Daiichi Sankyo (DSND) Methodology for Disclosure of Transfer of Value

Contents

I. GENERAL

1. Cross Border Payments

All Transfer of Value (ToV) disclosures are made in the country in which the HCP practices or in which the HCO is located.

2. Currency

Where payments were made in a currency other than local currency, the exchange rate will vary according to the date on which the conversion calculation was made. For general purposes, the conversion date should be regarded as the average monthly exchange rate when the event took place.

3. Added value tax

All values provided in our report are net values, i.e. do not include value added tax.

4. Co-marketing projects

Where Daiichi Sankyo jointly markets a product with another pharmaceutical company, Daiichi Sankyo will only declare those ToV transactions made directly from Daiichi Sankyo bank accounts or by agencies working on behalf of Daiichi Sankyo, and listed in the company records as part of its normal business operations. Transfers of value made by its comarketing partners will be disclosed separately by those organizations.

5. Reporting date

Daiichi Sankyo will disclose ToV based on the date the transfer of value to HCPs/HCOs is actually made. This may mean that some projects taking place at the end of the calendar year will be disclosed as part of the next annual reporting period because the payment may not occur until January when the invoice has been received and settled.

6. Intermediaries

6.1 Intermediaries acting on behalf of Daiichi Sankyo

All intermediary (third parties) that represent or act on behalf of Daiichi Sankyo, are subject to written contract and are obliged to provide Daiichi Sankyo with any ToV made to a HCP or HCO. If this information cannot be provided due to the nature of the contribution (e.g. market research), it is in intermediaries responsibility to disclose the contributions where appropriate.

6.2 Intermediaries acting on behalf of HCO/HCP

Where the intermediary is a professional conference organizer (PCO) working on behalf of an HCO/HCP, Daiichi Sankyo declares the Transfers of Value in the in the name of the HCO/HCP.

6.3 Private companies and associated charities

The payment received by the contracting entity – which may be a HCP, a legal entity owned by a HCP (which is then a HCO) or a HCO – will be disclosed as a Transfer of Value made to that entity.

II. DATA PRIVACY

1. Informed consent and legitimate interest

DSND discloses ToV for HCPs made on a named basis (including any honorarium, expenses or registration fee) on the legal basis of legitimate interest.

For ToV made prior to January 2023, Daiichi Sankyo obtained permission from individual HCPs prior to disclosing personal data such as individual transfers of value. Daiichi Sankyo made every effort to secure and retain a record of the necessary permissions. Where permission was not obtained or where the individual HCP has refused permission, Daiichi Sankyo has declared the total ToV as an aggregate figure within the relevant disclosure category.

2. Partial consent

For ToV made prior to January 2023, where only partial permissions has been granted to disclose transfer of value by an HCP, the entire transfer of value to this particular HCP is disclosed in the aggregate category.

Starting January 2023, DSND implemented legitimate interest, therefore partial consent is not sought after this period. The individuals have the right to object, which will be dealt with on a case by case basis.

III. REPORTING CATEGORIES

According to EFPIA Guidance and country local disclosure code, travel and accommodation expenses related to advisory boards and other consulting meetings are published under “Fee for service and consultancy”

IV. RESEARCH AND DEVELOPMENT

1. Definition

Transfers of Value to HCPs or HCOs related to the planning or conduct of (i) nonclinical studies (as defined in OECD Principles on Good Laboratory Practice); (ii) clinical trials (as defined in Directive 2001/20/EC); or (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, HCPs specifically for the study.

2. Composition of R&D transfer of value

The aggregate R&D transfer of value includes:

- Contribution to costs of Investigator Meetings and Committees

- Investigator fees for patient visits (paid directly to clinical trial site staff or to CROs as an intermediary). Delayed payments by CROs to clinical trial site staff are not considered

The aggregate R&D transfer of value does not include fees paid to Clinical Research Organizations (CROs)