



ITALY

# METHODOLOGICAL NOTE

## on disclosure of transfers of value to healthcare professionals and organizations

(Information is stated as of 12 June 2026)

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## **INTRODUCTION**

"Industry and health care providers work together to help the patient. It is a relationship that has produced many innovative drugs and changed the way many diseases impact our lives. Industry and health care providers collaborate on many clinical research activities, share best clinical practices, and exchange information on how new drugs fit into the patient pathway. Making this, already well-regulated, vital relationship more transparent means strengthening the foundation for future collaboration. Society has high expectations regarding transparency, more than ever before in the health care industry "(EFPIA).

Eisai does not want to disappoint this expectation.

This note accompanies the publication of the Transfers of Value (TdV), which Eisai performs in compliance with the requirements of the EFPIA code and national pharmaceutical associations, regarding compensation to health care providers and organizations by pharmaceutical companies. This note includes a general summary and specific considerations on each Eisai affiliate.

## **DEFINITIONS**

Eisai recognizes the definitions of health care practitioner, health care organization, and transfer of value (TdV) as enunciated in the EFPIA code or local pharmaceutical codes of ethics.

## **DISCLOSURE'S SCOPE**

Eisai will publish TdVs to health care providers and organizations in countries where Eisai has a branch presence.

## **PERIOD OF PUBLICATION OF THE TOV**

For the purpose of publication, Eisai considers the date on which payment was made to the Operator or health care organization.

## **TOV IN DIRECT FORM**

TdV can occur in direct form, e.g., payment to a health care provider for consulting on an Advisory Board.

## **TOV IN INDIRECT FORM**

TdV can occur in indirect form, e.g., sponsorship through providers of physicians at conferences and congresses with payment of registration fee or travel and hospitality expenses.

In the case of indirect funding, if the TdV (net of agency fees) is known and consent to publication has been obtained from the health care provider, this will be done on an individual basis. Otherwise, disclosure will be made in aggregate form.

## **TOV IN CASE OF PARTIAL PARTICIPATION OR CANCELLATION**

In case of cancellation, the TdV will not be published since no value has been transferred. In case of partial participation, the TdV will be published.

## **COLLECTION OF CONSENTS**

For Transfers of Value to Health Care Operators published on an individual basis, Eisai shall acquire in advance, on an activity-by-activity basis - for each contract entered into - consent to the publication of personal data from the individuals concerned in accordance with the requirements of applicable data protection regulations. If within the year the Healthcare Provider has denied consent at least once, all relevant TdV will be published in aggregate form.

TdVs related to contracts where consent to individual publication is lacking will also be published in aggregate form. In aggregate, the number of traders who refused consent and the total amount will be reported.

## **FORM OF DISCLOSURE**

Disclosure is made on Eisai's website in the relevant country.

## **MULTI-YEAR CONTRACTS**

For payments made against multi-year contracts, the date of actual payment will be the date of payment.

## **MULTIPLE AGREEMENTS WITH HEALTH ORGANIZATIONS**

Eisai publishes the amount paid to the health care organization established as the provider in its financial system.

## **RESEARCH AND DEVELOPMENT:**

All TdV conducted by Eisai related to the management of clinical trials, non-clinical studies, and non-interventional studies are reported on an aggregate basis.

## **EXCLUDED TDVS**

Eisai has acknowledged that some TdVs are not subject to publication, as per EFPIA code or local pharmaceutical codes of ethics.

- TdVs performed by another company as part of a co-promotion agreement with Eisai will be disclosed by the other company;
- TdVs recognized as part of a market research study in which Eisai does not know the identity of the participating health care providers or organizations will be published on an aggregate basis, if the data is available;
- event-related costs, such as equipment rental associated with one-time events, room reservation, video projector and audiovisual equipment rental;
- TdV made against a group of health workers, such as group transportation (rental of a bus for an event), will be published on an aggregate basis, if the data is available.

## **ACTIVITIES ABROAD**

The publication of TdVs must be carried out under the code of the country where the health care provider has its residence, or where the health care organization has its registered office, whether the TdV occurs within or outside that country.

If a health care provider changes his or her residence, the information will be disclosed in the place of residence at the time of publication.

## **DISCLOSURE FINANCIAL DATA**

### **Currencies**

Amounts are published in local currency. Exchange rates are official rates and used internally by Eisai. An average rate related to the period of disclosure is applied to TdV.

### **VAT included or excluded**

TdV are published net of VAT and gross of withholding tax.

**Calculation rules**

The value of the donation subject to publication will be the market value of the donated item (FMV).

