

Mitsubishi Tanabe Pharma Group

Methodological note for HCP /

ORDM / HCO disclosure 2025

Data Year: 2025

Year of Publication: 2026

Under the European Federation of Pharmaceutical Industries and Associations (EFPIA) Code of Practice 2019 pharmaceutical companies are required to document and disclose Transfers of Value made to HCOs and HCPs in Europe on an annual basis.

The document should be read alongside the data published for the 2025 period and is provided to help understand the companies procedure and policies in publishing the data.

The primary contacts regarding this guidance and enforcement of this process are Dr Martin Davies, Managing Director and Ms Ashley McGurl, Account & Disclosure Manager, Corporate Management Department of the Mitsubishi Tanabe Pharma Europe office.

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1. Definitions

1.1 Recipients

Recipients of the Transfers of Values included in this disclosure are noted and defined as follows,

Healthcare Organisations (HCO)

means either 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 health professionals or other relevant decision makers provide services. If a healthcare organisation consists of only one health professional or other relevant decision maker, then it would be subject to the requirements in the code regarding individual health professionals.

If a ToV takes place to a HCO but a HCP is identifiable as the recipient then the disclosure will take place under the HCP and only be disclosed once.

Healthcare professional (HCP)

includes any member of the medical, dental, 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. In relation to the annual disclosure of transfers of value the term also includes any employee of a pharmaceutical company whose primary occupation is that of a practising health professional.

Other relevant decision maker (ORDM)

particularly includes someone with an NHS role who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply or use of any medicine but who is not a health professional, this could also refer to a retired healthcare professional who may hold influence due to knowledge, experience and reputation.

Transfers of Value relating to retired or non-practising HCPs with no incorporated business and therefore no business address shall be disclosed on an aggregate basis (irrespective whether consent is given or not) in order to safeguard privacy through avoidance of the requirement of mandatory disclosure of the HCP's address

Within the United Kingdom Patient Organisations are published separately and can be found on a separate page of our corporate website and a different area of the Disclosure UK database. However for EFPIA disclosures they include PO engagements as part of the published template, and therefore will be referred to in this document.

Patient Organisation's (PO)

means an organisation mainly comprising of patients and/or caregivers or any user organisation such as a disability organisation, carer or relative organisation and consumer organisation that represents and/or supports the needs of patients and/or caregivers.

1.2 Kinds of ToVs

For the purpose of this disclosure a Transfer of Value (ToV) means a direct or indirect transfer of value, whether in cash, in-kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development or sale of medicines. A direct transfer of value is one made directly by a company for the benefit of a recipient. An indirect transfer of value is one made on behalf of a company for the benefit of a recipient or through an intermediate and where the company knows or can identify the recipient that will benefit from the transfer of value..

There are a number of different types of ToVs which are separated within the disclosure data template

Research and Development (R&D) ToVs are calculated as an aggregated amount per country and not individually named like Non Research & Development (Non-R&D) where the HCP, ORDM and HCO are listed with a details of the ToV/engagement.

Types of ToVs that can be made to a HCO and their definitions are listed below.

Donations and Grants

In General Donations are physical items, services or benefits-in-kind which may be offered or requested, Grants are the provision of funds and may only be made if:

- they are made for the purpose of supporting healthcare or research.

- they are documented and kept on record by the donor/grantor; and
- they do not constitute an inducement to recommend, prescribe, purchase, supply, sell or administer specific medicinal products.
- this may include Medical & Educational Goods & Services (MEGS)
- requires Certification of the interaction in advance (UK).

Donations and Grants to individuals is strictly prohibited.

Contribution to costs related to Events

Contributions made through HCOs or third parties, including sponsorship for HCPs to attend Events, such as:

- Registration fees.
- Sponsorship agreements with HCOs or with third parties appointed by a HCO to manage an Event,
- Travel and accommodation fees to support the attendance of individuals to an event.

When providing sponsorship of events/meetings to an organisation, such contributions may include costs for subsistence (food & drink) but must be kept in line with the European Threshold for meals and drinks published by EFPIA,

Sponsorship

means a contribution, financial or otherwise, in whole or in part provided by or on behalf of a company, towards an activity (including an event/meeting or material) performed, organised, created etc by a healthcare organisation, patient organisation or other independent organisation.

Contracted Services

Transfers of Value resulting from or related to agreements between MTPG Company and institutions, organisations or associations of HCPs under which such institutions, organisations or associations provide any type of services to MTPG Company or any other type of funding that is not covered by disclosure as either a Donation/Grant or Contribution to costs related to Events.

Collaborative Working

refers to pharmaceutical companies working with other organisations to deliver initiatives which either enhance patient care or are for the benefit of patients or alternatively benefit the National Health Service (NHS) and, as a minimum, maintain patient care Collaborative working engagements will be published with a executive summary on the corporate website detailing those involved and the benefits for each party.

Types of ToVs that can be made to a HCP and ORDM and their definitions are defined below.

Registrations Fees and Support

in this context is the provision of a financial contribution, in whole or in part, whether paid directly or indirectly to individual health professionals or other relevant decision makers to attend events/meetings this may include travel and accommodation costs.

Contracted Services

Transfers of Value resulting from or related to agreements between MTPG Company and HCPs under which HCPs provide any type of services to a MTPG Company or any other type of funding that is not covered by Contribution to costs related to Events. This includes any employee of a pharmaceutical company whose primary occupation is that of a practicing health professional

2 Disclosure's Scope

2.1 Products concerned

This Disclosure is made in relation to commercialised Prescription Only Medicines (POMs), the research and development of POMs and the development of Medical Devices used with POMs where engagements and ToVs with HCP's HCO's and ORDM's have occurred.

2.2 Company concerned

On December 1st 2025 the Mitsubishi Tanabe Pharma Group changed the company name from Mitsubishi Tanabe Pharma to Tanabe Pharma, Please see section 7, Additional Information for further details of this company name change.

Although this Disclosure is managed by Mitsubishi Tanabe Pharma Europe Ltd the data provided is collected from all company affiliates within the Mitsubishi Tanabe Pharma Group (MTPG). The Affiliates and subsidiaries are those that engage within Europe and who have provided data are listed below.

- Mitsubishi Tanabe Pharma Corporation (MTPC) based in Japan
- Mitsubishi Tanabe Phara Europe Ltd (MTPE) based in United Kingdom
- Mitsubishi Tanabe Pharma GmbH (MTPD) based in Germany with branches in Vienna, Austria and Zug, Switzerland
- NeuroDerm Ltd (ND) based in Israel
- Mitsubishi Tanabe Pharma America Inc (MTPA) based in United States

Each MTPG company listed above is responsible for the collation of ToVs made directly by themselves or Indirectly by a third party. Each company will complete internal data collection templates requested by MTPE for all engagements and ToVs that have taken place in the calendar year, this data is then checked and consolidated into one disclosure template for the group company and published in line with national Code of Practice. By collecting the data on an individual company basis each individual ToV can be tracked and ensure no data is missed for the reporting period.

2.3 Excluded ToV's

Some things that may appear to be a ToV but are excluded in accordance with the Code of Practice, some of these instances may be, ToVs solely related to Over the Counter (OTC) medicines, sales of medicines to a HCP or HCO, samples of medicines or inexpensive stationary items provided at meetings & events where a strict cost limit is already in place.

2.4 ToVs date

The period covered by this disclosure is 1st January to 31st December 2025

If an agreement has been made or signed outside of this period but the ToV or payment was made in the 2025 calendar year the ToV will fall within scope of this disclosure.

2.5 Direct ToVs

Direct ToVs are those made directly by a MTPG company for the direct benefit of HCP, ORDM or HCO, these ToVs may include fees for services such as consulting and speaker fees, Travel & accommodation, Sponsorship, Registration Fees, Donations & Grants, Collaborative working etc.

2.6 Indirect ToVs

ToV's can be made via Third Parties and are classified as Indirect, this means a legal person/entity or individual that represents MTPG or interacts with other parties on behalf of MTPG relating to the company's medicine, such as distributors, wholesalers, consultants, contract research organisations, professional congress organisers, contracted sales forces, market research companies, advertising agencies, media buyers, providers of services related to events, public relations services, non-clinical services, non-interventional studies management services etc. Indirect ToVs are collected on separate templates by the group member company who contracted with the third party for tracking purposes.

2.7 Non-Monetary ToVs

Non-Monetary ToV's will fall within the definition of a Donation and may include physical items such as equipment, medical supplies and benefits-in kind such as a staff members time, if possible a monetary value will be included as part of this disclosure.

In 2025 between January and March the following staff volunteering occurred, due to any calculated cost being equivalent of a staff members salary no monetary value has been added, however to recognise the ToV the engagement has been included in the data collection published. Details of this ToV are as follows.

Staff Volunteering – Mid and South Essex NHS Foundation Trust - GBP 0.00

After a government call for volunteers for local Hospitals and Covid centres during the pandemic, we as a company fully supported staff who wished to step forward and volunteer in their own time and within working hours.

During 2025 our volunteer staff continued to help, some of these duties included supporting patients through booking appointments and arranging travel as well as ad-hoc administration tasks within the hospital, all while completing their normal duties to the company.

2.8 ToVs in case of partial attendances or cancellation and refund

On occasions a ToV may take place to cover event costs or registration fees, MTPG will always try to disclose under the individual is possible to identify them however when attendance may be lower than expected the unused registration fees will be disclosed against the HCO unless refunded.

If a ToV is made and then refunded an acknowledgement will still be made of the engagement with a possible monetary value of 0.00, should the ToV take place in one reporting year and a refund be issued in a different year this could result in a negative value being disclosed.

There are no 2025 instances of the above, however further details of ToVs will be provided here in such circumstances.

In the case that MTPG make a ToV that is cancelled before any ToV takes place it will not be included in the years disclosure.

2.9 Cross-border activities

Cross border activities are managed by the contract holder and disclosed by that member of the MTPG group company. Local MTPG group members may advise and collaborate with the group member to offer in site, guidance, advice and information on local laws and code requirements.

2.10 R&D

All data disclosed within the R&D section will fall within the following definition

Research and Development

means, for the purposes of disclosure, transfers of value to health professionals or healthcare organisations related to the planning or conduct of:

- i. **non-clinical studies** (as defined in the OECD Principles on Good Laboratory Practice)
- ii. **clinical trials** (as defined in Regulation 536/2014)
- iii. **non-interventional studies** that are prospective in nature and that involve the collection of patient data from or on behalf of individual or groups of health professionals specifically for the study.

Further examples of this may include Key Opinion Leader (KOL) fees and meetings, Advisory Board Member fees and meetings and Steering Committee Member fees and meetings.

This data is disclosed as an aggregated amount per country.

2.11 Voluntary disclosure

Disclosures have been provided as required by the relevant codes of practice for the country.

Any information that goes beyond what is required by the code will be described here, in 2025 MTPG have no voluntary disclosures to be made.

3 Specific Considerations

3.1 Country Unique identifier

Mitsubishi Tanabe Pharma does not use unique country identifiers for data collections, this is due to the multiple companies within MTPG that collect data and each disclosing country having one or more types of identifiers for HCPs and HCOs.

3.2 Self-incorporated HCP

If MTPG engage with a HCP with their own limited company we will request permission to disclose against them as an individual at their primary place of practice, if this is a business address for their company this address will be used against their name as a HCP rather than as a HCO.

3.3 Multi-year agreements

If an agreement takes place over multiple years it will be disclosed the year the ToV takes place, if additional ToVs take place in following years they will also be disclosed in the year the ToV takes place in accordance with disclosure requirements.

3.4 Country specifications

Due the Mitsubishi Tanabe Pharma Group having established entities throughout Europe a number of European and country code of practices are followed as well as relevant local applicable laws. The following codes of practices have specific publication requirements such as data templates and language requirements.

In countries with established entities the disclosure requirements are followed in accordance with local requirements, for countries with no legal entity the overarching code followed for disclosure is the EFPIA.

EFPIA Code: The European Federation of Pharmaceutical Industries and Associations EFPIA Code of Practice 2019 – Chapter 5.

ABPI Code: The Association of the British Pharmaceutical Industry Code of Practice 2024 – Clause 28.

AKG Code: Code of Conduct of the members of The Medicinal Products and Cooperation in Health Sector, (*Arzneimittel und Kooperation im Gesundheitswesen e.V – AKG*) 2021 – Section 6.

PHARMIG Code: Association of Austrian Pharmaceutical Industry Code of Conduct & Rules of Procedure 2020 – Article 9.

Pharma Corporation Code: Code of Conduct of the Pharmaceutical Industry in Switzerland 2020 – Section 2

Countries that may be included in MTPG annual Disclosure and EFPIA members or member associations include

COUNTRY				
Austria	Belgium	Bulgaria	Croatia	Cyprus
Czech Republic	Denmark	Estonia	Finland	France
Germany	Greece	Hungary	Ireland	Italy
Latvia	Lithuania	Malta	Netherlands	Norway
Poland	Portugal	Romania	Russian Federation	Serbia
Slovakia	Slovenia	Spain	Sweden	Switzerland
Turkey	Ukraine	United Kingdom		

3.5 Quality Checks

During the reporting year and in the pre disclosure period a number of quality checks are carried out.

MTPG use standardised contract and agreement templates, but if additional requirements are needed or advise is sought it can be discussed with the disclosure manager, legal teams and relevant local entities are available to offer guidance and in some cases certification. In addition to this SOPs and training is in place so that staff understand the code requirements.

Internal data collection templates for MTPG depend on the recipient of the ToV as the information needed has different requirements, Direct and Indirect templates are submitted separately. The internal templates used by MTPG include

- R&D
- HCO
- HCP
- PO

During the internal data collection period and during pre-disclosure a contact within each group company member is contacted and allocated the task from the disclosure manager, to ensure there is no double disclosure from different member of the same company or team, this person is then responsible for delegating and contacting individual staff members and departments within their own company for information to be disclosed, this may mean those delegates will need to reach out to third parties they have engaged with to request they complete the internal Indirect templates. Internal templates include the published template information but also additional information including contract information including responsible staff member, consent, internal references so the data can be tracked and copies of documents such as agreements, invoices and CVs. The initial contact will ensure all data is collected from within their company and subsidiaries, This is completed to a set deadline so that the Disclosure Manager has time to complete checks and request additional follow up information before submission and publication.

This is completed to a set deadline so that the Disclosure Manager has time to complete checks and request additional follow up information before submission and publication.

Once the data has been received by the disclosure manger submitted data sheet is reviewed.

For R&D data this file is re-saved as a new version per group company with additional information such as totals per country, conversions and exchange rates, any information out of scope of this disclosure are removed from this checked data version.

For non-R&D and PO data the disclosure manager will review the information and any documents provided for each individual line to ensure addresses are correct, the ToV type is accurate per the definitions and agreements in place, consent has been provided, the information is within scope of the disclosure and any currency conversions that are required. This information is then re-saved as a new version per group company

The Disclosure Manager will then enter all confirmed and checked data into the necessary country templates.

Ultimately the data supplied will go through three stages,

- Data collection - raw data provided
- Checked data - with changes and conversions
- Final data - publishable data in required templates

This allows MTPG to track each individual ToV back to where and whom submitted it and any amendments made before publication

4 Data protection legal basis

4.1 Consent collection

Mitsubishi Tanabe Pharma Group use consent as the lawful basis to publish the data on individuals HCPs, ORDMs, HCOs and POs.

Each agreement signed within the MTPG will include a section regarding disclosure and request to disclose the data and engagement as a ToV in accordance the local country codes of practice. If request is denied by an individual or company then this will be disclosed as an aggregated amount with no identifiable information shared.

Once disclosure has taken place and been published the right to withdraw consent remains in place for the 3 years the data is publicly available, any data published where consent is withdrawn will immediately be reviewed and moved into the aggregate section of the data files and re-published.

4.2 Legitimate interests

Not Applicable as MTPG use Consent to disclose.

5 Form of disclosure

5.1 Date of publication

The data is published on 30/06/2026

5.2 Disclosure Platform

The United Kingdom Data is published on Disclosure UK

<https://disclosureuk.org.uk/>

All other countries data can be found on the Tanabe Pharma Europe Corporate website

<https://eu.tanabe-pharma.com/transparency/>

5.3 Disclosure Language

This document is made available in English, French and German on the corporate website.

All data templates are provided in English, additional languages are made available for local country templates for Austria (German), Germany (German), Switzerland (German & French)

6 Disclosure financial data

6.1 Currency

Each country disclosure is published in one currency. This is clearly stated on each published template.

In order to publish just one currency per country a currency conversion may be required, the currency selected for the reporting period may be amended depending on the number of payments, most commonly used currency and the value of payments made to that country

during the reporting period, this is to reduce the possibility of rounding differences or due to country specific requirements.

The currencies used in the 2025 data are shown below.

Countries with no data to disclose for the 2025 period are not listed below.

COUNTRY	CURRENCY	COUNTRY	CURRENCY
United Kingdom	GBP	Austria	EUR
Belgium	EUR	Bulgaria	BGN
Czech Republic	CZK	Denmark	EUR
France	EUR	Germany	EUR
Italy	EUR	Netherlands	EUR
Norway	NOK	Poland	PLN
Portugal	EUR	Slovakia	EUR
Spain	EUR	Sweden	SEK
Switzerland	CHF		

When the data is collected from MTPG members the original payment data is requested, to centralise the process a rate is then taken at the close of data collection year (December) and the same rate is used for all ToV currency conversions throughout the period, reversing the currency conversion will allow the recipient to agree the received amount of their ToV. Details of the currencies and conversion rates for the 2025 period can be found below.

Original Currency	Conversion Currency	Exchange Rate Used
United States Dollars (USD)	British Pounds (GBP)	1.3451
United States Dollars (USD)	Euro (EUR)	1.1744
Japanese Yen (JPY)	Euro (EUR)	184.0891
Euro (EUR)	Polish Zloty (PLN)	4.2224
Euro (EUR)	Swedish Krona (SEK)	10.8270

6.2 VAT included or excluded

All ToVs disclosed refer to the NET amount paid, if the recipient of the ToV has charged VAT or taxes but the responsible company is not VAT registered in that location and cannot claim the VAT or taxes the Gross amount has been disclosed, this ensures that actual cost to the MTPG member is accurately disclosed.

6.3 Calculation rules

No specific calculation rules have been applied during this 2025 period, unless stated in section 2.7 Non-Monetary ToVs or Section 6.1 Currency.

If any calculation is done outside of those detailed above this section it will be detailed here.

7 Additional Information

Company Name Change Information

On 1st December 2025 the company underwent a company name change, after this date the company is registered as Tanabe Pharma. The following affiliates and subsidiaries name changes are

- Tanabe Pharma Group (TPG)
- Tanabe Pharma Corporation (TP) based in Japan
- Tanabe Pharma Europe Ltd (TPE) based in United Kingdom
- Tanabe Pharma GmbH (TPD) based in Germany and branches in Vienna, Austria and Zug, Switzerland
- NeuroDerm Ltd (ND) based in Israel
- Tanabe Pharma America Inc (TPA) based in United States

As the ToVs and contracts in 2025 were agreed and took place under the old company name of Mitsubishi Tanabe Pharma this 2025 disclosure is taking place under the old company name. The 2026 disclosure for all ToVs and engagements that take place from 1st January to 31st December 2026 will be made under the new company name of Tanabe Pharma. This name change has already taken effect on the corporate website and so visiting the page that holds the published data will display the new company name but refer to the old company name. This company name change is also noted at the top of each webpage that holds published ToV information.