

Disclosure Methodology for Patient Organisations and the Public including Patients and Journalists

This methodological note is intended to help readers understand the disclosure of data regarding Transfers of Value (TOV) to Patient Organisations and Members of the Public in the UK made by Santen UK Limited (Santen). We have summarised below the methodologies used by Santen in preparing these disclosures and identifying support and services provided.

Santen UK uses a management tool (CRM) through which all support provided to Patient Organisations by Santen UK is recorded.

Using this tool, we capture and categorise all activity made in the UK, including the following details:

- The Patient Organisation who received the TOV
- Period covered by the TOV
- Type of support provided, for example, financial, non-financial, contracted services or a non-monetary benefit
- Value of the TOV
- Currency in which the TOV was made
- Date the TOV was made

The data collected in the CRM is used to prepare the disclosure for Patient Organisations on the Santen UK website.

Data is collected separately for engagements with the public.

Please find below some more information to support the understanding of our disclosure:

Written Agreements	Written agreements are in place for all projects and services with a Patient Organisation and for Contracted Services with Members of the Public.
'Donations', 'Grants' and 'Sponsorship'	Santen defines Donations and Grants as "one-way" TOVs: Donations have been classified as the provision of physical items, services or in-kind support and Grants as funding; in both cases the company would not expect to receive a service in return. Santen defines 'Contracted Services' and 'Sponsorship' as a "two-way" TOV: in return for the TOV Santen received a defined service, such as a consultancy or speaking engagement. There is an exception of the "two-way rule" for sponsorship to attend scientific congresses, for which there is no expected service in return.
Payments	Disclosure has been made based on the payment date of the TOV. Where the TOV is non-financial support, it will be disclosed based on the date it was provided.
VAT	Where VAT has been included in payments, the VAT is disclosed as part of the Transfer of Value.
Currency	TOVs are paid in sterling, but where TOVs are made in different currencies, these are converted to sterling at the prevailing exchange rate.
Cross-border payments	Where other Santen affiliates have engaged with UK Patient Organisations and/or Members of the Public, the data for these TOVs is collected separately and are included in our disclosure.
Non-monetary transfers of value	Disclosure of non-monetary transfers of value is made at the equivalent value in monetary terms.
Pre-Disclosure Quality Checks	All engagements were reviewed internally using the CRM, payments system and external data to ensure that all TOVs made in 2024 are included.