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# Daiichi Sankyo UK (DSUK): Methodological Note for HCP/ORDM/HCO Disclosure 2025

**Country location of the reporting entity: UK**

**Data year: 2025**

**Year of publication: 2026**

## **Summary Introduction**

This Methodological Note details Daiichi Sankyo UK's approach to disclosing Transfers of Value (ToVs) to Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs), and Healthcare Organisations (HCOs) for 2025, in line with the UK ABPI Code and EFPIA requirements. It explains the scope, definitions, data collection, and reporting methods used.

Payments to Patient Organisations, Members of the Public, Journalists, and similar recipients are reported separately with their own methodological notes.

DSUK is committed to transparency and compliance in all disclosures published.

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# 1 Definitions

## 1.1 Recipients

For this Methodological Note, Recipients are the Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs), and Healthcare Organisations (HCOs) to whom Daiichi Sankyo Group companies provide Transfers of Value (ToV) that fall under applicable disclosure requirements.

### 1.1.1 Healthcare Professional (HCP)

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 a Medicinal Product and whose primary practice, principal professional address or place of incorporation is in the UK.

### 1.1.2 Other Relevant Decision Maker (ORDM)

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.

Any individuals who are academic doctors will be classified for the purposes of ToV as an ORDM.

### 1.1.3 Healthcare Organisation (HCO)

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 UK or an organisation through which one or more health professionals or other relevant decision makers provide services.

## 1.2 Kind of ToVs

### 1.2.1 Donations and Grants

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.

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.

This category includes Donations and Grants to HCOs, which are disclosed under a single category.

### **1.2.2 Sponsorship agreements with HCOs / Third Parties**

Contributions provided to HCOs or third-party organisers for scientific or educational events, where Daiichi Sankyo receives defined benefit in return, such as visibility, exhibition space or other agreed benefits, and where the HCO or the organising third party is the contractual counterpart.

### **1.2.3 Registration Fees**

Fees paid to enable UK HCP/ORDMs to attend congresses, or other educational or scientific meetings organised by EFPIA member companies or third parties.

### **1.2.4 Travel and accommodation**

Costs related to supporting HCPs to attend congresses or educational events, such as flights, trains, hotel accommodation or local transport, where these costs are not part of a fee-for-service or consultancy arrangement.

### **1.2.5 Fees for Service and Consultancy**

Remuneration paid to HCPs, ORDMs or HCOs for contracted services, such as participation in advisory boards, speaking engagements, consultancy, medical writing, data analysis or similar activities not covered by the other categories.

### **1.2.6 Related Expenses to Fees and Consultancy (Other Costs Related to Fees - Travel and accommodation)**

Travel, accommodation and other expenses directly linked to a fee-for-service or consultancy contract and reimbursed or paid in addition to the service fee.

### **1.2.7 Collaborative Working and Joint Working**

The Collaborative Working Executive Summaries can be found on the following web-link.

<https://www.daiichi-sankyo.co.uk/about-us/who-we-are/about-us/who-we-are/collaborative-and-joint-working/>

### **1.2.8 R&D**

Research and Development for the purposes of disclosure: refer to section 2.10.

## 2 Disclosure's Scope

### 2.1 Products concerned

Daiichi Sankyo UK discloses Transfers of Value related to prescription only medicines and other activities that fall within the scope of the ABPI Code of Practice. The disclosure does not distinguish per product but covers all in-scope interactions with HCP/ORDMs and HCOs captured under this framework.

### 2.2 Company concerned

This methodological note applies to Transfer of Value reporting by Daiichi Sankyo UK. 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.

### 2.3 Excluded ToVs

Wholesalers, distributors or retailers of medicinal products are not considered "Recipients" within the meaning of applicable codes. Transfer of Value related to meals are also not reported in accordance with the ABPI Code of Practice.

### 2.4 ToVs date

Disclosures cover a full calendar year from January 1 to December 31 2025. Direct ToVs are reported based on the payment date. Indirect ToVs are reported based on the event start date.

### 2.5 Direct ToVs

Direct Transfers of Value are relevant payments made directly by any Daiichi Sankyo Group company to an in-scope Recipient.

### 2.6 Indirect ToVs

Indirect Transfers of Value are payments made by Daiichi Sankyo Group companies for the benefit of a Recipient towards a Third Party. Daiichi Sankyo can identify the Recipient that will benefit from the Transfer of Value.

These indirect ToVs typically include, but are not limited to, travel costs, accommodation costs, and/or registration fees paid to travel agencies or professional organisers.

## 2.7 Non-monetary ToVs

Non-monetary benefits provided to Recipients are captured within the relevant ABPI disclosure categories. We calculate the benefit, for example, by estimating usage duration and costs, adjusting for licenses and utilisation, then dividing total cost by effective usage to determine a per-user value.

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

When a HCO or HCP/ORDM is contracted to attend an event but does not show, e.g. due to illness or if the event is cancelled for other reasons, there are associated costs, for example, accommodation and travel bookings. These costs are treated as internal operational costs and are not reported. In case of partial attendance, only benefits received are reported.

## 2.9 Cross-border activities

ToV is reported in the country with the Recipient's primary business address. 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.

## 2.10 R&D

Research & Development ToVs are disclosed as a single aggregate amount, covering non-clinical studies (OECD GLP), Phase I-IV clinical trials (EU Directive 2001/20/EC) and non-interventional studies.

## 2.11 Voluntary disclosure

We report according to ABPI guidelines.

# 3 Specific considerations

## 3.1 Country unique identifier

Daiichi Sankyo uses a unique identifier, called OneKey ID, provided by IQVIA, for HCP/ORDMs and HCOs to ensure accurate Recipient identification. *Where this is not available, the recipient's place of work address is reported.*

## 3.2 Self-incorporated HCP

The payment or benefit received by a private company, which may be a HCP or a legal entity owned by an 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.

### 3.3 Multi-year agreements

ToVs from multi-year agreements are disclosed in the reporting period in which they are paid, the date of transaction.

### 3.4 Country specificities

UK Variation [As per PMCPA guidance] - Where DSUK jointly markets or collaborates 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 or collaborating partners will be disclosed separately by those organisations.

UK Variation [As per PMCPA guidance] – Link to all disclosures can be found by our UK website <https://www.daiichi-sankyo.co.uk/about-us/who-we-are/about-us/who-we-are/>

### 3.5 Quality Checks

Daiichi Sankyo uses a reporting software tool to collate, manage and remediate data. The data quality controls include, but are not limited to, categorisation checks and checks for duplicate data uploads. In addition to software use, there is a manual process in which the ToV Governance team reviews the collated data and conducts manual reviews and testing, including sample checks with the business.

## 4 Data protection legal basis

### 4.1 Consent collection

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.

### 4.2 Legitimate interests

DSUK has undertaken a legitimate interest assessment, balancing individual rights against our legitimate interests in complying with. The transparency obligations to which we are subject under the Code and the benefits obtained by the pharmaceutical industry and the wider public.

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 individual's rights and freedoms and our legitimate interests. We will cease processing their data (and add to aggregate) 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 defence of legal claims.

## 5 Form of disclosure

### 5.1 Date of publication

Daiichi Sankyo UK publication date is in accordance with ABPI requirements: the 30<sup>th</sup> of June 2026 for the previous year's data (2025).

### 5.2 Disclosure platform

Daiichi Sankyo UK discloses HCP/ORDM and HCO, and R&D aggregated data on: <https://www.abpi.org.uk/reputation/disclosure-uk/> Patient Organisations, and aggregated Members of Public, including Patients and Journalists, are published on the Daiichi Sankyo public website: <https://www.daiichi-sankyo.co.uk/>

### 5.3 Disclosure language

The disclosure language for Daiichi Sankyo UK's report is English.

## 6 Disclosure of financial data

### 6.1 Currency

Daiichi Sankyo UK discloses ToV in pound sterling (GBP).

Where payments were made in a currency other than the pound sterling GBP. Exchange rates provided by the Accounting Department are applied for cross-border ToV consolidation including R&D amounts.

## 6.2 VAT included or excluded

This report compiled by Daiichi Sankyo UK excludes value added tax (VAT) and lists net values.

## 6.3 Calculation rules

ToV values are summarised per reporting category, so the result is one single line per HCP/ORDM Recipient.

For HCOs, ToV, one line is reported for each transaction made to the HCO.

Values for the ToV category “Research & Development” are aggregated to one total sum.