



## **Incyte Biosciences Austria Transparency Disclosure Methodological Notes for Reporting Year 2024**

### **Introduction – Incyte Austria’s commitment to transparency reporting**

Incyte Biosciences Austria (“**Incyte Austria**”) has joined on October 1, 2024 the National Trade Association of the Austria-based pharmaceutical industry, PHARMIG.

Incyte Austria is committed to transparency about how Incyte Austria operates as a business and to comply with the Code of Conduct for the Pharmaceutical Industry (“PHARMIG Code”). Therefore, Incyte Austria 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 Austria has recorded and publicly reported the ToV on the company website <https://incyte.at> in accordance with the PHARMIG Code.

### **Reporting period / Reportable ToV**

The Incyte Austria disclosure includes applicable ToV to HCPs, HCOs and POs during the period between 1 October and 31 December 2024.

### **Medical scope**

Incyte Austria 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 an individual basis

Incyte Austria’s 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 is disclosed on an individual basis

Incyte Austria’s 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 – PO:* ToV is disclosed on an individual basis

Incyte Austria’s definition of PO: 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 (R&D)*: ToV is disclosed in aggregated form.

Incyte Austria's definition of R&D 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:

- **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 Austria 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 Austrian HCPs, HCOs or POs will be disclosed on the company website <https://incyte.at>.

### **Taxes**

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

Grants and Donations are excluded from VAT.

### **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 PHARMIG's guidelines, Incyte Austria will ensure that published information remains in the public domain for at least three (3) years from the publication of such information, 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 inaccurate. In this case, Incyte Austria will correct and republish the corrected ToV. They can contact [Transparency\\_Austria@incyte.com](mailto:Transparency_Austria@incyte.com).

### **Objection of TOV disclosure by the HCP**

HCPs may exercise the right to object to the detailed disclosure. In such cases, they must promptly inform Incyte in writing at [Transparency\\_Austria@incyte.com](mailto:Transparency_Austria@incyte.com) and Incyte will then report the ToV in aggregate form, without including the identity details.

### **Publication timelines**

Incyte Austria will publish the ToV in line with the timelines defined by the PHARMIG Code.

### **Contact and Information**

Any queries regarding Incyte Austria's reporting or corrections, should be addressed to [Transparency\\_Austria@incyte.com](mailto:Transparency_Austria@incyte.com) or through the website <https://incyte.at>.