

HCP/HCO/PO Methodological Note Template

Please do not rearrange or delete any of the headings and/or subheadings below.

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Country: Nordic CountriesFinland, Norway and Sweden

Daiichi Sankyo Nordics: Methodological note for HCP/HCO/PO disclosure

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Contents

1	Definitions	2
1.1	Recipients	2
1.2	Kind of ToVs	3
2	Disclosure's Scope	4
2.1	Products concerned	4
2.2	Company concerned	4
2.3	Excluded ToVs	4
2.4	ToVs date	5
2.5	Direct ToVs	5
2.6	Indirect ToVs	5
2.7	Non-monetary ToVs	5
2.8	ToVs in case of partial attendances or cancellation and refund	5
2.9	Cross-border activities	5
2.10	R&D	5
2.11	Voluntary disclosure	6

3	Specific considerations	6
3.1	Country unique identifier	6
3.2	Self-incorporated HCP	6
3.3	Multi-year agreements	6
3.4	Country specificities	6
3.5	Quality Checks	6
4	Data protection legal basis	6
4.1	Consent collection	6
4.2	Legitimate interests	6
5	Form of disclosure	7
5.1	Date of publication	7
5.2	Disclosure platform	7
5.3	Disclosure language	7
6	Disclosure financial data	7
6.1	Currency	7
6.2	VAT included or excluded	7
6.3	Calculation rules	7
7	Additional Information	7

1 Definitions

1.1 Recipients

Healthcare Professional (HCP)

Finland: HCP refers to the persons whose work envisages the prescription or dispensing of medicines. The professionals entitled to prescribe or dispense medicines include physicians, senior pharmacists and pharmacists.

OBS: Nurses are not HCPs.

Norway: HCPs means doctors, dentists, authorized nurses, pharmacists, as well students in the related subjects.

Sweden: HCPs means physicians, pharmacists, nurses or any other natural person within healthcare or a government agency who has a right to prescribe, purchase, supply,

recommend or administer a medicinal product, including employees of a pharmaceutical company whose primary occupation is that of practicing healthcare personnel.

Healthcare Organization (HCO)

Any legal person/entity (i) that is a healthcare, medical or scientific association or organisation (irrespective of the legal or organisational form) such as a hospital, clinic, foundation, university or other teaching institution or learned society.

Patient Organization (PO)

A Patient Organization is any organization working at the international, regional, national and / or local level to represent and support Patients, their families and caregivers.

1.2 Kind of ToVs

A Transfer of Value is a transfer of some form of value or benefit from Daiichi Sankyo Nordics to an HCP, an HCO or a PO related to (in the widest sense) the promotion of medicinal products for human use. A transfer of value can be made by Daiichi Sankyo Nordics directly or indirectly via an intermediary on behalf of Daiichi Sankyo Nordics and can be a monetary payment (such as a fee for service) or a non-monetary benefit (such as a flight or a registration fee where the money is paid to a travel agent or event organizer).

Donations and grants

Finland: Donations, grants and benefits in kind offered to institutions, organisations or associations are permitted, when they don't constitute an incentive for the recommendation, prescription, purchase, supply, sales or administration of a particular medicinal product.

Norway: Objects of value, service or pure financial contributions given by a Member Company without the recipient providing reciprocation.

Sweden: Donations are contributions given by pharmaceutical companies to healthcare organizations, strictly prohibited from funding internal, regular, or recreational activities. These donations are permissible only when designated for supporting research and development (R&D) efforts.

Congress / educational training

Fees to support the attendance of an individual HCP or PO Representative to an Event organized or created by a EFPIA Member Company and/or a Third Party.

Travel & Accommodation costs

The category of travel & accommodation costs refers to expenses related to supporting an HCP, i.e. to attend a congress or educational event. These costs are not related to a fee for service or consultancy.

Fees for services

Payments for services rendered by an HCP or an HCO based on a contract, i.e. advisory board, speaker presentation, consultancy or other services not covered by the previous disclosure categories.

Other fee related costs

Related expenses, i.e. travel & accommodation costs, agreed to in the fee for service or consultancy contract.

Other

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”.

2 Disclosure’s Scope

2.1 Products concerned

Daiichi Sankyo oncology products.

2.2 Company concerned

Daiichi Sankyo Nordics Aps.

2.3 Excluded ToVs

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.

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.

2.4 ToVs 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 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.

2.5 Direct ToVs

Direct ToV is made directly by DSND to the recipient of the benefit i.e. monetary payment. General rule to identify direct transfer is that the actual ToV recipient coincides with the SAP Vendor that received the monetary transfer.

2.6 Indirect ToVs

Indirect ToV generally include expenses such as travel, accommodation, and registration fees. They may also encompass honoraria paid to speakers or consultants, provided these payments were made through a Third-Party Vendor.

A key principle for identifying Indirect ToVs is that the ultimate beneficiary of the value is not the direct SAP Vendor who received the payment, but another individual or entity.

2.7 Non-monetary ToVs

A flight or a registration fee where the money is paid to a travel agent or event organizer.

2.8 ToVs in case of partial attendances or cancellation and refund

ToV will be disclosed for partial attendances and when the cancellation is without valid reason.

2.9 Cross-border activities

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

2.10 R&D

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.

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.

- For Denmark, the fee for service for the primary investigator.

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

2.11 Voluntary disclosure

N/A

3 Specific considerations

3.1 Country unique identifier

N/A

3.2 Self-incorporated HCP

N/A

3.3 Multi-year agreements

N/A

3.4 Country specificities

N/A

3.5 Quality Checks

N/A

4 Data protection legal basis

4.1 Consent collection

For ToV prior to January 2023, Daiichi Sankyo obtained individual HCP consent before disclosing personal data. Where consent was not obtained or refused, ToV was reported as an aggregate figure within the relevant category.

From January 2023 onward, Daiichi Sankyo Nordics applies legitimate interest. HCPs retain the right to object, which will be handled case by case.

4.2 Legitimate interests

DSND discloses Transfers of Value (ToV) to HCPs on a named basis (including honoraria, expenses, and registration fees) under the legal basis of legitimate interest.

5 Form of disclosure

5.1 Date of publication

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 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.

5.2 Disclosure platform

Daiichi Sankyo Nordics website: [Transparency | Daiichi Sankyo](#)

5.3 Disclosure language

English and local languages.

6 Disclosure financial data

6.1 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.

6.2 VAT included or excluded

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

6.3 Calculation rules

For general purposes, the conversion date should be regarded as the average monthly exchange rate when the event took place.

7 Additional Information

N/A