



Methodological Note

PHARMIG Code of Conduct

Purpose and Scope

Ultragenyx Pharmaceutical Inc. is committed to maintaining the highest standards of business integrity as we work to impact the lives of those living with a rare disease. This serves as the foundation for our Global Compliance Program. Ultragenyx's policy is to fully comply with all applicable laws and regulations in every jurisdiction where we do business.

In accordance with Ultragenyx's membership of the Association of the Austrian Pharmaceutical Industry (PHARMIG) and the Transparency provisions within the Code of Conduct, this methodological note reflects the data collection, aggregation, and reporting processes applied to any Transfer of Value (ToV) made during 2025 to reportable recipients.

Definition of Terms

Healthcare Professional: individuals authorized to apply, administer, or prescribe medicines, including physicians, dentists, veterinary surgeons, dental practitioners, midwives, and members of the nursing profession

Healthcare Organization: any legal person, association, or organization predominantly comprised of healthcare professionals such as hospitals, clinics, foundations, universities, or teaching institutions which render medical services or perform medical research, irrespective of their legal or organizational form, with the exception of patient organizations as set forth in Article 10 of the Code

Transfers of Value (ToVs): direct/indirect service or any direct/indirect in cash or in-kind performances, or any direct/indirect performances of any other nature that are provided directly or indirectly to any recipient

Direct Spend: transfers of value, payments or in-kind, made directly by Ultragenyx to the benefiting recipient

Indirect Spend: transfers of value, payments or in-kind, made through an intermediary (third party) on behalf of Ultragenyx to a benefiting recipient

Methodology for Identifying ToVs

The PHARMIG Code of Conduct requires that member pharmaceutical manufacturers disclose payments or transfers of value related to the following activities:

1. Research and development
2. Donations and subsidies
3. Events
4. Services rendered and consulting provided including expenses incurred.

To identify the scope of TOVs related to these activities, Ultragenyx has defined processes for capturing both direct and indirect spend.

Direct Spend: Ultragenyx engages and compensates Healthcare Professionals (HCPs) and Healthcare Organizations (HCOs) directly, without the use of an intermediary to manage components of that process. The payments and benefits provided as part of these engagements are captured in our Oracle system, a global Enterprise Resource Planning tool. This system has been structured to extract all potentially reportable transactions in accordance with defined filters into a standardized format. Data extracted from this system is reviewed by the appropriate local team(s) as well as the global compliance team for completeness and accuracy.

Indirect Spend: Ultragenyx utilizes the support of third party vendors to manage certain business activities that may result in reportable TOVs being made on our behalf. These are primarily to cover travel and accommodation for meetings, as well as the associated honoraria (as applicable). At the point in which a third party is engaged for these services, Ultragenyx conducts a formal onboarding process with these vendors to ensure that they're maintaining Ultragenyx's compliance standards and can provide a detailed report of associated spend they're providing to reportable recipients. Data provided by third party vendors is consolidated onto a standardized, excel based, data collection template. The review of this data is then treated the same as direct spend, as described above.

Cross-border engagements and ToVs: in instances where an HCP/HCO is engaged by an Ultragenyx affiliate outside of the country where the recipient has its primary practice, local teams are made aware of these engagements or interactions. Spend information tied to these interactions is captured in global systems and identified according to the standard direct and indirect capture practices outlined above.

In addition to the source system extracts that provide detail on in-scope transfers of value, an internal engagement tracker is maintained at the local level. This tool is used to reconcile our source system payments against the agreements managed in country.

Data Collection and Management

The date of the ToV dictates whether it's included in the respective reporting period's disclosure. The date of payment typically drives this determination, except in the following instances:

- Air / Ground Transportation: the ToV date is the departure date of the trip
- Accommodation: the ToV date is the last day of the stay

Please note: In cases where an activity took place in 2024, but payments were not made until 2025, these ToVs will be included in the 2025 report. Similarly, payments made in 2026 for activities that took place in 2025 will be included on the 2026 data submission.

According to the relevant reporting period, data is collected across direct and indirect sources. These data sets are then consolidated into a single, standardized format for further remediation and aggregation.

Currency management: Payments are generally made in the recipient's local currency, unless designated otherwise. In cases where a reportable payment's currency needs to be converted for local reporting purposes, the ToVs payment date (as described above) will be used as the reported conversion date.

Tax: As mandated by the Code of Conduct, payments for PHARMIG are reported exclusive of taxes.

Reporting Procedures

For the 2025 reporting period, Ultragenyx will submit an HCP aggregate disclosure. Individual payments are grouped by ToV type in accordance with the PHARMIG Standardized Disclosure Template and total amounts are tallied for submission.

Payments made to Healthcare Organizations are disclosed at the individual level. This is in accordance with § Art 6 Abs 1 lit f DSGVO as well as contractual stipulations.