



Incyte Biosciences Iberia Transparency Disclosure Methodological Notes for Reporting Year 2023

Introduction – Incyte Iberia’s commitment to transparency reporting

Incyte Biosciences Iberia S.L. (“**Incyte Iberia**”) has joined on June 29, 2023 the National Trade Association of the Spanish based pharmaceutical industry, Farmaindustria.

Incyte Iberia is committed to transparency about how Incyte Iberia operate as a business and to comply with the Code of Practice for the Pharmaceutical Industry (“Farmaindustria Code”). Therefore Incyte Iberia wants to ensure that the nature and scope of transfers of value (“**ToV**”) to Healthcare Professionals (“**HCPs**”), Healthcare Organisations (“**HCOs**”) and Patient Organizations (“**POs**”) are clearly and transparently disclosed to the public.

This Methodological Note provides guidance on how Incyte Iberia has recorded and publicly reported the ToV on the company website www.incyte.es in accordance with the Annex II of The Farmaindustria Code of Conduct. This Methodological Note is also published on the company website www.incyte.es .

Reporting period / Reportable ToV:

The Incyte Iberia disclosure includes applicable ToV to HCPs, HCOs and POs during the period between 29 June and 31 December 2023.

Medical scope

Incyte Iberia will disclose the ToV made to the following recipients, in compliance with GDPR and data protection regulations, as follows:

- *Recipient – HCPs:* ToV is disclosed on individual basis

Incyte Iberia utilizes the Farmaindustria Code of Conduct definition of 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 directly or indirectly in the prescription, purchase, supply, dispensation or administration of medicinal products for human use.

- *Recipient – HCOs:* ToV are disclosed on individual basis

Incyte Iberia utilizes the Farmaindustria Code of Conduct definition of 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.

- *Recipient – Patient Organizations:*

Incyte Iberia utilizes the Farmaindustria Code of Conduct definition of HCO



A non-profit organisation - including umbrella organisations to which they belong - composed primarily of patients and/or their caregivers that represents and/or supports the needs of patients and/ or their caregivers)

- *Research and Development:* ToV are disclosed in aggregated form.

Definition under Farmaindustria Code of Conduct as activities related to the planning or conduct of (i) non-clinical studies (as defined by the OECD “Principles of Good Laboratory Practices”), (ii) clinical trials (as defined by Regulation (EU) no. 536/2014 of the European Parliament and of the Council, by Royal Decree 1090/2015) and (iii) observational studies with medicinal products.

ToV Definitions

The categories covered by the ToV are based on Annex II of the Farmaindustria Code of Conduct:

- **HCPs ToV Types:**
 - Service agreements (service fees and out of pocket expenses)
 - Sponsorship event attendance (registration fees and travel & accommodation)
- **HCOs ToV Types:**
 - Grants and Donations
 - Provision of services (fees and related expenses)
 - Sponsorships of scientific, professional and educational meetings (Sponsorship agreements, registration fees and travel & accommodation)
- **POs ToV Types:**
 - Grants and Donations
 - Provision of services (fees and related expenses)

Privacy compliance in the disclosure of ToV's

The legal basis and justification for the publication of ToV without requiring the consent of the HCP, is the existence of a legitimate interest, according to the report of the Spanish Data Protection Agency of 22 April 2016, without any change having occurred after the entry into force of the GDPR, which continues to contemplate this legal basis in article 6.1.f of Directive 95/46/EC.

However, at the time of the first interaction, Incyte Iberia provides the Incyte Privacy Notice for HCPs and informs the HCP (in accordance with the GDPR (EU) 2016/276) about the disclosure of the data and the rights of the HCP in relation to their personal information.



Direct or Indirect payments

- *Direct payments:* all fees with HCPs, sponsorships, grants and donations with HCOs.
- *Indirect payments:* all hospitality such as travel and accommodation, meals are not included.

Paid Date

It is defined as the date the payment was actually provided to the covered Recipient.

Non Duplication

Where a ToV is made to an individual HCP indirectly via an HCO, such ToV shall only be disclosed once.

Cross border transactions:

Transactions resulting in ToV entered by Incyte affiliates with Spanish HCPs, HCOs or POs will be disclosed via the Annex II of The Farmaindustria Code of Conduct by Incyte Iberia.

Taxes:

Professional fees, sponsorships and related expenses/costs that are paid or reimbursed include VAT.

Grants and Donations are VAT excluded.

Currency:

All information is reported in EURO (€). In the event a ToV is made in another currency it shall be converted using exchange rates based on monthly average rates.

Publication retention period:

In accordance with Farmaindustria's guidelines, Incyte Iberia will ensure that published information remains in the public domain for at least 3 years from the publication of such information and in accordance with the method and language of information.

Correction of data in the ToV Report:

HCPs may request the amendment of data once the ToV has been published if they consider it not accurate. In this case, Incyte Iberia will correct and republish the corrected ToV.



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Objection of TOV disclosure by the HCP

HCP may exercise the right to object to the detailed disclosure, in which case, they must promptly inform Incyte in writing at Transparency_Spain@incyte.com and Incyte will then report in aggregate form the transfer of value without including the identity details.

Country Identifiers:

Incyte Iberia uses the National Identity Document (DNI) for HCPs and the Tax Identification Number (NIF) for HCOs to ensure that there is no doubt about the identity of the beneficiary.

Publication timelines:

Incyte Iberia will publish the ToV in line with the country timelines as defined by the Famaindustria Code.

Contact and Information:

Any queries regarding Incyte Iberia's reporting or corrections, should be addressed to Transparency_Spain@incyte.com or through the website www.incyte.es.