



## Transparency Reporting at Kyowa Kirin International Methodological Note for 2025 data

### 1. Introduction

Kyowa Kirin International and Kyowa Kirin Ltd is committed to supporting healthcare and the development of patient care across the UK and Ireland.

We may do this through the provision of financial and non-financial support to Healthcare Organisations (HCOs), Patient Organisations (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 The ABPI and IPHA Codes of Practice, Kyowa Kirin Ltd publishes annually details of ToVs to these individuals and organisations.

### 2. Definition

#### 2.1 Recipients

**Healthcare Organisations (HCOs):** Any healthcare, medical or scientific association or organisation such as a hospital, foundation, university or other teaching institution or learned society (except for those who qualify as a Patient Organisations) through which one or more HCPs provide services. This also includes home care services where contracted by Kyowa Kirin Ltd.

**Patient Organisations (POs):** Not for profit organisation (including the umbrella organisations 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 organisation (whether in the public or private sector ) that may prescribe, purchase, supply 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.

**Other Relevant Decision Maker (ORDM):** Term intended to include persons who have a legitimate role in healthcare management and delivery but who are not themselves HCPs. This includes any person who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply, or use of any medicine. This may include, but is not limited to, administrators responsible for the management of medicines, public servants working on health policy and /or individuals working in the allied professions (e .g. physiotherapists, community health workers ).

**Retired HCPs** - some HCPs continue to provide advice to the healthcare community after they have retired. KKI include such HCPs in the applicable regulation's definition of an HCP

**Deceased HCPs** – if KKI is aware of the situation then it will exclude such HCPs in the applicable regulation's definition of an HCP for that year prior to report. Payments made in previous reports remain included

## 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"> <li>• Donations to HCOs</li> <li>• Educational grants</li> <li>• Investigator- Sponsored Studies</li> </ul>
Contribution to cost of events	Sponsorship agreements	Sponsorship of congresses organised by HCOs or third-parties on their behalf
	Registration fees	Financial support to HCPs to attend congresses
	Travel and accommodation	HCPs' travel and accommodation costs for attending congresses
	Subsistence	Cost of subsistence provided during a third-party educational event. This is reported against the HCO rather than HCP
Fees for service	Fees	Fees for: i) Chairing or attending Advisory Boards; ii) Speaking engagements; iii) Medical writing
	Related expenses	Travel and accommodation expenses relating to the activities above
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.

### **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:

- 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-organised meetings (e.g. room hire)

As the ABPI and IPHA Codes only relates to ToVs to HCPs and HCOs, this disclosure does not include:

- Donations to non-HCOs
- Support provided to Patient Organisations; this is disclosed in a separate report

#### **3.4 ToVs Date**

This disclosure covers ToVs between 1<sup>st</sup> January 2025 to 31<sup>st</sup> December 2025] to HCPs and HCOs which are registered in UK and Ireland

#### **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 Ltd and Kyowa Kirin International also provides indirect ToVs. Payments that are made through Clinical Research Organisations 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 KKI to make travel and accommodation arrangements for HCPs, the ToVs are reported against the HCP who received the benefit.

#### **3.7 Non-monetary ToVs**

Non-monetary ToVs may include benefits without monetary value.

#### **3.8 ToVs in case of partial attendances or cancellation and refund**

These are disclosed on a case by case basis

#### **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**

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

### **3.11 Voluntary disclosure**

Kyowa Kirin Ltd and Kyowa Kirin International meet the requirements as defined in the ABPI and IPHA Codes of Practice

## **4. Specific considerations**

### **4.1 Country unique identifier**

Kyowa Kirin contract an external provider to manage its customer relationship management system which provides a HCP unique identifier. Kyowa Kirin disclose using legitimate interest as its legal basis so do not publish the unique identifier

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

ToVs to self-incorporated HCP are reported against an HCP if sole trader or to a HCO

### **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**

Kyowa Kirin Ltd and Kyowa Kirin International meet the requirements as defined in the ABPI and IPHA Codes of Practice

### **4.5 Quality Checks (optional for pre-disclosure)**

Kyowa Kirin Ltd and Kyowa Kirin International 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 Legitimate interest**

Kyowa Kirin Ltd and Kyowa Kirin International use the legal basis of legitimate interest as this is the most transparent means to meet the core principles of disclosure

## 6. Form of disclosure

### 6.1 Date of publication

30/6/26

### 6.2 Disclosure platform

Responsibility | Kyowa Kirin

### 6.3 Disclosure language

English

## 7. Disclosure financial data

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

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

### 7.2 VAT included or exclude

All ToVs include VAT where applicable.

### 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 [kki\\_compliance\\_northerncluster@kyowakirin.com](mailto:kki_compliance_northerncluster@kyowakirin.com)