

DISCLOSURES OF TRANSFERS OF VALUE: SUMMARY OF METHODOLOGY

1. ASTELLAS'S COMMITMENT

- 1.1 Astellas is a member company of the European Federation of Pharmaceutical Industries and Associations ("EFPIA"). The EFPIA Disclosure Code 2014 (the "EFPIA Disclosure Code" requires all member companies to document and disclose certain Transfers of Value they make, directly or indirectly, to or for the benefit of, Healthcare Professional ("HCPs") or Healthcare Organisations ("HCOs") ("Disclosures"). The EFPIA Code is implemented in the UK by the Association of the British Pharmaceutical Industry (ABPI) Code of Practice.
- 1.2 Astellas discloses all Transfers of Value to HCPs ORDMs and HCOs in accordance with its commitment to the EFPIA Disclosure Code and the ABPI Code of Practice.
- 1.3 This note summarises the methodologies used by Astellas in preparing Disclosures in compliance with the EFPIA Disclosure Code and the ABPI Code of Practice.

2. DEFINITIONS

- 2.1 The ABPI Disclosure Code defines the following terms:

- **Healthcare Organisation (HCO):** A healthcare, medical or scientific association or organisation (e.g., 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 HCPs or ORDMs provide services. This can also include a personal services company (see section 4.7).
- **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 Europe.
- **Other relevant decision makers (ORDM):** 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.
- **"Transfer of Value (ToV)":** Direct and indirect transfers of value (in payments or kind, or otherwise made) in connection with the development or sale of prescription-only medicinal products for human use whether for promotional services or otherwise.
- **"Research and Development (R&D)":** HCO/HCP transfers of value that relate to the planning and conduct of:

- Non-clinical studies (as defined in OECD Principles on Good Laboratory Practice).
 - Clinical trials (as defined in Directive 2001/20/EC).
 - 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, HCPs specifically for the study. This also includes investigator sponsored research (ISRs).
 - Non-interventional studies that are retrospective in nature have also been included within aggregate disclosure for R&D in this reporting year.
- 2.2 In the case of differences between the EFPIA reporting template and the Association of the British Pharmaceutical Industry (ABPI) Code of Practice for categorisation of transfers of value, the methodology below reflects the ABPI terminology used within the standard ABPI template.

3. DATA PRIVACY

- 3.1 Astellas fully supports the principles of transparency and abides by data privacy law.
- 3.2 For 2022 disclosure, Astellas has determined that legitimate interest is the most appropriate ground for disclosing individual transfers of value. A clause is included in every engagement contract notifying individuals that the legal basis for disclosure is now legitimate interest.
- 3.3 Where individuals exercise their rights under data privacy law to object to individual disclosure, a balancing test is conducted to assess whether there are compelling grounds for publishing the data on disclosure UK that override the interests or the fundamental rights and freedoms of the objecting individual. Where the outcome of the balancing test is in favour of the individual, those ToVs are reported in aggregate form.
- 3.4 Where the outcome of the balancing test is in favour of the individual data will be removed or amended from the publication on the Company's webpage/regulatory platform and/or our database or other platforms as soon as reasonably practicable.
- 3.5 Disclosures must remain in the public domain for a minimum of three years and Astellas will document all Disclosures and retain the records for at least seven years.

4. TRANSFERS OF VALUE

- 4.1 Astellas discloses the following Transfers of Value it makes to **HCOs**:
- **Donations:** Benefits in kind provided to HCOs for specified use.
 - **Grants:** Funding provided to HCOs in response to a request to support a specific activity that provides educational benefit or enhances patient care.
 - **Congress and educational event sponsorship:** Expenses related to the sponsorship of HCOs as congress organisers and/or secretariats in exchange for corporate benefits at an event (e.g., booth space, hosting of a symposium, stands, advertising on programmes or banners and room hire or catering if paid on behalf

of an HCO). This may also include activities such as preceptorships, where expenses are paid to HCOs for arrangement of educational events.

- **Fees:** Transfers of Value that are fees for service resulting from or related to contracts between companies and institutions, organisations or associations of Healthcare Professionals under which such institutions, organisations or associations provide any type of services to a company or any other type of funding not covered in the previous categories. Expenses relating to Fees will be disclosed separately as ‘Expenses agreed in the contracted services fee’.
- **Collaborative Working:** Funding provided (or benefits in kind) as part of a project with an HCO aimed at enhancing patient care or is for the benefit of patients or alternatively benefits the NHS and, as a minimum, maintains patient care providing it is carried out in a manner compatible with the Code.

4.2 Astellas discloses the following Transfers of Value it makes to **HCPs & ORDMs**:

- **Travel:** Expenses related to the provision of travel to HCPs or ORDMs in relation to a fee for service contract (e.g., rail travel, taxi travel, flights, reimbursement of private car miles) or to their attendance at an educational event.

Where travel expenses are required for the provision of a fee for service, these will be disclosed in the category of ‘contracted services expenses agreed in the fee for service’. Where there is no provision of services and they relate to contribution costs of an educational event they will be disclosed in the category of ‘Contribution to costs of events, Travel and accommodation’.

- **Accommodation:** Expenses related to the provision of overnight accommodation of HCPs or ORDMs in relation to a fee for service contract or to their attendance at an educational event. Where they are required for the provision of a fee for service, these will be disclosed in the category of ‘Contracted services expenses agreed in the fee for service’. Where there is no provision of services and they relate to contribution costs of an educational event they will be disclosed in the category of ‘Contribution to costs of events, Travel and accommodation’.
- **Meals and refreshments:** Directly reimbursed expenses related to the provision of meals and refreshments to HCPs or ORDMs in relation to their fee for service are disclosed in the category of ‘Contracted services related expenses’.
- **Fees:** Transfers of Value paid to Healthcare Professionals to provide services to Astellas. These may include advisory board services, speaker services or other consulting services. Fees and Transfers of Value relating to expenses agreed in the written agreement covering the activity will be disclosed as two separate amounts, under the ‘Fees’ and ‘Expenses’ agreed in the contracted services category.

4.3 In respect of each Transfer of Value described above, Astellas will disclose details only if an HCP/HCO/ORDM actually receives the benefit of the transfer. For example, Astellas will not disclose a transfer relating to a flight intended to be taken by a HCP in relation to a fee for service contract if the HCP does not in fact take the flight, even if a cost is incurred by Astellas. On the other hand, Astellas will disclose a Transfer of

Value if the HCP incurred the cost of the flight, he/she was going to take and was directly reimbursed by Astellas.

- 4.4 Astellas discloses Transfers of Value to HCPs and HCOs that relate to **research and development** in the aggregate figure.
- 4.5 Where Astellas makes a Transfer of Value to a HCP indirectly via a HCO, it discloses such transfer only once.
- 4.6 Where services for Astellas are rendered by a HCP on behalf of a HCO (for example, Astellas enters into a service contract with a HCO and the services are provided by the HCO's employee), the associated fees and expenses paid by Astellas to the HCO are disclosed as Transfers of Value made to the HCO. This is the case unless Astellas can confirm that the HCP received a benefit from the Transfer of Value, either directly from Astellas or via the HCO, (e.g., fees paid to the HCP in connection with the services he/she rendered and/or reimbursement of any related expenses the HCP incurred), in which case Astellas discloses those Transfers of Value as being transfers to the HCP. Where Astellas can identify the HCP and know that the HCO will make the full Transfer of Value to the HCP on Astellas' behalf, the Transfer of Value is disclosed as being a Transfer of Value to the HCP, except as provided in clause 4.7.
- 4.7 Where services are provided by a personal service company set up by a HCP or ORDM and the HCP or ORDM is not the sole director of the company, Astellas will consider the recipient as an HCO and disclose the Transfer of Value to the HCO.
- 4.8 Where services are provided by a 3rd party provider on behalf of several HCPs/HCOs (e.g., to provide national/regional educational meetings) and the recipient HCPs/HCOs cannot be individually identified, Astellas will disclose against the 3rd party provider.

5. COUNTRY OF DISCLOSURE

- 5.1 Astellas discloses Transfers of Value based on the HCP/HCO/ORDM's principal place of practice. If the HCP/HCO/ORDM operates in more than one country, Astellas will select one country to be the principal place of practice and disclose Transfers of Value in that country.
- 5.2 All Transfer of Value made by Astellas to UK HCOs/HCPs/ORDMs, irrespective of where the Astellas entity is located (e.g., transfers of value made by Astellas entities outside of the UK) are included in the UK Disclosure report.

6. CURRENCY

- 6.1 Astellas discloses Transfers of Value to UK HCPs, HCOs and ORDMS in GBP. Where Transfers of Value are made in a currency other than GBP the amount will be converted into GBP using an annual exchange rate. Amounts disclosed in GBP may therefore vary slightly from the exact amount paid in the local currency.

7. TIMING

- 7.1 Astellas discloses all Transfers of Value it makes between 1 January and 31 December of one year by 30th June of the following year. A Transfer of Value is made when the transfer is complete (e.g., on payment date or transfer of value date). For example, if a contract is signed on 1 October 2021 but the payment is made on 1 January 2022, the Disclosure will be published by the end of June 2023.

8. MULTI-YEAR CONTRACTS

- 8.1 Where a contract for any Transfer of Value listed in Section 4, runs for more than one year, Astellas will disclose Transfers of Value relating to that contract in the year the Transfer of Value was made (which may be different to the year in which the contract was agreed).

9. AMOUNT

- 9.1 Where possible, Astellas discloses the full amount of all Transfers of Value exclusive of VAT. In some instances, for indirect transfers of value, VAT may not be separable, in these cases, VAT has been included in the disclosure amount.
- 9.2 Transfers of Value to HCPs or ORDMs reflect fair market value, taking into account the nature of services rendered, the amount of time spent, and the knowledge and expertise of the HCP.
- 9.3 Collaborative Working in the form of non-financial support such as editorial support for a publication, agency support or other types of non-financial support. Where the donation consists of services or time (instead of a financial payment direct to the HCO) Astellas ascribes a monetary value to the service as follows:
- 9.3.1 Where the service is provided to a recipient via a third party, Astellas discloses the amount the third-party invoices Astellas for the service or goods as reflecting the value of the transfer.
- 9.3.2 Where the service is provided by Astellas personnel, Astellas discloses the value of the transfer as the amount the recipient would have paid for an independent service provider to render the same service. Astellas takes into account the nature and duration and other relevant factors relating to the services its personnel provided to the recipient and estimates what the recipient would have paid a third party for the same services. Astellas categorises and discloses these Transfers of Value as donation.
- 9.4 When Astellas is party to a co-promotion agreement, Astellas discloses only Transfers of Value made by Astellas, except where the other contracting party is a HCP or HCO, in which case Astellas is responsible for disclosing all Transfers of Value in connection with the agreement.