



METHODOLOGICAL NOTE

on disclosure of Transfers of Value to Healthcare Professionals and Healthcare Organisations in EFPIA countries where Eisai does not have a direct presence

(Information for Reporting of 2020 Data)

1. Introduction

This note describes the methods used by Eisai to meet the obligations for disclosing Transfers of Value (ToV) made to Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs) in the following countries, where Eisai does not have a direct presence:

- Bulgaria
- Croatia
- Greece
- Hungary
- Latvia
- Poland
- Romania
- Slovenia

2. Definitions

The term **Transfer of Value** means a direct or indirect payment, whether in cash, in kind, or otherwise, made, whether for promotional purposes or otherwise, in connection with the development or sale of medicines.

The term **Healthcare Professional** includes members of the medical, pharmacy and nursing professions and any other persons who are in the course of their professional activities may administer, prescribe, purchase, recommend or supply a medicine.

The term **Healthcare Organisation** means a healthcare, medical or scientific association or organisation such as a hospital, clinic, foundation, university or other teaching institution or learned society whose business address, place of incorporation or primary place of operation is in the countries listed above or an organisation through which one or more HCPs provide services.

3. Scope

ToV is aggregated into total R&D and Non-R&D values.

Aggregated ToVs are not publicly disclosed against an individual or organisation. These ToVs are anonymized and included in a total lump sum value.

3.1 Excluded ToV

Food and drink costs are excluded from ToV disclosed in respect of Eisai organised and sponsored meetings. However, for sponsored meetings, where Eisai specifically contributes towards subsistence as part of a sponsorship, this will be included in the ToV disclosed.

ToV made by another company under a co-promotion agreement with Eisai are disclosed by the other company and not by Eisai.

Event costs, such as the rental of equipment associated with one-off events (for e.g. room hire, projector rental, audio visual equipment) are excluded from ToV disclosed in respect of Eisai organised meetings. However, for sponsored meetings, where Eisai specifically contributes towards rental of equipment, this will be included in the ToV disclosed.

3.2 ToV date

Eisai discloses the ToV based on the date the payment was made to the HCP or HCO.

3.3 Direct ToV

ToV can be made to the HCP or HCO directly, for e.g., payment to an HCP for giving expert advice in an Advisory Board or providing any other service that would be considered a 'fee for service' interaction.

3.4 Indirect ToV or Benefit in Kind (BIK)

ToV can be made to the HCP or HCO indirectly i.e., through any third party working on behalf of Eisai or as BIK.

An example of an indirect ToV would be a payment that is made to an HCO by Eisai in respect of activities undertaken by an HCP, where either the HCP requests the payment is made to the HCO or the payment is pursuant to a contract between Eisai and that HCO.

An example of a BIK payment would be registration fees paid by Eisai to a conference provider in respect of an HCP's registration fee for that conference.

3.5 ToV in case of partial attendances or cancellation

In the case of cancellation of a meeting or event, and where an HCP or HCO does not receive a fee for service/ BIK, the ToV is not included in the disclosure.

In the case of partial attendance, any ToV received by an HCP as funding, fee for service, or BIK will be included in the disclosure.

4. Specific considerations

4.1 Multi-year agreements

Any payments made against a multi-year contract are disclosed in the period covering the actual payment date.

5. Research & Development (R&D)

All R&D ToVs are aggregated by country as a single value. The ToVs related to the planning and conduct of non-clinical studies, interventional clinical trials and non-interventional clinical studies conducted by Eisai or by Contract Research Organisations and other third parties on Eisai's behalf that are prospective in nature are included in the aggregate reporting.

Non-interventional studies that are retrospective in nature are not considered to be R&D activities and are not included in the aggregate ToV sum.

6. Disclosure queries

Disclosure queries should be sent by email to Eisai_UK_ROI_disclosure@eisai.net or by post to:

UK & ROI Disclosure Reporting Lead
EMEA Medical Compliance Department
Eisai Limited
European Knowledge Centre
Mosquito Way
Hatfield, AL10 9SN

7. Disclosure Form

Eisai will disclose these ToVs on the company website, www.eisai.eu.

8. Financial data

8.1 Currency

Disclosure is made in Euro's. Exchange rates are applied to ToV using a yearly average exchange rate.

8.2 VAT included or excluded

ToVs are disclosed using gross values.

An exception to this is R&D ToV which are reported gross or net depending on how the data is captured and reported in third party payment systems.

