



Version: 5 24/02/2026

Country: United Kingdom

# Eisai Limited

## Methodological note for HCP/ORDM/HCO disclosure 2025

Data year: 2025

Year of publication: 2026

### Introduction

Eisai Limited (hereinafter referred to as “Eisai”) fully supports the transparency requirements in the Association of the British Pharmaceutical Industry (ABPI) Code of Practice and is committed to making public the details of all transfers of value (ToV) made to healthcare professionals (HCPs), other relevant decision makers (ORDMs) and healthcare organisations (HCOs).

This note describes the methods used by Eisai to meet its obligations and the requirements for disclosing payments and ToV made to HCPs, ORDMs and HCOs as outlined in the EFPIA HCP/HCO Code of Practice and reflected in the ABPI Code of Practice for the Pharmaceutical Industry.

Transfers of Value made to Patient Organisations and Members of the Public, including Patients and Journalists, are disclosed separately on the Eisai EMEA corporate website [www.eisai.eu](http://www.eisai.eu)

### Contents

<b>1. Definitions</b> .....	3
<b>1.1 Recipients</b> .....	3
<b>1.1 Kind of ToVs</b> .....	3
<b>2 Disclosure’s Scope</b> .....	4
<b>2.1 Products concerned</b> .....	4

<b>2.2 Company concerned</b>	4
<b>2.3 Excluded ToVs</b>	4
<b>2.4 ToVs date</b>	5
<b>2.5 Direct ToVs</b>	5
<b>2.6 Indirect ToVs</b>	5
<b>2.7 Non-monetary ToVs</b>	5
<b>2.8 ToVs in case of partial attendances or cancellation and refund</b>	5
<b>2.9 Cross-border activities</b>	6
<b>2.10 R&amp;D</b>	6
<b>2.11 Voluntary disclosure</b>	6
<b>3. Specific considerations</b>	6
<b>3.1 Country unique identifier</b>	6
<b>3.2 Self-incorporated HCP</b>	7
<b>3.3 Multi-year agreements</b>	7
<b>3.4 Country specificities</b>	7
<b>3.5 Quality Checks</b>	7
<b>4. Data protection legal basis</b>	7
<b>4.1 Consent collection</b>	7
<b>4.2 Legitimate interests</b>	7
<b>5. Form of disclosure</b>	8
<b>5.1 Date of publication</b>	8
<b>5.2 Disclosure platform</b>	8
<b>5.3 Disclosure language</b>	8
<b>6. Disclosure financial data</b>	8
<b>6.1 Currency</b>	8
<b>6.2 VAT included or excluded</b>	8
<b>6.3 Calculation rules</b>	9
<b>7. Additional Information</b>	9

# 1. Definitions

## 1.1 Recipients

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

Eisai will disclose ToV made to retired HCPs, provided they have a licence to practice. Retired HCPs without a licence to practice are considered members of the public.

Payments to deceased HCPs are included as the data is based on ToV given at the time of provision.

The term **Other Relevant Decision Maker** (ORDM) include those in a role that could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply, or use of any medicine but who is not an HCP. ORDMs are included in the disclosure report in the HCP disclosures.

The term **Healthcare Organisation** (HCO) 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 Europe or an organisation through which one or more HCPs or ORDMs provide services.

Where an HCP or ORDM undertakes activities on behalf of an HCO, and where the HCO has been paid for this service, Eisai will disclose against the HCO, however related expenses claimed by the HCP/ORDM will be reported against that individual.

Organisations providing educational services to HCPs are included as HCOs.

As described in this methodological note, there are cases where the ToV are aggregated. **Aggregated ToV** are not publicly disclosed against an individual HCP/ORDM or HCO and have been anonymised as much as possible.

## 1.1 Kind of ToVs

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. ToV include:

- fees and expenses paid for contracted services by Eisai to HCPs and ORDMs, or to their employers on their behalf. Services include but are not limited to participating in advisory boards, chairing or speaking at meetings

- fees and expenses paid for contracted services such as consultancy between Eisai and institutions, organisations, or associations of health professionals.
- support of attendance provided by Eisai for HCPs and ORDMs at events/meetings. This includes registration fees and expenses in the form of travel and accommodation
- sponsorship, including contributions to costs related to events/meetings, paid by Eisai to HCOs or to organisations managing events on Eisai's behalf. This includes direct funding such as sponsorship fees in return for Eisai having an exhibition stand, and indirect support such as paying for the venue hire/catering directly to the service provider. Sponsorship may also include support of HCPs not known to Eisai via the HCO by way of registration fees, accommodation and travel. Sponsorship paid to third parties where the HCO beneficiaries are not defined are disclosed against the third-party Professional Conference Organiser.
- donations and grants provided by Eisai to HCOs, institutions, and other organisations for the purpose of supporting research, education or healthcare with no consequent obligation on the recipient organisation, institution. Grants are the reactive provision of funds following a request, whereas donations are in the form of physical items, services, or benefits in kind.
- provision of patient support services or package deals involving services delivered by an HCP. Eisai has no related ToV to report for 2025.
- collaborative working between Eisai, HCOs, and other organisations which either enhances patient care or is of benefit to patients, or benefits the NHS and at a minimum maintains patient care. Joint Working is a type of Collaborative Working. Eisai has no related ToV to report for 2025.

## **2 Disclosure's Scope**

### **2.1 Products concerned**

Prescription only medicines

### **2.2 Company concerned**

Eisai Limited UK, Eisai Europe Limited UK

### **2.3 Excluded ToVs**

Eisai has concluded that certain ToV are not covered by the EFPIA and the ABPI Codes of Practice, and therefore Eisai does not disclose such 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.

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.

Promotional aids and items for patient support (as defined by Clauses 1.25 and 26.3 of the 2024 ABPI Code) are also not included for disclosure

Donations to HCOs that are funded by employee contributions are not reported (however gift matching contributions from Eisai are reported).

## **2.4 ToVs date**

Eisai discloses the ToV based on the date the payment was made to the HCP, ORDM, or HCO. This disclosure report covers payments made between 1<sup>st</sup> January 2025 and 31<sup>st</sup> December 2025.

## **2.5 Direct ToVs**

Direct ToV are made directly by Eisai for the benefit of an HCP, ORDM or HCO e.g. a payment made to an HCP for giving expert advice in an Advisory Board.

## **2.6 Indirect ToVs**

Indirect ToV are made on behalf of Eisai through a third party for the benefit of an HCP, ORDM or HCO e.g. a payment made to an HCP via a third-party agency, or registration fees paid by Eisai to a conference provider in respect of an HCP's registration fee for that conference.

Where a third party is appointed by an HCO to manage an event, and where the HCO benefits from that ToV, any such payments are disclosed against the HCO. If an event is organised on behalf of multiple HCOs and the actual amount per HCO cannot be ascribed, Eisai will split the total amount evenly and disclose against the individual HCOs.

Where indirect ToV is paid to HCP/ORDMs via a third party contracted activity e.g. a market research study, and so Eisai does not know the identity of the participating HCPs or ORDMs, the ToV is disclosed in aggregate.

## **2.7 Non-monetary ToVs**

Non-monetary ToV include activities where Eisai may provide benefit in kind such as Eisai staff time, third-party staff time, or donations of physical items.

## **2.8 ToVs in case of partial attendances or cancellation and refund**

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

In the case of partial attendance, any ToV received by an HCP or ORDM will be included in the disclosure.

In the case of non-attendance by an HCP/ORDM at an event where support e.g. accommodation, has been paid for by Eisai, there will be no disclosure of ToV against the HCP.

In the case of compensation paid to an HCP/ORDM because of delayed travel, this is regarded as a personal matter for the HCP/ORDM, and the refund amount would not be included in the disclosure report.

## **2.9 Cross-border activities**

Disclosure of ToV is made pursuant to the national code of the country where the HCP or ORDM principally practices or where the HCO has its principal place of operation, whether the ToV occurs in or outside of that country.

If an HCP or ORDM changes their principal country of practice, then their ToV data will be disclosed for where the HCP or ORDM has their principal place of practice as at the time of disclosure.

As a result, ToV made to UK HCPs and HCOs by Eisai's regional and global teams based in the UK, and by Eisai affiliates worldwide, are disclosed against those UK HCPs and HCOs, regardless of the location of the activity or the location of the interaction owner.

## **2.10 R&D**

The ToV to HCPs or HCOs 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 in scope of disclosure. All R&D ToV are aggregated as a single value.

## **2.11 Voluntary disclosure**

Not applicable to Eisai's 2025 disclosure.

# **3. Specific considerations**

## **3.1 Country unique identifier**

Unique commercial identifiers provided by the transparency reporting solution used by Eisai, are used to identify and report against UK HCPs and HCOs.

### **3.2 Self-incorporated HCP**

Where an HCP/ORDM is the sole or majority owner of their own company and Eisai have made a ToV to that company, Eisai will disclose against the individual HCP/ORDM.

### **3.3 Multi-year agreements**

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

### **3.4 Country specificities**

When working with another company under a co-promotion agreement, or other joint venture, Eisai will disclose the ToV made to an HCP, ORDM, or HCO, when Eisai is the contracting party and has made the payment to the HCP/ORDM/HCO.

### **3.5 Quality Checks**

All payments to HCPs, ORDMs, and HCOs are checked on a monthly basis before and after upload to the transparency reporting solution. The final disclosure report is checked by disclosure administrators, reviewed and approved by the relevant business unit leads, with a final approval by the Medical Director for UK before submission to Disclosure UK.

## **4. Data protection legal basis**

### **4.1 Consent collection**

Eisai will disclose any ToV upon the lawful basis of pursuing its legitimate interests.

Eisai can disclose all applicable HCO ToV without the need for a lawful basis under data protection laws where these disclosures will not involve personal data.

### **4.2 Legitimate interests**

Eisai relies on the lawful basis of *legitimate interests* to disclose ToVs made to HCPs and ORDMs. These legitimate interests include complying with the requirements of the ABPI Code of Practice and promoting transparency and public confidence in interactions between the pharmaceutical industry and HCPs/ORDMs.

Eisai balances these interests against the rights and freedoms of individuals by clearly explaining how personal data will be used and by taking into account the reasonable expectations of HCPs and ORDMs. Individuals have the right to object to the individual disclosure of their ToV, and any objection is assessed using a structured balancing test. Where an objection is accepted, the relevant ToV are disclosed in aggregate; where it is not accepted, ToV are disclosed on an individual basis. Further information on how Eisai

processes personal data, including individual rights, is available in Eisai's Privacy Notice at <https://www.eisai.eu/privacy-policy/>.

If an HCP or ORDM wishes to object to individual disclosure, they may either:

- contact the UK & ROI Disclosure Reporting Lead by email at [Eisai UK ROI disclosure@eisai.net](mailto:Eisai_UK_ROI_disclosure@eisai.net)., for those cases where the ToV has not been published by the ABPI on the disclosure portal, Disclosure UK.
- raise a direct query on Disclosure UK in the first instance or contact the UK & ROI Disclosure Reporting Lead by email, for those cases where the ToV has been published on Disclosure UK. For any queries received by Eisai, Eisai will raise the query via Disclosure UK on the HCP/ORDM's behalf.

If an HCP wishes to retract an objection, this should be done via the same route that the objection was raised.

## **5. Form of disclosure**

### **5.1 Date of publication**

30/06/2026

### **5.2 Disclosure platform**

Disclosure UK – [www.disclosureuk.org.uk](http://www.disclosureuk.org.uk)

### **5.3 Disclosure language**

English

## **6. Disclosure financial data**

### **6.1 Currency**

GBP.

Exchange rates are applied to ToV, including R&D ToV, using a yearly average exchange rate.

### **6.2 VAT included or excluded**

ToV 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.

### **6.3 Calculation rules**

Donations of physical items are disclosed using the fair market value (FMV) of the item.  
Other benefits in kind are calculated as documented in the agreement related to the activity.

## **7. Additional Information**

All queries on ToV published on Disclosure UK are raised on Disclosure UK either by the HCP/ORDM/HCO directly, or by Eisai on behalf of the HCP/ORDM/HCO and then managed via this platform.

All ToV data remains in the public domain for three years from the time of first disclosure

Eisai retains all disclosure records for a minimum of 5 years after the end of the calendar year to which they relate.