

Transparency & Disclosure Methodological Note for Transfers of Value to HCPs and HCOs

Report: Germany – AKG

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1. Transparency & Disclosure @ argenx

At argenx, we believe in the spirit and principles of co-creation, where working together with healthcare professionals (HCPs), healthcare organizations (HCOs), and patient organizations (POs) as a united “Healthcare Community” brings benefits to all.

Our work with HCPs, and academic and scientific leaders enables us to discover, investigate, and bring therapies to patients—achieving the unthinkable—changing lives. As we navigate this journey, we have a responsibility to educate HCPs about our therapeutic developments and the use, safety, and efficacy of our medicines.

We believe in fairly and appropriately compensating members of the Healthcare Community for their expertise and contributions to developing new medicines, improving patients’ lives, and advancing treatments and medical knowledge. Our relationships with the Healthcare Community include services for clinical investigations, advisory, sharing expertise at educational programs, and supporting knowledge sharing and advancements in healthcare through educational grants.

As a member of the German association, Arzenimittel und Kooperation im Gesundheitswesen e.V (AKG e.V)., we disclose Transfers of Value to HCPs and HCOs in accordance § 28 of the AKG Code of Conduct (AKG Transparency Rule). These disclosures provide awareness to patients and others and help ensure HCPs act in the best interest of patients when making treatment decisions.

Accordingly, this Methodology Document outlines our assumptions and decisions while preparing our disclosure under the AKG Transparency Rule.

2. Definitions

Healthcare Organisations (HCOs): Legal entities active in the healthcare industry and provide medical or research services. These include clinics, universities, consulting companies, educational institutions, and professional associations.

Healthcare Professionals (HCPs): Individuals active members of medical, dental, pharmacy, or other healthcare and nursing professions who are authorized to prescribe, acquire, deliver, or apply pharmaceuticals.

Reporting Period: The timeframe of ToVs included in the disclosure.

Transfers of Value (ToVs): Monetary benefits, cash or cash equivalent (e.g., check or wire transfer), in-kind items (e.g., airfare, lodging accommodation), or other non-cash benefits provided by argenx directly or through a third party.

3. Disclosure Approach

argenx believes disclosing ToVs to HCPs and HCOs is in the best interest of patients and supports the AKG Transparency Rule and its intent to “increase the public’s trust in an appropriate product and therapy selection without economic interest as well as to encourage fairer competition.”



3.1. One report

We publish one disclosure, per jurisdiction, detailing ToVs provided to HCPs and HCOs on behalf of all argenx affiliates globally. The disclosure includes ToVs provided by argenx's local affiliate in Germany as well as ToVs provided argenx entities operating outside of Germany who provide ToVs to German HCPs and HCOs, including cross-border activities.

3.2. Format

Disclosing ToVs in a consistent format, one utilized in multiple countries helps achieve our aim for public visibility and enables meaningful public consumption of these ToVs. Therefore, we disclose ToVs in the EFPIA format. In [Disclosure Categories](#) below, we describe how we disclose the ToVs required under the AKG Transparency Rule in the EFPIA format.

3.3. Aggregate Disclosure

We recognize there is a necessary balance to disclosing ToVs in the interest and benefit of the public and patients and respecting the data privacy rights of HCPs and HCOs under regulations, including the Federal Data Protection Act. With this in mind, we disclose ToVs in the aggregate, where we will include the sum of ToVs and the number of recipients receiving ToVs during the Reporting Period.

3.4. Currency

ToVs are disclosed in Euros (€). ToVs incurred in other currencies are converted into Euros using a daily exchange rate on the day the ToV was provided.

4. Disclosure Categories

Consistent with the AKG Transparency Rule, argenx discloses four categories of ToVs:

- (i) Research and Development
- (ii) Donations and Grants
- (iii) Monetary benefits in connection with training and educational events
- (iv) Services and consulting fees

Five categories of ToVs are explicitly excluded from the AKG Transparency Rule and therefore are not in argenx's disclosure:

- (i) The transfer of product samples, training materials or brochures
- (ii) Food and drink
- (iii) Discount and bonus regimes
- (iv) Minor benefits of minimal value (promotional articles and gifts)
- (v) Passive participation, as long as no costs are covered, such as travel and/or lodging costs



4.1. Transfers of Value to Healthcare Organisations

argenx discloses ToVs to HCOs as follows:

- a. **Donations** include monetary or in-kind support provided to an HCO in response to a request to support a bona fide purpose, such as indigent care, patient education, or public education.
- b. **Grants** include monetary or in-kind support provided in response to a request to support a specified intent, such as for continuing educational activities or, patient education or advocacy.
- c. **Educational event sponsorships** include ToVs provided directly or indirectly to HCOs for sponsoring educational events, including those provided to third parties who organize and manage these events on behalf of HCOs. Examples may include paying for exhibit space and advertising at scientific or professional meetings and congresses.
- d. **Fees and Reimbursement of expenses** include any other ToVs provided to an HCO in accordance with a written agreement in exchange for a good or service that does not fit into one of the above categories.

4.2. Transfers of Value to Healthcare Professionals

argenx discloses ToVs to HCPs as follows:

- a. **Registration fees at educational events** include fees paid to or on behalf of HCPs necessary to attend or enter a congress or other educational event.
- b. **Travel** includes direct or indirect ToVs provided to HCPs to attend congresses or other educational events. These may include airfare, train, taxi, or other travel methods. When incurred as part of a congress or other educational event, we disclose them within 'Travel & Accommodation.' When incurred as part of advisory or consultancy services, we disclose them as 'Reimbursement of expenses.'
- c. **Accommodation** includes direct or indirect ToVs provided to HCPs to attend congresses or other educational events. Accommodation includes costs for overnight hotels or other lodging venues. When incurred as part of a congress or other educational event, we disclose them within 'Travel & Accommodation.' When incurred as part of advisory or consultancy services, we disclose them as 'Reimbursement of expenses.'
- d. **Fees** include payments for advisory, consulting, speaking, or other bona fide services provided to argenx in accordance with a written agreement.

4.3. Research and Development

argenx discloses ToVs to HCPs and HCOs related to R&D as an aggregate value, a sum of all ToVs during the Reporting Period. These ToVs include those related to non-clinical studies, clinical trials, non-



interventional studies, externally sponsored research, and benefits received while participating in meetings related to R&D, such as investigator meetings.

5. Data Publication

5.1. Disclosure Platform

Disclosures shall be made on annual basis, within six months from the end of each disclosure period. Disclosures are published on argenx's Transparency & Disclosure website:

<https://www.argenx.com/transparency-disclosure>.

5.2. Language

Disclosure is made in German and English.

5.3. Consent

For disclosures related to ToVs made within 2023, disclosures are made only on an aggregated basis. Consent is not required as ToVs are disclosed in aggregate amounts and are not attributed to individual HCPs or HCOs.

6. Privacy Notice

To learn more about our general approach to data protection and our privacy practices, read our privacy policy available on our corporate website at <https://www.argenx.com/privacy-policy>. HCPs, HCOs, and POs may exercise their privacy rights by contacting our Privacy Office by email at privacy@argenx.com.