

Transparency Reporting at Kyowa Kirin AB Methodological Note for 2025 data

1. Introduction

Kyowa Kirin AB is committed to supporting healthcare and the development of patient care in Estonia.

We do this through the provision of financial and non-financial support to Healthcare Organizations (HCOs), Patient Organizations (POs), or Healthcare Professionals (HCPs). We also engage and pay HCOs, POs and HCPs for services that contribute to the improvement of patient care.

Provision of support and payments for services are referred to as 'Transfers of Value' (ToVs). In accordance with APME Code of Conduct, Kyowa Kirin AB publishes annually details of ToVs to these individuals and organizations.

2. Definition

2.1 Recipients

Healthcare Organizations (HCOs): Any healthcare, medical or scientific association or organization such as a hospital, foundation, university or other teaching institution or learned society (except for those who qualify as a Patient Organizations) through which one or more HCPs provide services.

Patient Organizations (POs): Not for profit organization (including the umbrella organizations to which they belong) mainly composed of patients and /or caregivers that represent and /or support the needs of patients and /or caregivers.

Healthcare Professionals (HCPs): Any individual or entity that is a member of medical, dental, pharmacy or nursing professions or any other person who, in the course of his or her professional activities, may prescribe, purchase, supply, recommend or administer a medicinal product.

For the avoidance of doubt, the definition of HCP includes: (i) any official or employee of a government agency or other organization (whether in the public or private sector) that may prescribe, purchase, supply, recommend or administer medicinal products and (ii) any employee of a Member Company whose primary occupation is that of a practicing HCP, but excludes (a) all other employees of a Member Company and (b) a wholesaler or distributor of medicinal products.

Retired HCPs - some HCPs continue to provide advice to the healthcare community after they have retired. Generally, Kyowa Kirin AB includes such HCPs in the applicable regulation's definition of an HCP, however this depends on their role and ability to prescribe and influence.

2.2 Kind of ToVs

This disclosure includes the following ToVs:

EFPIA* Category	EFPIA sub-category	Examples
Donations and grants	N/A	<ul style="list-style-type: none"> • Donations to HCOs or POs • Educational grants • Investigator- Sponsored Studies
Contribution to cost of events	Sponsorship agreements	Sponsorship of scientific events organized by HCOs or POs or third-parties on their behalf
	Registration fees	Financial support to HCPs or POs to attend scientific events
	Travel and accommodation	HCPs' or PO representatives travel and accommodation costs for attending scientific events
Fees for service and consultancy	Fees	Fees for: i) Chairing or attending Advisory Boards; ii) Speaking engagements; iii) Medical writing; iv) Consultancy
	Related expenses	Travel and accommodation expenses relating to the activities above
Financial support	N/A	In-kind donations to POs
Research and Development	N/A	Activities relating to: i) the planning or conduct of non-clinical studies; ii) clinical trials, iii) non-interventional studies that are prospective in nature; iv) clinical investigators' meetings

* European Federation of Pharmaceutical Industries & Associations

If activities relate to retrospective non-interventional studies, related ToVs are included in Fees for Service, rather than Research and Development.

Furthermore, Kyowa Kirin AB in Estonia discloses the list of patient organizations to which it grants financial support and/or significant support that is indirect/in kind or from which it receives contractual services in line with APME Code of Conduct.

3. Disclosure's Scope

3.1 Products concerned

Prescribed Only Medicines

3.2 Company concerned

Each Kyowa Kirin affiliate, in countries where the EFPIA code is applicable, is accountable for capturing and validating ToV data in their nation, and one disclosure is made per nation.

3.3 Excluded ToVs

This disclosure excludes the following ToVs:

- Hospitality costs (e.g. meals and drinks) unless these are an integral and inseparable part of contributions to the cost of events
- Informational and educational materials and items of medical utility, in line with article 9 of the EFPIA HCP/HCO Disclosure Code
- Logistical costs related to KKI-organized meetings (e.g. room hire)
- Medical Samples governed by Article 19 in the EFPIA Code of Practice.
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As the APME Code of Conduct only relates to ToVs to HCPs, HCOs and POs, this disclosure does not include:

- Donations to non-HCOs

3.4 ToVs Date

This disclosure covers ToVs between 1st January 2025 to 31st December 2025 to HCPs and HCOs which are registered in Estonia.

3.5 Direct ToVs

For direct ToVs, the recipient is considered to be the person or entity holding the bank account receiving the money.

3.6 Indirect ToVs

Kyowa Kirin AB also provides indirect ToVs. Payments that are made through Clinical Research Organizations are included under Research and Development and aggregated. Where a third party has been appointed by an HCO to manage an event, and where the HCO benefits from the ToV, the ToV is disclosed against the HCO. Where third parties are appointed by Kyowa Kirin AB to make travel and accommodation arrangements for HCPs, the ToVs are reported against the HCP who received the benefit. In order to avoid duplication of disclosing the data in cases where payments to healthcare professionals are made through a healthcare organization, the data is disclosed under the name of the healthcare professional (not the healthcare organisation).

3.7 Non-monetary ToVs

Any provision of goods, services, or other benefits without direct cash payment but that have a monetary value and must be disclosed under transparency or compliance regulations.

3.8 ToVs in case of partial attendances or cancellation and refund

Costs arising from the cancellation of collaboration (e.g., an HCP cancels their participation in a training event or congress) are not subject to disclosure, as the recipient does not receive financial benefit despite the costs.

3.9 Cross-border activities

KKI makes best efforts to capture and report all ToVs to HCPs, POs and HCOs with primary practice in a country with EFPIA Disclosure Code or other transparency reporting requirements. The country of disclosure is based on the HCP's country of principal practice or the HCO's or PO's country of registration.

3.10 R&D

ToVs of R&D include fees and expenses (e.g., travel and accommodation) provided to a healthcare professional (HCP) or healthcare organization (HCO) for the provision of services related to R&D related activities (pre-clinical studies, clinical trials or non-interventional studies).

Research and development payments, including costs related to events clearly connected with such activities, are disclosed on an aggregate basis. According to the term generally applied, payments related to research and development made to healthcare professionals and healthcare organizations or on their behalf are payments related to the planning or implementation of the following activities: (i) non-clinical trials (according to the definition given in OECD Principles on Good Laboratory Practice); (ii) clinical trials (according to the definition given in EU Regulation 536/2014); and (iii) non-interventional studies that are prospective in nature and during which data about patients are collected from healthcare professional(s) or on his/her/their behalf for the implementation of the study.

3.11 Voluntary disclosure

N/A

4. Specific considerations

4.1 Country unique identifier

N/A

4.2 Self-incorporated HCP (depending on the local legislation, qualified as individual or company)

Data is disclosed under the name of the healthcare professional.

4.3 Multi-year agreements

For multi-year agreements, disclosures are made based on the date each payment is executed, regardless of the overall contract duration.

4.4 Country specificities

N/A

4.5 Quality Checks (optional for pre-disclosure)

Kyowa Kirin AB conducts a quality review of completed Disclosable ToVs during the Report Generation process, including completeness and accuracy checks.

5. Data protection legal basis

5.1 Consent collection

In Estonia, ToVs to HCOs and POs are reported without the need for consent from these HCOs, as they are legal entities.
HCPs' ToVs are processed based on consent.

Typically, HCPs' consent is collected at the time of contracting. If consent is not provided, the ToV is included in an aggregate amount that encompasses all ToVs for all HCPs who have not provided consent. If an HCP has not indicated whether he/she consents to the public disclosure of ToVs, lack of consent is assumed and ToV data is also reported in the aggregate.

5.2 Legitimate interest

N/A

6. Form of disclosure

6.1 Date of publication

01 June 2026

6.2 Disclosure platform

The disclosure report for Estonia is published on Kyowa Kirin's homepage for the Nordic and Baltic countries (Kyowa Kirin AB) [Responsibility | Kyowa Kirin](#). Data will remain published for 3 years and stored for a minimum of 5 years by Kyowa Kirin AB. Updates of published data are conducted when necessary to allow for reflection of data updates or consent withdrawal after disclosure submission.

6.3 Disclosure language

The reports are published in Estonian language.

7. Disclosure financial data

7.1 Currency (local or if not, specify the exchange rate)

The currency used for disclosure is Euro. In the case that payments are made in a currency other than Euro the payment amount is converted to Euro using the daily exchange rate between the two currencies on the day of payment.

7.2 VAT included or excluded

All ToVs include VAT where applicable. Transfers of value to an individual (natural person) are reported as gross amounts.

7.3 Calculation rules (e.g., in-kind ToVs)

The date of the ToVs included in this disclosure is the date of payment (where the ToV is a payment); if the ToV is a benefit in kind, it is based on the date the recipient received the benefit.

8. Additional information

Any questions regarding this disclosure should be directed to infose@kyowakirin.com.