



## Daiichi Sankyo UK Limited Methodology Note for the Disclosure of Transfers of Value

### Reporting Year: 2024

This note describes the methods used by Daiichi Sankyo UK Ltd (DSUK) to meet its obligations and the requirements for disclosing payments and Transfers of Value (ToV) to Health Care Professionals (HCPs), Other Relevant Decision Makers (ORDMs) and Healthcare Organisations (HCOs) as outlined in The European Federation of Pharmaceutical Industries and Associations (EFPIA) HCP/HCO Disclosure Code and further reflected in the Association of the British Pharmaceutical Industry (ABPI) Code of Practice.

The ToVs disclosed in this report cover payments made in 2024 by DSUK to HCPs, ORDMs and HCOs whose principal place of practice is the UK, in relation to activities and events.

All ToVs have been disclosed on the date payment was made to the beneficiary rather than the date the service was rendered or an event took place.

The UK, disclosures of ToV made by DSUK during the calendar year 2024 will be available on [www.disclosureuk.org.uk](http://www.disclosureuk.org.uk) from the last working day of June 2025.

#### Methodology and Definitions

Term	Methodology/Definition
<b>Collaborative Working</b>	The Collaborative Working Executive Summaries can be found on the following web-link. <a href="https://www.daiichi-sankyo.co.uk/about-us/who-we-are/collaborative-and-joint-working/">https://www.daiichi-sankyo.co.uk/about-us/who-we-are/collaborative-and-joint-working/</a>
<b>Co-Marketing projects</b>	Where DSUK jointly markets a product with another pharmaceutical company, DSUK will only declare those ToV made directly from Daiichi Sankyo bank accounts and listed in the company records as part of its normal business operations or by third parties engaged by Daiichi Sankyo to act on its behalf. ToV made by its co-marketing partners will be disclosed separately by those organisations.
<b>Cross Border Engagements and Payments</b>	All UK based HCPs, ORDMs, and HCOs that have received reportable ToV as a result of interactions with any Daiichi Sankyo entity will have the resulting ToV reported in the UK. All disclosures are made in the country in which the HCP / ORDM primarily practices, or in which the HCO has its legal domicile.
<b>Currency</b>	Where payments were made in a currency other than pound sterling (GBP), the exchange rate will vary according to the date on which the conversion calculation was made.
<b>Data Privacy</b>	DSUK has undertaken a legitimate interest assessment where we have balanced individual rights against our legitimate interests in complying with

	<p>the transparency obligations to which we are subject under the Code and the benefits obtained by the pharmaceutical industry and the wider public more generally.</p> <p>As we rely on legitimate interests, DSUK does not need HCPs or ORDMS consent to disclose personal data to Disclosure UK on an individual basis. However, HCPs or ORDMS have the right to make an objection request to DSUK's disclosure of personal data in this manner, we shall seek to ensure a balance is struck between the individuals rights and freedoms and our legitimate interests. We will cease processing their data in this way unless we can demonstrate compelling and legitimate grounds for the processing that override the interests, rights, and freedoms of the data subject or for the establishment, exercise, or defense of legal claims.</p>
<b>Donations &amp; Grants (D&amp;G)</b>	<ul style="list-style-type: none"> <li>• Donations include the provision of service, benefits-in-kind and physical items to support healthcare, scientific research or education paid to a healthcare, medical or scientific association upon receipt of an unsolicited request.</li> <li>• Grants are the provision of funds to support healthcare, scientific research or education paid to a healthcare, medical or scientific association upon receipt of an unsolicited request.</li> <li>• <b>Please NOTE:</b> The majority of DSUK Donations, Grants, and Collaborative Working expenditure for 2024 have been invested as part of a national contractual partnership with NHS England.</li> <li>• The programme involves supporting healthcare organisations (HCOs) undertake medicine-agnostic population health initiatives in Atrial Fibrillation related stroke prevention.</li> </ul> <p>The programme runs from 1 January 2022 until March 2024.</p>
<b>Healthcare Organisation (HCO)</b>	<p>Is either a healthcare, medical or scientific association or organisation 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 health professionals or other relevant decision makers provide services.</p>
<b>Health professional (HCP)</b>	<p>Includes any member of the 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. In relation to the annual disclosure of transfers of value (Clause 28), the term also includes any employee of a pharmaceutical company whose primary occupation is that of a practicing health professional.</p>
<b>Milestone Payments</b>	<p>Where contracts are valid for more than one year, and subject to milestone payments, the ToV is captured and disclosed in the year where payment against the achieved milestone(s) was made.</p>
<b>Partial/Non-attendance of HCPs and ORDMS at events</b>	<p>In the event of non-attendance at a Daiichi Sankyo organised meeting.</p> <ul style="list-style-type: none"> <li>• Travel or accommodation on behalf of a HCP/ORDM to attend a Daiichi organised meeting, when the HCP/ORDM is unable to attend the meeting will not be reported.</li> <li>• In the event of partial or non-attendance at third-party events/congresses.</li> <li>• Pre-paid registration fees to attend a third-party meeting and the HCP/ORDM is unable to attend, are not be reported.</li> </ul>

	<ul style="list-style-type: none"> <li>• Cancellation fees are not reported.</li> <li>• HCP/ORDM partially attending an event any ToV is disclosed.</li> </ul>
<b>Private Companies</b>	The payment or benefit received by a private company – which may be a HCP or a legal entity owned by a HCP (which is then a HCO) – will be disclosed as a ToV made to the HCP, especially in the case where the limited company is owned by a sole HCP.
<b>Other relevant decision maker (ORDM)</b>	<p>Mainly includes someone 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 is not a health professional.</p> <p>Any individuals who are academic doctors will be classified for the purposes of ToV as an ORDM</p>
<b>Research and Development Transfers of Value</b>	<p>‘Research and Development Transfers of Value’ means, for the purposes of disclosure, ToV to health professionals or healthcare organisation related to the planning or conduct of:</p> <ol style="list-style-type: none"> <li>I. Non-clinical studies (as defined in the OECD Principles on Good Laboratory Practice)</li> <li>II. Clinical trials (as defined in Regulation 536/2014)</li> <li>III. 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, health professionals specifically for the study.</li> </ol> <p>Daiichi Sankyo will include ToVs related to Daiichi Sankyo sponsored studies as well as non-Daiichi Sankyo-sponsored studies in the R&amp;D category.</p>
<b>Value Added Tax (VAT)</b>	Treatment of VAT depends on the TOV. Where DSUK has not claimed the VAT back, the gross figure i.e. including the VAT will be disclosed. Where DSUK has claimed the VAT back, we disclose the net value, i.e., excluding the VAT.