



## Transparency Reporting at Kyowa Kirin Methodological Note for 2022 disclosure of Transfers of Value

### 1. Introduction

Kyowa Kirin Ltd and Kyowa Kirin International are committed to always act in accordance with the principles as defined by The Association of [The British Pharmaceutical Industry](#) (ABPI) [Code of Practice](#) and [The Irish Pharmaceutical Healthcare Association](#) (IPHA) [Code of Practice](#).

- We are committed to benefiting **PATIENTS** and ensuring patient safety by operating in a professional, ethical, and transparent manner to ensure the appropriate and rational use of medicines and to support the provision of high quality healthcare. All interactions with patients and other stakeholders must comply with all applicable laws and regulations.
- We act with **INTEGRITY** and commit to engaging in relationships which are responsible, professional, ethical, and transparent. We ensure that all our communications are appropriate, accurate, factual, fair, balanced, up-to-date, not misleading, capable of substantiation and reflect the available evidence, and that all other activities are appropriate and reasonable and of the highest standards.
- We are committed to ensuring that **TRANSPARENCY** is respected. We are open about our activities and interactions with all stakeholders and encourage our stakeholders to act with the same openness.
- We interact with all our stakeholders with **RESPECT**. We are committed to approach our stakeholders in an open and constructive manner and with mutual respect. <sup>1</sup>

With regards to **TRANSPARENCY** Kyowa Kirin Ltd and Kyowa Kirin International are committed to supporting healthcare and improvements in patient care across the UK and Ireland. We are pleased to do this through providing appropriate funds to Healthcare Organisations (HCOs) engaging Healthcare Practitioners (HCPs) that contribute to the improvement of patient care. In accordance with ABPI & IPHA Code requirements, Kyowa Kirin Ltd and Kyowa Kirin International publish details about transfers of value to these individuals and organisations on an annual basis.

Each Kyowa Kirin affiliate in Europe is accountable for capturing and validating data in their nation and we make one disclosure per market. This disclosure covers transfers of value between 1<sup>st</sup> January 2022 to 31<sup>st</sup> December 2022 to HCPs and HCOs that are registered in the UK and Ireland.

## 2. Scope of disclosure

This disclosure includes the following transfers of value:

EFPIA Category	EFPIA sub-category	Example activities (not exhaustive)
Donations and grants	N/A	<ul style="list-style-type: none"> <li>• Donations to HCOs</li> <li>• Educational grants</li> <li>• Investigation Sponsored Studies</li> </ul>
Contribution to cost of events	Sponsorship agreements	<ul style="list-style-type: none"> <li>• Sponsorship of appropriate educational congresses organised by HCOs or third-parties on their behalf</li> </ul>
	Registration fees	<ul style="list-style-type: none"> <li>• Funding of HCPs to attend congresses</li> </ul>
	Travel and accommodation	<ul style="list-style-type: none"> <li>• HCP's travel and accommodation costs for attending congresses</li> </ul>
	Subsistence	<ul style="list-style-type: none"> <li>• Cost of subsistence in certain situations</li> </ul>
Fees for service	Fees	Fees for: <ul style="list-style-type: none"> <li>• Chairing or attending Advisory Board</li> <li>• Speaking engagements</li> <li>• Medical writing</li> </ul>
	Related expenses	Travel and accommodation expenses relating to the activities above
Research and Development	N/A	Activities relating to: <ul style="list-style-type: none"> <li>• planning or conduct of clinical studies</li> <li>• clinical trials</li> <li>• non-interventional studies that are prospective in nature</li> <li>• clinical investigator meetings</li> </ul>



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

This disclosure excludes the following transfers of value:

- Logistical costs related to KKI-organised meetings (e.g., room hire)

Transfers of Value to HCPs and HCOs as defined in the table above is disclosed on the company website in a format provided by the ABPI (UK) and IPHA (Ireland). Payments to Patient Organisations and contracted services to members of the public (including patients and journalists) are also disclosed on the company website but using a different report.

Some HCPs continue to provide advice to the healthcare community after they have retired. Generally, KKI include such HCPs in the applicable regulation's definition of an HCP.

### **3. Date of Transfers of Value**

The date of the transfers of value included in this disclosure is based on date of payment (where the transfer of value is a payment).

If the transfer of value is a benefit in kind, it is based on the date the recipient received the benefit.

### **4. Direct and Indirect Transfers of Value**

For direct transfers of value, the recipient is the person or entity holding the bank account receiving the money and beneficiary of the transfer of value.

Kyowa Kirin Ltd and Kyowa Kirin International also include indirect transfers of value.

In the case of payments that are made through Clinical Research Organisations, these are included under Research and Development and reported in an aggregated form.

Where a third party has been appointed by an HCO to manage an event, and where the HCO benefits from the transfer of value, these transfers of value are disclosed against the HCO.

Where third parties are appointed by KKI to make travel and accommodation arrangements for HCPs, the transfers of value are reported against the HCP who received the benefit.



## 5. Cross-border activities

KKI make best efforts to capture and report all transfers of value to HCPs and HCOs with primary practice in a country where The European Federation of Pharmaceutical Industries and Associations (EFPIA) [Disclosure Code](#) or other transparency reporting requirements. The country of disclosure is based on the HCP's principal practice or the HCO's country of registration.

## 6. Privacy and Disclosure

We strictly comply with all requirements arising from applicable data protection legislation for the disclosure to be lawful. Data protection legislation in the UK and Ireland is not applicable to HCOs, as they are considered legal entities. Instead, data protection legislation applies to HCPs and provides for certain requirements in order for the disclosure to be lawful.

To this end, we always inform HCPs about the disclosure through the Privacy Notice that is in principle included in the agreement signed between them and Kyowa Kirin regarding the Services of the former, as set out in Section 2 of this Statement, to KKI.

Furthermore, we have identified an applicable legal basis for transfers of value in 2022, that is Kyowa Kirin's Legitimate Interests pursuant to the UK and EU GDPR. Under this legal basis, our legitimate business needs to comply with ABPI's and IPHA's Codes of practice and at the same time to be able to promote trust and transparency towards its most precious collaborators, HCPs, comprise our legitimate interests and hence the basis in law for the disclosure. In practice, this means that the company does not ask for consent/permission to publish the information with the value received on the Company [website](#).

However, the Company still has a responsibility to allow HCPs the opportunity to raise objections using the email address: [kki\\_compliance\\_northerncluster@kyowakirin.com](mailto:kki_compliance_northerncluster@kyowakirin.com). Where an objection is raised, and a reasonable rationale is provided, then the Transfer of Value may be disclosed in an aggregated manner if considered appropriate.



## 7. Disclosure

Our report for payments made in 2022 is published at <https://international.kyowakirin.com/uk/transparency/> in English.

The currency used for disclosure is Sterling GBP in the UK and Euros in Ireland.

In the case that payments are made in a currency other than where the payment will be reported the payment amount is converted to the reporting currency using the daily exchange rate between the two currencies on the day of payment.

All Transfers of Value include VAT where applicable.

Any questions regarding this disclosure should be directed to David Eves, Compliance Director [kki\\_compliance\\_northerncluster@kyowakirin.com](mailto:kki_compliance_northerncluster@kyowakirin.com).

We welcome opportunities to ensure our commitment to transparency is provided with clarity and is most easily accessible. We welcome feedback to ensure to make any improvements.

1. [ABPI Principles](#)