



**SPAIN**

# **METHODOLOGICAL NOTE**

## **on disclosure of transfers of value to healthcare professionals and organisations**

(Information is stated as of June 26<sup>th</sup>, 2026)

### **1. Introduction**

“Collaboration between industry and health professionals benefits patients. It is a relationship that has delivered numerous innovative medicines and changed the way many diseases impact on our lives. Industry and health professionals collaborate in a range of activities from clinical research, sharing best clinical practice and exchanging information on how new medicines fit into the patient pathway. Bringing greater transparency to this, already well-regulated, vital relationship is about strengthening the basis for collaboration in the future. Society has increasingly high expectations for transparency, none more so than in healthcare” (European Federation of Pharmaceutical Industries and Associations, EFPIA).

Eisai wants to ensure it meets those expectations.

This note accompanies the disclosure made by Eisai in Spain under Farmaindustria’s Code of Good Practices of the Pharmaceutical Industry on disclosure of Transfers of Value (ToV) from pharmaceutical companies to Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs).

### **2. Definitions**

Eisai recognises HCPs, HCOs and ToV according to Farmaindustria’s code for the disclosure period.



### **3. Disclosure's scope**

Eisai is disclosing in Spain ToV to HCPs and HCOs established in Spain.

#### **3.1 Excluded ToV**

Eisai has concluded that certain ToV are not covered by Farmaindustria's code and, therefore, have not included them in this disclosure:

##### Commercial or Promotional ToV:

- ToV made by another company under a co-promotion agreement with Eisai are disclosed by the other company and not by Eisai.
- ToV paid as part of a market research study where Eisai does not know the identity of the participating HCPs or HCOs.
- Event costs, such as the rental of equipment associated with one-off events e.g. room hire, projector rental, audio visual equipment.
- ToV made to a group of HCPs, such as group transportation e.g. bus chartering to an event.

##### Research & Development ToV:

- Eisai lending laboratory equipment to an HCO as part of a study.

#### **3.2 ToV date**

Eisai discloses the ToV using 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 e.g. payment to an HCP for giving expert advice in an Advisory Board.

Transfers to HCO are always made directly.

#### **3.4 Indirect ToV**

ToV can be made to the HCP indirectly e.g. registration fees paid to a conference provider on behalf of an HCP.



When a third party is used to pay a HCP the information required for disclosure may be provided to Eisai by the third party and uploaded to the disclosure software. Where the ToV (net of agency fee) is known, the value to the individual HCP will be disclosed.

### **3.5 ToV in case of partial attendances or cancellation**

In case of cancellation the ToV is not included in the disclosure.

In case of partial attendance the ToV is included in the disclosure.

### **3.6 Cross-border activities**

Disclosures of ToV are made pursuant to the national code of the country where the HCP 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 changes their country of practice then that information will be disclosed for the principle place of operation at the time of disclosure.

## **4. Specific considerations**

### **4.1 Self-incorporated HCP**

Our general principle is that self-incorporated HCPs are disclosed to HCPs.

### **4.2 Multi-year agreements**

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

### **4.3 Multiple HCO agreements**

We disclose the amount paid to the Eisai ToV vendor set up in our finance system.

## **5. Disclosure of ToV**

Eisai discloses in Spain ToV on an individual basis.

Requests must be made in writing to writing to ES-Disclosure@eisai.net or Eisai Farmacéutica, S.A., Parque Empresarial Cristalía, Edificio 7/8, Pta. 4ª; C/ Vía de los Poblados, 3, 28033 Madrid.



## **6. Disclosure Form**

Eisai shall publish ToV in Spain on the website of the company in Spain ([www.eisai.es](http://www.eisai.es)) using Farmaindustria's disclosure template.

## **7. Disclosure financial data**

### **7.1 Currencies**

Disclosures in Spain are made in Euro. Foreign exchange rates are based on published commercial rates used internally by Eisai. Exchange rates applied to commercial or promotional TOV are based on an average rate for the disclosure period.

### **7.2 VAT excluded**

ToV are disclosed in Spain using gross values excluding VAT or other taxes at the applicable rate.

### **7.3 Calculation rules**

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