

Methodological Note for HCP/HCO/PO Disclosure Data Year 2025

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Introduction

Collaborative working between medical professionals and healthcare organisations has long been a positive driver for advancements in patient care and the development of innovative medicine. Medical professionals and the organisations with whom they work provide the pharmaceutical industry with valuable, independent and expert knowledge derived from their clinical and disease management experience. Furthermore, as the primary point of contact with patients, the medical professional can offer invaluable expert knowledge on patient outcomes and therapy management. This helps to adapt our products to better suit patients and thereby improve patient care overall.

Healthcare professionals and organisations should be fairly compensated for the services they provide to pharmaceutical companies. The European Federation of Pharmaceutical Industries and Association's (EPFIA) Code of Practice provides accuracy and transparency in disclosing the scope and value of such collaborative work, and it will become an important step towards building greater trust between the pharmaceutical industry, medical community and patients.

As a member company of Finnish EFPIA organisation Pharma Industry Finland and as a full corporate member of EFPIA, AstraZeneca ("AZ") is committed to transparency around interactions with Healthcare Professionals (HCPs), Healthcare Organisations (HCOs), and Patient Organisations (PO), and that these are captured and reported in line with all applicable local transparency requirements.

AZ's own policies are fully aligned with the aims of the EFPIA Code of Practice and its local interpretation in the Pharma Industry Finland Code of Ethics – to promote ethical and transparent interactions with the Healthcare community. Our interactions with HCPs/HCOs/POs are governed by the AZ Code of Ethics and supporting Global Standards, which require that we run every part of our business with integrity and refuse to give or receive anything of value that may be intended, or could be seen as, improper influence.

Producing transparency reporting is an opportunity for AZ to demonstrate its commitment to the values and principles behind the EFPIA Code of Practice and other transparency requirements in Europe.

The objective of this note is to explain AZ's approach to disclosure, to include key definitions, the scope of disclosed activities and key elements of the process followed to capture and report data.

At a high level, there are three main tenets that characterize the AZ approach:

(1) Affiliate accountability and regional consolidation

Affiliates are responsible for capturing the Transfers of Value (ToVs) made in their affiliates and for validating the accuracy of the data. A regional reporting solution consolidates the ToVs, providing consistency and automating inclusion of cross border payments within Europe. Other cross border payments are collected through a payment system (US) or manually (rest of world).

(2) Compliance with local codes

Unless there are strong legal mandatory requirements, affiliates have transposed the Code in full that is without deviations. In each country, AZ will comply with applicable local disclosure

requirements. There may be variations (stricter than the provision in the Code) or deviations (where because of mandatory national regulations the code cannot be transposed in full).

(3) One disclosure per market, including all ToVs paid directly through entities belonging to AZ or indirectly through third parties acting on behalf of AZ

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1 Definitions

1.1 Recipients

1.1.1 Definition of a Healthcare Professional (HCP)

Any natural person whose work envisages the prescription or dispensing of medicines. The professionals entitled to prescribe or dispense medicines include physicians, dentists, veterinarians, and pharmacists. Moreover, some nurses, opticians and dental hygienists have a limited right to prescribe certain medicines. In addition, all nurses and clinical nutritionists have been considered as HCPs in the report of ToVs.

Publication is determined by the recipient's status when the transfer of value was made, regardless of the later HCP status changes (retirement, job changes or passing away). Any ToV made within the calendar year must be included in the disclosure report for that year.

1.1.2 Definition of a Healthcare Organization (HCO)

Healthcare Organization (HCO): Any legal entity that is a healthcare, medical, or scientific association, society, or organization, and any company or corporation through which one or more HCPs provide services. Self-incorporated, single-person HCP entities are treated as HCOs for disclosure purposes. Healthcare Organisations include:

- healthcare, medical and scientific associations, societies and organisations as well as
- companies and other corporations through which one or several healthcare professionals provide their services

1.1.3 Definition of a Professional Congress Organiser (PCO)

A PCO is a company/individual specialised in the organisation and management of congresses, conferences, seminars and similar events (all "Events"). For the application of this Guidance, commercial companies involved in organisation of travel (travel agencies) or accommodation (hotels, banqueting functions in hotels, etc.) are not considered PCOs.

1.1.4 Definition of a Patient Organisation (PO)

Patient organisations are organisations of public utility, their local and regional associations and central organisations established and focusing on a certain condition, disease or disability or a group thereof. Their members are mainly patients and their caretaking family members, and they represent or promote the interests of the patients or their caretakers.

1.2 Kind of ToVs

1.2.1 Donations and Grants

AZ provides support for medical or scientific education, advances in medical or scientific research, health or healthcare systems or disaster relief through financial or non-financial ToVs to legitimate, established organisations.

AZ can provide this support through:

- Contributions or Sponsorships (or referred to as Grants) to support initiatives in HCP Education, including education about healthcare systems and practices, Medical or Scientific Research, or Partnerships.
- Donations to a non-profit or public sector healthcare organisation (HCO) intended to support their charitable mission and activities.
- Donations and Grants to Patient Organisation (PO)
- Donations and Grants as part of Community Investments to charities and other non-profit non-HCOs are subject to separate disclosure and thus excluded.

Donations to HCOs can be both monetary and donations in kind. Product Donations are given in circumstances of national emergency, international or national disaster relief or other genuine public health need. AZ charitable product donations and processes are aligned to the World Health Organisation (WHO) Guidelines for Drug Donations.

1.2.2 Sponsorship Agreements

AZ gives contributions, through financial or non-financial support to legitimate, established organisations for medical or scientific education of external stakeholders, organizing or hosting educational or scientific events (including independent congresses). These contributions aim to increase the scientific or educational quality of the event and/or support with logistics in modest venues or with incidental hospitality, in line with AZ's own ethical principles. The sponsorship is based on an approved budget for the education/scientific event. The mandatory Sponsorship Agreements will describe the purpose of the sponsorship.

Sponsorship packages may also include satellite symposia and the sponsoring of speakers or faculty.

ToVs are made to either the HCO directly or to an event organizer or other third party appointed by the HCO to manage the event. In all cases, ToVs are disclosed against the HCO that ultimately benefits.

Where contributions made to HCOs include support for travel & accommodation for HCPs to attend Independent Congresses and the HCPs benefitting from this support are unknown, this payment will be assigned to the EFPIA category "Sponsorship Agreements".

1.2.3 Registration Fees

As part of support to continuous medical education, AZ provides support to HCOs or HCPs to cover the costs of registration fees for HCPs to attend selected independent congresses and where provided to HCOs, also for other educational/scientific events.

Where these are provided to HCOs, AZ is not involved in the selection of the HCPs.

Where these are provided to individual HCPs, the purpose of the support is to enable delegates (max two per year):

- to attend presentations or participate in scientific exchange on significant developments related to AZ products or uses or related to AZ's scientific research; or,
- to support the performance of a contract for services.

All arrangements are generally paid directly to travel and/or accommodation providers or organiser.

1.2.4 Travel and Accommodation

As part of support to continuous medical education, AZ provides support to HCOs or HCPs to cover the costs for Travel and Accommodation for HCPs to attend selected independent congresses and/or AZ Organised Meetings and where provided to HCOs for other educational/scientific events.

These costs can include costs of flights, trains, hotel accommodation, taxis, bus transfers, and other travel costs.

Costs for ground transportation (for example bus or taxi) that are organised for group transportation and not assigned to certain HCPs are reported in aggregate, but where the identity of the HCPs is known, these are split by HCP.

1.2.5 Fees for Service and Consultancy and Related Expenses

AZ engages an HCP/HCO for services when there is a genuine and legitimate business need and where the HCP/HCO is qualified and appropriate to provide the services. These services are paid with a Fee for Service at Fair Market Value.

These services can include:

- Speaking at and chairing meetings
- Training services
- Participation at advisory board meetings
- Medical writing
- Data analysis
- Development of education materials
- General consulting/advising

- Services performed in connection with a third-party congress
- Retrospective Non-interventional studies
- Participation in market research where such participation involves remuneration and/or travel. Payments for these services are only disclosed if AZ is aware of the identity of those participating in the market research

As part of the written Fee for Services Agreement, related expenses can be paid for and can include costs of flights, trains, car hire, tolls, parking fees, taxis, bus transfers, hotel accommodation and any visa costs. All costs are paid by AZ to travel and or /accommodation providers or meeting organizers (where relevant) or reimbursed supported by appropriate receipts.

1.2.6 Research and Development

Research and development transfers of value' means, for the purposes of disclosure, transfers of value to health professionals or healthcare organisations 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 EU Regulation 536/2014)
- 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 Disclosure's Scope

2.1 Products concerned

AZ is a science-focused company, developing innovative medicines that are prescription only medicines and interactions with HCPs/HCOs/POs are focused on the development and promotion of prescription medicines. Consequently, only ToVs relating to prescription medicines are being disclosed.

2.2 Company concerned

The report covers the disclosure of transfers of value that are provided by AstraZeneca Oy, its affiliates and acquired or merged companies (if not disclosed under the acquired company name in a separate report) irrespective of their location, to HCPs or HCOs who practice or are registered in Finland.

2.3 Excluded ToVs

2.3.1 Informational and educational materials and items of medical utility

As per Art 17 of the EFPIA Code of Practice, items of medical utility for HCPs and informational and educational material are not disclosed where "The transmission of informational or educational materials is permitted, provided it is: (i) "inexpensive"; (ii) directly relevant to the practice of medicine or pharmacy; and (iii) directly beneficial to the care of patients."

2.3.2 Donations to charitable organisations

All ToVs to non-HCO organisations are out of scope and excluded for example charitable organisations.

2.3.3 Hospitality costs

As per Art 10 of the EFPIA Code of Practice, hospitality costs are not disclosable if in line with the limits set within the national association. AZ applies these limits for AZ Organised & Sponsored Meetings, and therefore costs of meals & drinks are excluded. However, where meals and drinks make up an integral and inseparable part of contributions to the cost of events or sponsoring as part of Sponsorship Agreements with HCOs, they have been included in Contributions to Cost of Events.

2.3.4 Logistical costs

Logistical costs related to AZ Organised Meetings (e.g. room hire, technics, personnel) are excluded. However, ToVs for speaker fee and related costs for their services such as travel and/or accommodation are included in the relevant cost category.

2.4 ToVs date

Where the ToV is a payment, values are reported on the date of the payment.

Where ToVs relate to multi-year contracts, only the ToVs made in the reporting year are included.

Where the ToV is a benefit in kind, values are reported on the date the recipient received the benefit.

2.5 Direct ToVs

The natural or legal person that holds the bank account on which the money is transferred is considered the recipient of the ToV and will be disclosed.

Direct ToVs are captured and flow into the AZ transparency reporting system. They are then mapped to the appropriate EFPIA disclosure activity category for reporting.

2.6 Indirect ToVs

2.6.1 Indirect ToVs through third parties for R&D activities

Where a third party providing services for R&D activities acts on behalf of AZ to make ToVs to HCPs/HCOs, these are within scope and are reported at an aggregate level under R&D (as long as their activities fall within the scope of the definition of R&D activities).

2.6.2 Indirect ToVs through PCOs

Contributions provided to Events through PCOs, that would therefore be the Recipient of the ToVs, must be considered as indirect ToVs. ToVs through PCOs are reported either in the name of benefitting HCO, or in the name of Recipient PCO if the HCO is unknown. This applies whether PCOs organise Events on their own initiative, or at the request of an HCO.

Contribution to costs related to Events paid through PCOs to the benefit of individual HCPs must be reported on an individually named basis, as Indirect ToVs to HCPs, or in the name of Recipient PCO if the HCP is unknown. Disclosures on an individual names basis are subject to appropriate consent; where such consent cannot be secured, related ToVs will be disclosed in aggregate.

2.6.3 Indirect ToVs through HCOs

Where ToVs are made to an individual HCP indirectly via an HCO and where AZ has obtained the consent, these will be disclosed against the HCP in line with local association guidelines.

2.6.4 Indirect ToVs through other third parties

Where third parties are appointed by an HCO to manage an event, and where the HCO ultimately benefits from that ToV, these ToVs are disclosed against the HCO. Where an event is organised on behalf of multiple HCOs without clarity on allocation, the value is divided equally between the HCOs.

Where third parties are appointed by AZ to make travel and accommodation arrangements for HCPs who are providing services or are supported to attend events, these ToVs are disclosed against the HCP.

Any additional administration fees charged by agencies are not included, as these are not ToVs to HCPs or HCOs.

2.7 Non-monetary ToVs

Where benefits-in-kind, such as services or labor, are provided to an HCO by AZ or third parties, the monetary value of these benefits is disclosed against the HCO recipient.

Where benefits in kind are services in the form of donations (e.g., therapy review service) provided by third parties appointed by AZ to HCOs for the purpose of supporting healthcare or research, the value of the completed service provided to a specific HCO is tracked and recorded against the recipient HCO.

2.8 ToVs in case of partial attendances or cancellation and refund

Where an HCP/HCO does not receive the benefit due to a no show or a cancellation of event, the associated costs are not reported, such as the cost of cancelling a hotel booking or accommodation. In case of partial attendance, only the benefits actually received are reported. Where AZ has to pay cancellation fees to HCP/HCOs as per service contracts, due to cancellation of initiatives or events, these payments are reported.

2.9 Cross-border activities

AZ makes their best efforts to capture and report all ToVs to HCPs and HCOs with their primary practice in a country with EFPIA Code of Practice and/or other cross border transparency reporting requirements. The country of disclosure will be determined by the address of principal practice for HCPs and the address of registration for an HCO.

Disclosures are made locally, either on each affiliate's website, or on a separate disclosure platform if prescribed by the national code or law.

2.10 R&D

All ToVs related to the planning or conduct of non-clinical studies, clinical trials and non-interventional studies performed by AZ or by Clinical Research Organisations on AZ's behalf that are prospective in nature are considered Research & Development ToVs and are reported on an aggregate basis.

Retrospective non-interventional studies or other studies that are not submitted to authorities as per local drug law do not fall under the category of R&D activities. The ToVs related to those studies will be reported as Fee for Service under name of the individual recipient.

2.11 Voluntary disclosure

Voluntary disclosure is not applicable.

3 Specific considerations

3.1 Country unique identifier

AZ provides one unique identifier for any HCP, HCO, or PO that is to be reported. This ID is generated by AZ and is used to ensure that transactions are reported against the correct recipient to facilitate collection of ToVs throughout Europe and across other affiliates.

3.2 Self-incorporated HCP

Where a self-employed HCP is incorporated in a legal entity that consists of only that one HCP, this is considered as an HCO, as it is a legal entity but remains subject to providing consent, as per data privacy recommendations.

If an HCP is "self-employed" but has not set up a legal entity, they are treated as an individual HCP.

3.3 Multi-year agreements

For agreements that extend over multiple years, AstraZeneca applies a split payment approach and the ToV is disclosed for the calendar year in which payment or reimbursement is processed in our financial systems.

Where ToVs relate to multi-year contracts, only the ToVs made in the reporting year are included. Where the ToV is a benefit in kind, values are reported on the date the recipient received the benefit.

3.4 Country specificities

Finland follows the national pharmaceutical industry association Lääketeollisuus ry (Pharma Industry Finland, PIF). EFPIA methodology and disclosures should be aligned with PIF's Code of Ethics and the transparency requirements for transfers of value reported in Finland.

3.5 Quality Checks

AstraZeneca aims to ensure that the data included in the publicly available disclosure reports is complete to the best of our knowledge. AstraZeneca keeps its disclosure data under review and

will amend and/or update its disclosure data if/when it becomes aware that its quality and accuracy could be improved.

AstraZeneca relies on a combination of automated systems, standardized processes, and manual data collection from internal and external resources to record and report relevant ToV data. The information reported is done in good faith and best efforts to comply with the requirements of the PIF and EFPIA Disclosure Code.

4 Data protection legal basis

4.1 Consent collection

4.1.1 HCO and PO consent

In Finland HCOs and POs are reported without the need for a consent as they are legal entities.

4.1.2 HCP consent

HCPs' data is reported based on legitimate interest. A "yes" response is assumed, but HCPs have the right to refuse to have their data disclosed. In such cases, the payments or transfers towards them are reported in aggregate.

4.1.3 Management of recipient consent withdrawal

Consent to disclose can be withdrawn at any time before and after public disclosure:

- If consent is withdrawn before disclosure the consent value is changed to "No"
- If consent is withdrawn after public disclosure, the published data is set offline and a revised report is uploaded that no longer shows the individual HCP ToV line but has integrated those ToVs in the aggregate line.

4.1.4 Partial consent

If consent is requested per engagement and the HCP provides partial consent, all transactions for that reporting year will be reported in aggregate.

4.2 Legitimate interests

Legitimate interest is used for the disclosure of 2025 payments.

5 Form of disclosure

5.1 Date of publication

The date of publication for Finland is 15th June 2026 in line with Pharma Industry Finland requirements.

5.2 Retention of data

AstraZeneca retains the relevant records of disclosures for at least 5 years. Published data remains accessible online for 3 years after publication.

5.3 Disclosure platform

For AstraZeneca Oy, a company incorporated in Finland, disclosure is made in <https://www.astrazeneca.fi/>. Disclosure is also made on AstraZeneca's external website under the Sustainability section at www.astrazeneca.com.

5.4 Pre-disclosure process

AstraZeneca operates a pre-disclosure process to allow recipients to review Transfers of Value (ToVs) prior to public disclosure on the AstraZeneca website.

- Healthcare Professionals (HCPs) are notified via pre-disclosure letters sent by e-mail or by paper letter via postal mail.
- Healthcare Organizations (HCOs) and Patient Organizations (POs) are notified via pre-disclosure paper letters sent by postal mail.

5.5 Disclosure language

Disclosure is made in Finnish.

6 Disclosure financial data

6.1 Currency

Disclosure will be made in euros. For in scope transactions requiring conversion, the calculation will be applied when the transaction is moved to the reporting environment, using the AZ Uniform

Reference Environment (AZURE) rates. AZURE is what AZ utilizes for conversion rates for each currency.

6.2 VAT included or excluded

ToVs to HCPs are reported with WHT taxes, but all ToVs relating to HCOs are reported without VAT.

6.3 Calculation rules

Payments from HCPs or HCOs to AstraZeneca (e.g. due to corrections of incorrect payments or repayments due to cancellations) are published as negative payments or deducted from the total amount.

7 Additional Information

7.1 Management of recipient's requests

Requests or disputes are managed in concertation with AZ global or other AZ marketing companies, if applicable. A central email address for requests is dedicated to HCPs/HCOs communication. AZ will follow minimum standard responses from corporate and commits to resolving and republishing if required.