



UNITED KINGDOM

METHODOLOGICAL NOTE

on disclosure of transfers of value to Healthcare Professionals and Healthcare Organisations

(Information for Reporting of 2018 Data in 2019)

1. Introduction

“Collaboration between pharmaceutical industry and Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs) benefits patients. It is a relationship that has delivered numerous innovative medicines and changed the way many diseases impact on our lives.

Bringing greater transparency to this already well-regulated and vital relationship, builds understanding of HCPs/HCOs collaboration and, in the context of increasing societal expectations on transparency, addresses directly public concerns about interactions between the medical community and the pharmaceutical industry”.

¹ (EFPIA).

Eisai Limited (hereinafter referred to as “Eisai”) is committed to meet those obligations.

This note describes the methods used by Eisai to meet the obligations of disclosing of Transfers of Value (ToV) to Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs), and Healthcare Organisations (HCOs) under EFPIA HCP/HCO Disclosure Code and reflected in the ABPI Code of Practice. This note includes a general summary and any country specific considerations.

2. Definitions

Eisai recognises HCPs, ORDMs, HCOs and ToV according to the EFPIA or national pharma code definitions (where applicable) for the disclosure period.

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 **Other Relevant Decision Makers** 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 are not HCPs.

The term **Healthcare Organisation** means a healthcare, medical or scientific association or organization 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 organization through which one or more HCPs or ORDMs provide services.

3. Scope

3.1 Excluded ToV

Eisai have concluded that certain ToV are not covered by EFPIA and the ABPI Code therefore, has not included them in this disclosure:

Commercial or Promotional ToV:

- Food and drink costs are excluded from Eisai organised and sponsored meetings. However, they may be included if the food and drink was an integral and inseparable part of the contribution to the cost of the event or part of the sponsorship agreement.
- 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 are excluded e.g. room hire, projector rental, audio visual equipment. However, they may be included if provided as part of a sponsorship agreement.

Research & Development ToV:

- Eisai lending laboratory equipment to an HCO as part of a study (where such activity is permitted under applicable local pharma code).

3.2 Aggregated Values

- Where Eisai is not able to obtain HCP/ORDM consent to disclose, the ToV will be included in the aggregated total.
- ToV paid as part of a market research study where Eisai does not know the identity of the participating HCPs or ORDMs will be disclosed on aggregate basis, if available.
- ToV made to a group of HCPs and/or ORDMs, such as group transportation e.g. bus chartering to an event will be disclosed on aggregate basis, if applicable.

3.3 ToV date

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

3.4 Direct ToV

ToV can be made to the HCP, ORDM or HCO directly 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.

3.5 Indirect ToV or Benefit in Kind (BIK)

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

An example of an indirect ToV would be a payment made to an HCO on behalf of an HCP.

An example of a BIK payment would be registration fees paid to a conference provider on behalf of an HCP.

Where a recipient of any ToV made by a third party (on behalf of Eisai) is known to Eisai and consent to disclose has been obtained, any such ToV will be disclosed against the individual HCP/ORDM. In any other circumstances, Eisai will disclose on aggregate basis.

Eisai will make every effort to disclose against individual HCPs or ORDMs where it is known that they have undertaken activities on behalf of an HCO and where the HCO have been paid for this service.

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.

3.6 ToV in case of partial attendances or cancellation

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

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

3.7 Cross-border activities

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

If an HCP/ORDM changes their country of practice then that information will be disclosed for the principal place of operation at the time of disclosure.

4. Specific considerations

4.1 Self-incorporated HCP/ORDM

Our general principle is that where an HCP/ORDM is the sole owner of their own company and Eisai have made a ToV to that company, Eisai will disclose against the individual HCP/ORDM.

4.2 Multi-year agreements

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

5. Consent management

Where an HCP/ORDM's consent has been obtained, Eisai discloses ToV on an individual basis. Where an HCP/ORDM's consent has not been obtained or it has been withdrawn, Eisai discloses ToV on aggregate basis.

Eisai will make every effort to understand an individual HCP's/ORDM's position on consent. If we are unable to ascertain consent we will disclose ToV on aggregate basis.

Eisai is not required to obtain consent from HCOs and will disclose all applicable HCO ToVs.

HCP's/ORDM's may withdraw their consent and should make these requests to the HCP Disclosure Team – please see section 5.2.

5.1 Consent collection

Consent is collected on an event by event basis.

Eisai collect consent on contracts and other supporting documentation for each event/service.

Where consent has not been provided by an HCP/ORDM, Eisai make every effort to make direct contact to ascertain their consent.

Where consent is not obtained, the ToV will be disclosed in aggregate form.

5.2 Management of recipient consent

Requests to change or withdraw consent must be made in writing to the UK HCP Disclosure Team by email to hcpdisclosureteam@eisai.net or by post to:

UK HCP Disclosure Team,
Eisai Limited,
European Knowledge Centre,
Mosquito Way,
Hatfield, AL10 9SN, UK

Where there is a change to consent, Eisai will notify the ABPI.

When consent is withdrawn, the ToV is added to the aggregated value.

5.3 Management of recipient's request

Requests and enquiries must be made in writing to the UK HCP Disclosure Team by email to hcpdisclosureteam@eisai.net or by post to:

UK HCP Disclosure Team,
Eisai Limited,
European Knowledge Centre,
Mosquito Way,
Hatfield, AL10 9SN, UK

5.4 Partial consent

Where only partial consent is obtained for an HCP or ORDM throughout the payment year, Eisai will disclose the total ToV in aggregate form.

Where consent is withdrawn, Eisai will disclose the total ToV in aggregate form.

6. Disclosure Form

Eisai uses a centralised ABPI platform for UK disclosure

7. Financial data

7.1 Currency

Disclosure is made in the local currency. Foreign exchange rates are based on published commercial rates used internally by Eisai.

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

7.2 VAT included or excluded

Commercial or promotional ToV are disclosed using gross values.

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

7.3 Calculation rules

Donations are disclosed using the fair market value (FMV) of the item.

¹

<https://efpia.eu/relationships-codes/efpia-disclosure/>

