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# Daiichi Sankyo Europe GmbH: Methodological Note for HCP/ HCO/ PO Disclosure

Country location of the reporting entity: Germany

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# 1 Definitions

## 1.1 Recipients

For the purpose of this Methodological Note, Recipients are the Healthcare Professionals (HCPs), Healthcare Organizations (HCOs) and Patient Organizations (POs) to whom Daiichi Sankyo Group companies provide Transfers of Value (ToV) that fall under applicable disclosure requirements.

### 1.1.1 Healthcare Professional (HCP)

Any natural person that is 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.

This 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 an EFPIA Member Company whose primary occupation is that of a practicing HCP,  
but excludes all other employees of an EFPIA Member Company and a wholesaler or distributor of Medicinal Products.

### 1.1.2 Healthcare Organization (HCO)

Any legal person/entity

- (i) that is a healthcare, medical or scientific association or organization (irrespective of the legal or organizational form) such as a hospital, clinic, foundation, university or other teaching institution or learned society (except for patient organizations) whose business address, place of incorporation or primary place of operation is in Europe or
- (ii) through which one or more HCPs provide services.

### 1.1.3 Patient Organization (PO)

Non-for-profit legal person/entity (including the umbrella organization to which it belongs), mainly composed of patients and/or caregivers, that represents and/or supports the needs of patients and/or caregivers and which business address, place of incorporation or primary place of operation is in Europe.

## 1.2 Kind of ToVs

### 1.2.1 Donations and Grants

Funds, assets or services freely given for the purpose of supporting healthcare, scientific research or education, with no consequent obligation on the recipient to provide goods or services to the benefit of the donor in return.

This category includes Donations and Grants to HCOs and Patient Organizations, which are disclosed under a single category.

### 1.2.2 Sponsorship agreements with HCOs / Third Parties

Contributions provided to HCOs or third-party organizers for scientific or educational events, where Daiichi Sankyo receives defined services in return, such as visibility, exhibition space or other agreed benefits, and where the HCO or the organizing third party is the contractual counterpart.

### 1.2.3 Registration Fees

Fees paid to enable HCPs or PO representatives to attend congresses, or other educational or scientific meetings organized by EFPIA member companies or third parties.

### 1.2.4 Travel and accommodation

Costs related to supporting HCPs (or PO representatives where applicable) to attend congresses or educational events, such as flights, trains, hotel accommodation or local transport, where these costs are not part of a fee-for-service or consultancy arrangement.

### 1.2.5 Fees for Service and Consultancy

Remuneration paid to HCPs or HCOs for contracted services, such as participation in advisory boards, speaking engagements, consultancy, medical writing, data analysis or similar activities not covered by the other categories.

### 1.2.6 Related Expenses to Fees and Consultancy (Other Costs Related to Fees - Travel and accommodation)

Travel, accommodation and other expenses directly linked to a fee-for-service or consultancy contract and reimbursed or paid in addition to the service fee.

## 2 Disclosure's Scope

### 2.1 Products concerned

Daiichi Sankyo Europe discloses Transfers of Value related to prescription medicines and other activities that fall within the scope of the EFPIA Code of Practice and applicable local transparency requirements. The disclosure does not distinguish per product but covers all in-scope interactions with HCPs, HCOs and POs captured under this framework.

### 2.2 Company concerned

This methodological note applies to Transfer of Value reporting by Daiichi Sankyo Europe GmbH (DSE) for HCPs, HCOs and POs based in countries in scope of the EFPIA Code of Practice and where no established DSE Affiliate is present to fulfil the obligation for country reporting.

### 2.3 Excluded ToVs

Wholesalers, distributors or retailers of medicinal products are not considered "Recipients" within the meaning of applicable codes or laws. Transfer of Value related to meals are also not reported in accordance with the EFPIA Code of Practice.

### 2.4 ToVs date

Disclosures cover a full calendar year from January 1 to December 31. Direct ToVs are reported based on payment date. Indirect ToVs are reported based on the event start date.

### 2.5 Direct ToVs

Direct Transfers of Value are relevant payments made directly by any Daiichi Sankyo Group company to an in-scope Recipient.

### 2.6 Indirect ToVs

Indirect Transfers of Value are payments made by Daiichi Sankyo Group companies for the benefit of a Recipient towards a Third Party. Daiichi Sankyo can identify the Recipient that will benefit from the Transfer of Value.

These indirect ToVs typically include but are not limited to:

Travel costs, accommodation costs, and registration fees paid to travel agencies or professional conference organizers.

## 2.7 Non-monetary ToVs

Non-monetary benefits provided to Recipients are captured within the relevant EFPIA disclosure categories. For example, a group bus transfer from an airport to a conference venue falls in the category 'Travel Expenses'. The value is based on an estimate of the market value of the benefit.

## 2.8 ToVs in case of partial attendances or cancellation and refund

When an HCO, an HCP or a PO is contracted to attend an event but does not show e.g. due to illness or if the event is cancelled for other reasons, there are associated costs, for example accommodation and travel bookings. These costs are treated as internal operational costs and are not reported. In case of partial attendance, only benefits received are reported.

## 2.9 Cross-border activities

Our reporting software centralizes ToV data from regions outside Europe (e.g. USA and Japan) and for non-affiliate countries (e.g. Poland), ensuring appropriate allocation for country-level disclosure based on Recipient primary address. ToV is reported in the country with the primary business address of the Recipient.

## 2.10 R&D

Research & Development ToVs are disclosed as a single aggregate amount per country, covering non-clinical studies (OECD GLP), Phase I-IV clinical trials (EU Directive 2001/20/EC) and non-interventional studies (EFPIA Code article 18).

## 2.11 Voluntary disclosure

We report according to EFPIA guidelines and include patient organization reporting in the same report.

# 3 Specific considerations

## 3.1 Country unique identifier

Daiichi Sankyo Europe uses a unique identifier, called OneKey ID, provided by IQVIA, for HCPs, HCOs and POs to ensure accurate Recipient identification.

## 3.2 Self-incorporated HCP

Self-incorporated HCPs are reported as HCOs.

### **3.3 Multi-year agreements**

ToVs from multi-year agreements are disclosed in the reporting period they are paid and processed through SAP or uploaded to our reporting software.

### **3.4 Country specificities**

Please see individual country methodological notes for details.

### **3.5 Quality Checks**

Daiichi Sankyo works with a reporting software tool and performs remediation of data with it. The data quality controls include but are not limited to categorization checks, consent checks and duplication of data upload checks.

## **4 Data protection legal basis**

### **4.1 Consent collection**

Daiichi Sankyo Europe collects consent from ToV recipients for individual named disclosure where required. Consent is requested via contracts or pre-disclosure notifications and archived according to DSE procedures. Where consent is obtained, ToVs are disclosed individually; without consent, they are disclosed in aggregate.

Consent withdrawal: Affiliates ensure best efforts to publish on individual basis by obtaining valid data privacy consents. Consent status is tracked continuously.

Partial consent: the last consent/reject response determines the disclosure approach for all transactions in the reporting period. Partial consent or partial withdrawal are not allowed.

### **4.2 Legitimate interests**

Daiichi Sankyo Europe GmbH is located in Germany and applies the German data privacy rules for transparency disclosure.

In regard to the reporting of personal data this means: the interests of individuals in data protection outweigh the public interest in disclosure. Therefore, disclosing personal data remains voluntary and consent collection from the affected data subject is required.

## 5 Form of disclosure

### 5.1 Date of publication

Daiichi Sankyo Europe publication date is in accordance with EFPIA requirements: June 30 for the data of the previous year.

### 5.2 Disclosure platform

Daiichi Sankyo Europe publishes one consolidated report for EFPIA countries without Daiichi Sankyo legal entities and maintains an overview of country disclosure websites on the public DSE internet site.

### 5.3 Disclosure language

The disclosure language for the report of Daiichi Sankyo Europe GmbH is English.

## 6 Disclosure financial data

### 6.1 Currency

Daiichi Sankyo Europe uses one currency per reporting country, generally EUR. There are local currencies for country reports for example Swedish Crown and Swiss Franc. Exchange rates provided by DSE Accounting Department are applied for cross-border ToV consolidation including R&D amounts.

### 6.2 VAT included or excluded

This report compiled by Daiichi Sankyo Europe excludes value added tax (VAT) and lists net values.

### 6.3 Calculation rules

ToV values are summarized per reporting category, so the result is one single line per Recipient.

Multiple fee-for-service payments to the same Recipient for separate events which all occurred during the same year are summarized to one value under the category "Fee-for-service".

Values for the ToV category "Research & Development" are aggregated to one total sum.