

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

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Introduction

A focus on transparency at Alexion Pharma Spain, SLU.

Collaborative working between the pharmaceutical industry and healthcare professionals is legitimate and necessary for improving patients' life expectancy and quality of life through scientific progress, enabling us to access the most innovative treatments, as well as serving as a further channel for updating medical knowledge. Healthcare 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 inestimable value on therapeutic management and the results achieved. This helps us 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 EFPIA Code of Practice provides accuracy and transparency in disclosing the scope and value of such collaborative work, with a view to build trust between the pharmaceutical industry, healthcare professionals, patients and society at large.

Alexion is a subsidiary of AstraZeneca, a member company of Farmaindustria and a full corporate member of EFPIA. As such Alexion is committed to transparency around interactions with Healthcare Professionals (HCPs), Healthcare Organisations (HCOs), and Patient Organisations (POs) and that these are captured and reported in line with all applicable local transparency requirements.

Alexion's own policies are fully aligned with the aims of the EFPIA Code of Practice and its local interpretation in the "Code of Practice for the Pharmaceutical Industry" – to promote ethical and transparent interactions with the Healthcare community. Our interactions with HCPs/HCOs/POs are governed by the Alexion Code of Ethics and support 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 Alexion to demonstrate its commitment to the values and principles behind the EFPIA Code of Practice, Farmaindustria Code and any other transparency requirements in Europe.

The objective of this note is to explain Alexion's approach adopted to prepare these reports. It also defines certain key concepts and describes the scope of the activities covered, as well as the key elements of the data collection and publication process.

At a high level, there are three main tenets that characterize the Alexion 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, Alexion 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 Alexion or indirectly through third parties acting on behalf of Alexion

The legal entities included in reporting for Spain are:

- Alexion Pharma Spain, S.L.U.

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1 Definitions

1.1 Recipients

1.1.1 Definition of an HCP

Any member of the medical, dental, pharmaceutical, nursing or podiatric profession, any other person legally considered as such, or any other person who, in exercising their profession, may perform or participate in the prescription, purchase, supply, dispensation or administration of medicinal products for human use. For this report veterinarians are excluded from this concept.

Publication is determined by the recipient's status when the transfer was made, regardless of the subsequent changes in the healthcare professional's circumstances (retirement, job changes or death). Any ToV made within the calendar year must be reported for that year.

1.1.2 Definition of an HCO

Any legal body or entity (i) that is a medical or scientific organisation, healthcare institution (of any legal status or organisation), such as hospitals, clinics, foundations, universities and other academic entities, scientific societies (excluding Patient Organisations), or (ii) through which one or more Healthcare Professionals provide services.

1.1.3 Definition of a PO

A non-for-profit legal person/entity (including the umbrella organisation 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 Spain.

1.2 Kind of ToVs

1.2.1 Donations and Grants

Financial contributions which Alexion makes to public non-profit organizations declared of public utility. These Donations are covered in Article 16 of Law 49/2002. Some examples are:

- Grants for scientists, healthcare or educational projects.
- Organization of congresses (not only intended to pay hospitality expenses).
- Support with Workshops and training courses (not only intended to pay hospitality expenses).

Donations are only given for a particular purpose, justifying the scientific reason, the occasion of the event etc., for which the donation is made.

Alexion Spain does not donate lasting medical equipment for use in the treatment or diagnosis and / or medical equipment such as spirometers, stethoscopes and thermometers. The donations are considered to be an exceptional form of collaboration with the HCO.

1.2.2 Sponsorship Agreements

Financial contributions (not only intended for payment of hospitality expenses) for an activity, initiative or projects under the following conditions:

- Alexion name is associated with the activity (for example, through the logo).
- Alexion can get opportunities to improve their reputation.

Typical cases:

- Research or training scholarships.
- Awards.
- Conferences, courses.
- Websites.
- Books, manuals.

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" towards HCO or PCO appointed by HCO.

1.2.3 Other sponsorship agreements: Partnership agreements

Financial contributions (not only intended for payment of hospitality expenses) to Foundations and non-profit organizations declared of public utility, covered in Article 16 of Law 49/2002 for an activity or project or initiative where the following conditions apply:

The organization undertakes to disseminate by any means the Alexion´s collaboration within the activity (for example through materials including logo in the activity).

Alexion can receive opportunities to improve their reputation.

Typical cases include:

- Research or training scholarships.
- Awards.
- Conferences, courses.

1.2.4 Registration Fees

As part of support to continuous medical education, Alexion 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, Alexion 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 Alexion products or uses or related to Alexion'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.

1.2.5 Travel and Accommodation

As part of support to continuous medical education, Alexion provides support to HCOs or HCPs to cover the costs for Travel and Accommodation for HCPs to attend selected independent congresses and/or Alexion 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.

1.2.6 Fees for Service and Consultancy and Related Expenses

Alexion engages an HCP/HCO/PO for services when there is a genuine and legitimate business need and where the HCP/HCO/PO 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 in 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 Alexion 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 Alexion to travel and or /accommodation providers or meeting organizers (where relevant) or reimbursed supported by appropriate receipts.

1.2.7 Research and Development

For the purpose of disclosure Research and Development transfer of value is defined as transfer of value to health professionals or healthcare organisations related to planning or conduct of non-clinical studies, clinical trials and non-interventional studies performed by Alexion or by Clinical Research Organisations on Alexion's behalf.

1.2.8 Donations and contributions to charities and patient organisations

All Transfers of Value to Patient Organisations fall within the scope of this methodological note and are disclosed in accordance with the EFPIA Code of Practice and the Farmaindustria Code.

2 Disclosure's Scope

2.1 Products concerned

Alexion 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 to HCPs, HCOs and Patient Orgs, that practice or are registered in a country where disclosure obligations of the EFPIA Code of Practice apply, that are provided by Alexion, its affiliates and acquired (if not disclosed under the acquired company name separately) or merged companies irrespective of their location.

2.3 Excluded ToVs

2.3.1 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. Alexion applies these limits for Alexion 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.

2.3.2 Informational and educational materials and items of medical utility

As per Art 17 of the EFPIA Code of Practice and in accordance with section 18 of the Farmaindustria Code, there is no requirement to disclose items of medical utility provided to HCPs, nor educational or informational materials.

2.3.3 Logistical costs

Logistical costs related to Alexion Organised Meetings (for example room hire, technics, personnel) are excluded. However, ToVs to participants, such as support for travel and accommodation or speaker fees to HCPs are included in the relevant cost category.

2.4 ToVs date

Where the ToV is payment, values are reported on the date of the payment. Payments made in 2025 for activities related to 2024 are included.

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, through 3rd party values are reported on the date the event occurred or the payment to the third party is made.

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 in SAP and flow into Alexion 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 Alexion 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

Contribution to costs related to events paid through PCOs to the benefit of individual HCPs/HCOs must be reported on an individually named basis, or in the name of recipient PCO if the HCP/HCO is unknown.

2.6.3 Indirect ToVs through HCOs

Where ToVs are made to an individual HCP indirectly via an HCO, Alexion shall obtain the identity of HCP receiving the benefit, in accordance with Farmaindustria's guidelines. These will be disclosed against the HCP.

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 third parties are appointed by Alexion 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 neither the HCPs nor the HCOs benefit from them.

2.7 Non-monetary ToVs

Alexion only makes monetary transfers, either directly or indirectly through third parties, but not in kind.

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 cancellation of event, the associated costs are not reported, such as the cost of cancelling a hotel booking or accommodation. In the event of partial attendance, only the benefits actually received are reported.

Where Alexion is required 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

Alexion makes their best efforts to capture and report all ToVs to HCPs, HCOs, and POs 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 Alexion or by Clinical Research Organisations on Alexion's behalf that are prospective in nature are considered Research & Development ToVs and are reported on an aggregate basis.

2.11 Voluntary disclosure

Alexion does not make any voluntary disclosures beyond those required by the Farmaindustria Code.

3 Specific considerations

3.1 Country unique identifier

Alexion provides one unique identifier for any HCP, HCO, or PO that is to be reported. This ID is generated by Alexion and is used to ensure that transactions are reported against the correct recipient to facilitate collection of ToVs throughout Europe and across other affiliates. The publication includes the tax identification number (NIF or CIF) in anonymised form.

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, it is a legal entity.

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

3.3 Multi-year agreements

For agreements that extend over multiple years, Alexion 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 specifics

Spain follows the national code of good practice for the pharmaceutical industry – Farmaindustria EFPIA methodology and disclosures are aligned with Farmaindustria Code of Conduct and transparency requirements for transfers of value reported in Spain.

3.5 Quality Checks

Alexion aims to ensure that the data included in the publicly available disclosure reports is complete to the best of our knowledge. Alexion 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.

Data sources and controls:

- Sources: Finance and procurement records, event management systems, grant/sponsorship tools, CRO/vendor invoices, and contracts.
- Controls: Recipient validation, category mapping review, reconciliation to purchase orders/contracts, duplicate checks, and documented FMV estimations.
- Alexion 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 EFPIA Disclosure Code.

4 Consent Management

4.1 Consent collection

4.1.1 HCO and PO consent

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

4.1.2 HCP consent

In Spain HCPs are reported individually, without the need for a consent as outlined in the Farmaindustria disclosure requirements. Transfers of value of those PS inscribed on the lists of exclusion of suppliers of databases of PS used by Alexion will not be published due to technical impossibility.

4.2 **Legitimate interests**

Disclosure of payments towards HCPs, HCOs by pharmaceutical companies is mandatory pursuant to Farmaindustria code.

Regarding the right to object, in accordance with the provisions of the Spanish Data Protection Agency in its Report of 22 April 2026 (Annex I of the Code), if a Healthcare Professional, by exercising this right, were to demonstrate to Alexion that there are well-founded and legitimate reasons relating to their specific personal circumstances which would determine that the balancing test should be reversed and the legitimate interest in transparency underpinning such publication should not prevail, Alexion could exclude the data relating to that Healthcare Professional, publishing it in aggregate form on an exceptional basis.

5 **Form of disclosure**

5.1 **Date of publication**

The date of publication for Spain is 30 June in line with Farmaindustria requirements.

5.2 **Data retention**

Alexion maintains relevant records of the disclosures for a minimum of 5 years. The information disclosed shall remain in the public domain for a minimum of 3 years.

5.3 **Disclosure platform**

For Spain, disclosure is made at <https://www.astrazeneca.com/sustainability/ethics-compliance/astrazeneca-and-global-transparency.html#!> It is also made on Alexion website: <https://alexion.com/worldwide/spain>

5.4 **Disclosure language**

Disclosure is made in Spanish.

6 Disclosure financial data

6.1 Currency

Disclosure will be made in EUR. For in scope transactions requiring conversion, the calculation will be applied when the transaction is moved to the reporting environment, using the Alexion Uniform Reference Environment (AZURE) rates. AZURE is what Alexion utilizes for conversion rates for each currency.

6.2 VAT included or excluded

VAT and withholding taxes are not included.

6.3 Calculation rules

Payments from HCPs, PCOs, or HCOs to Alexion (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