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Interactions between pharmaceutical companies and Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs), Healthcare Organisations (HCOs) and Patient Organisations (POs) contribute to scientific progress and improved patient care. Santen UK Limited is committed to ensuring that all such interactions meet the highest standards of ethics, integrity and transparency, in line with the EFPIA Code of Practice and the ABPI Code of Practice and applicable local legislation and industry standards.

In accordance with these requirements, Santen UK Limited identifies, collects, validates and discloses Transfers of Value (ToVs). This methodological note describes the methodologies, assumptions, data sources, systems, internal controls, categorisation rules and country-specific requirements applied by Santen UK Limited in preparing its annual disclosure reports under the ABPI frameworks.

This document is intended to support understanding of the disclosure of Transfers of Value made by Santen UK Limited to HCPs, ORDMs and HCOs in the United Kingdom during the calendar year 2025. It summarises the methodologies used by Santen to identify, capture and report each category of ToV.

Santen is a global pharmaceutical company focused on ophthalmology. The UK subsidiary was established at the end of 2014 and engages with the ophthalmology community through a range of activities, including consultancy services, advisory support, educational meetings and congresses. These interactions may involve Transfers of Value, such as speaker fees, sponsorship of HCP attendance, and support for meetings organised by HCOs. Transfers of Value made by other parts of the Santen group during 2025 that are reportable in the UK have been included within the UK disclosure.

Santen UK Limited is a member of the ABPI and adheres to both the letter and the spirit of the ABPI Code of Practice in all activities, including Transfers of Value during 2025.

Santen UK Limited uses a customer relationship management (CRM) system to record contacts and meetings with HCPs. Certain engagements conducted by Santen affiliates are captured outside this system. All Transfers of Value agreements reportable in the UK during 2025 have been

captured and categorised, including details of the recipient, period covered, type and value of the Transfer of Value, currency, date of payment, and the recipient's consent status.

The data collected are submitted to a third-party provider, which produces disclosure reports based on the country of residence of the HCP or HCO. Where an HCP has provided consent to disclose some Transfers of Value individually but consent is not given, missing or withdrawn for other Transfers of Value, all relevant Transfers of Value are disclosed in aggregate, in line with applicable requirements.

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1 Definitions

1.1 Recipients

- **Healthcare Professional (HCP):** As defined by EFPIA, any natural person practicing medicine, pharmacy, dentistry or nursing, or any other person who may prescribe, purchase, supply, recommend or administer a medicinal product. This includes hospital pharmacists and retired HCPs if ToVs relate to past engagements.
- **Healthcare Organisation (HCO):** Any legal person/entity providing healthcare, medical or scientific services, including hospitals, clinics, foundations, universities, learned societies, and professional associations.
- **Other Relevant Decision Maker (ORDM):** Defined under EFPIA as individuals who could influence the formulation of governmental or hospital policy, pricing, reimbursement, procurement, or access to medicines.
- **Patient Organisation (PO):** A non-profit legal entity/organisation recognised as representing the needs of patients and/or caregivers.
- **Third Parties:** A legal entity/person/individual acting on behalf of Santen (e.g., CROs, event agencies, market research companies).

1.2 Kind of ToVs

A Transfer of Value is any direct or indirect transfer of cash, in-kind support or other benefit provided to an HCP, ORDM, HCO or PO in connection with the development or sale of medicinal products for human use.

Donations and Grants: Santen provides Transfer of Value (ToV) as Grants or Donations to Recipients (not for profit HCOs and Patient Organisations) to support science, technology, medicine, healthcare, research, education, or the needs of patients/caregivers, educate the public/patients on disease states, medical conditions, science, or technology, further genuine purposes that are consistent with Santen's scientific and disease-state interests.

Contribution to Costs of Events: Santen provides ToVs to Recipients for educational support at medical/educational events or congress for travel and accommodation including the cost of flights, trains, parking fees, taxis, and hotel accommodation, etc. and the cost of registration fees for a Recipient to attend a medical / educational event or congress.

Sponsorship Agreements: Santen provides ToVs when sponsoring a Recipients event. Where a third-party company is a conference or event organiser acting on behalf of a Recipient Santen will make every effort to disclose ToVs against the beneficiary Recipient(s) even when the payment is made to the third-party company. Agreements are formalised in contracts and Memorandum of Understandings that describe the purpose of the sponsorship, the benefits Santen receive and the related ToVs. If the sponsorship includes registration fees, travel, and accommodation, these will be disclosed separately in the relevant categories in the name of the HCO/ PO, unless the recipient HCP is known to Santen whereby, we will disclose against the individual if we have the necessary consent.

Contracted Service/Fee for Service and Consultancy: Santen provides ToVs for services Santen receives from Recipients under service agreements such as Speaker fees and Consultancy. HCPs, HCOs and POs offer expert knowledge on patients' behaviour and management of diseases. This plays a major role in informing Santen's efforts to improve patient care and treatment options – which is essential to improving patient outcomes. We compensate HCPs, HCOs and POs for the valuable insights and time they offer in line with Fair Market Value.

Research and Development: transfers of value to HCPs or HCOs related to the planning or conduct of non-clinical studies, clinical trials and non-interventional studies. ToVs related to

Research and Development activities are disclosed under the “Research and Development” category in aggregate, based on the date of payment.

2 Disclosure’s Scope

2.1 Products concerned

Santen markets Prescription Only Medicines, Medical Devices and Over the Counter Medicines. The report does not include ToV solely related to over the counter medicines.

2.2 Company concerned

The methodology applies to transfers made by Santen UK Limited and its affiliates, including but not limited to: Santen SA, Santen Pharmaceutical Asia Pte. Ltd. The disclosure covers ToVs to HCPs, ORDMs, HCOs and POs whose main practice address or place of incorporation is in the United Kingdom. Transfers to recipients based outside these territories are disclosed according to the rules of the country of residence.

2.3 Excluded ToVs

Any subsistence provided to HCPs, ORDMs has been excluded.

2.4 ToVs date

Disclosure has been made based on the payment date of the ToV. This means that ToV for certain engagements may be disclosed in two different disclosure periods. For example, any deposits paid in 2025 for events in the next calendar year will appear in the 2025 disclosure, with the balance payable being disclosed in 2026. Where payments have been made by a third party for travel expenses on behalf of Santen, these are disclosed based on the date of travel.

2.5 Direct ToVs

Direct payments made by Santen will be disclosed based on the payment date of the ToV.

2.6 Indirect ToVs

For any indirect payments (e.g., conferences where accommodation and/or travel is booked, or registration fees are paid on behalf of Recipients) all relevant expenses are collected from our Third Party Suppliers. Where payments have been made by a third party for travel expenses on behalf of Santen, these are disclosed based on the date of travel.

2.7 Non-monetary ToVs

Disclosure of non-monetary Transfers of Value is made at the equivalent value in monetary terms.

2.8 ToVs in case of partial attendances or cancellation and refund

Expenditure has not been attributed to the named Recipient where travel arrangements were cancelled or unrecoverable due to circumstances beyond the intended recipient’s control where no ToV took place.

2.9 Cross-border activities

Other Santen affiliates engaged UK HCPs and HCOs and these ToVs are included in the report. Where Santen UK Limited engaged with a HCP from a country other than the UK this payment will be reported by the Santen affiliate in that country, in accordance with the legislation or industry code in the country of residence. The payments were made in the currency of the country of residence.

2.10 R&D

For the purpose of disclosure, 'Research and development Transfers of Value' means, Transfers of Value to HCPs or HCOs related to the planning or conduct of non-clinical studies (as defined in the OECD Principles of Good Laboratory Practice), clinical trials (as defined in Regulation 536/2014) and 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 health professionals specifically for the study.

2.11 Voluntary disclosure

N/A

3 Specific considerations

3.1 Country unique identifier

N/A

3.2 Self-incorporated HCP

Some HCPs create their own company or work through a company to provide advice and services to the pharmaceutical industry, these ToVs are disclosed against the individual HCP.

3.3 Multi-year agreements

Contracts are in place for all projects and services provided. Transfers of Value are disclosed according to the date of payment from Santen. Where a multi-year contract is in place, the ToV is disclosed based on the payment dates of the ToV.

3.4 Country specificities

Collaborative Working Agreements are disclosed based on the date of the Transfer of Value.

3.5 Quality Checks

ToVs are captured using the company's CRM systems, financial and payments systems, contract management tools, and data provided by third-party partners. All engagements are subject to internal review to ensure that all ToVs made in 2025 are included, that an appropriate disclosure agreement is in place, and that consent is accurately recorded against each relevant ToV. Where a separate disclosure agreement is not in place, the ToV is disclosed in aggregate. Affiliates report cross-border ToVs for inclusion in the recipient's country of residence.

Each ToV must be supported by appropriate documentation, including contracts, agreements, invoices, proof of service delivery, and payment records. Internal teams validate the accuracy and completeness of the dataset. Quality controls include systematic reconciliation between internal systems, confirmation that service agreements are approved prior to payment, validation of currency conversion accuracy, and a final pre-disclosure review.

4 Data protection legal basis

4.1 Consent collection

In line with the ABPI Code, disclosure of individual-level ToVs to HCPs requires explicit consent. Santen requests consent from all HCPs at the time of each specific ToV using separate disclosure agreements. HCPs may withdraw their consent for individual disclosure at any time. Where consent is not provided, is only partially provided, or is withdrawn, all ToVs made to that HCP during the relevant reporting period (calendar year) are disclosed in aggregate. Where consent is withdrawn after initial agreement, disclosure is updated and the relevant ToVs are retrospectively aggregated.

4.2 Legitimate interests

N/A

5 Form of disclosure

5.1 Date of publication

31/03/2026

5.2 Disclosure platform

Disclosure UK – <http://www.disclosureuk.org.uk/>

UK HCP/HCO ToVs are published via Disclosure UK. Support to patient organisations is published on the company website in ABPI frameworks. All disclosures follow the annual publication deadlines set by applicable rules.

5.3 Disclosure language

Report is published in English.

6 Disclosure financial data

6.1 Currency

GBP. The great majority of our ToVs were paid in GBP, but where ToVs were made in different currencies, these were converted to GBP at the prevailing exchange rate.

6.2 VAT included or excluded

VAT is not paid on fees to HCPs, except upon receipt of a VAT invoice, but is included in the payment of expenses. Where VAT has been included in payments to HCOs or HCPs, we have disclosed the VAT as part of the Transfer of Value.

We do not deduct any taxes from our TOVs, but we make it clear in our HCP contracts that taxes where applicable must be paid by the HCP..

6.3 Calculation rules

N/A

7 Additional Information

N/A