Privacy Notice (provided to HCPs with which KalVista maintains a relationship), it is very reasonable that all HCPs have an understanding and expectation that this processing is occurring

5. Form of disclosure

5.1 Date of publication

06/03/2026

5.2 Disclosure platform

Disclosure UK www.disclosureuk.org.uk

5.3 Disclosure language

English

6. Disclosure financial data**6.1 Currency**

All disclosed values are in Pound Sterling (GBP).

6.2 VAT included or excluded

All financial values are exclusive of VAT. Where a payment was fulfilled in another currency the value was converted into GBP based on the exchange rate at the time of payment.

6.3 Calculation rules

Not applicable since only direct ToVs in 2025 apply