

Otsuka Pharma Scandinavia AB

EFPIA disclosure: Finland

Methodology note applicable to transfers of value, for the
reporting year: 2024

1. Introduction

The aim of this Methodology Note is to provide definitions and explanations and of how Otsuka Pharma Scandinavia AB documents and publishes any Transfer of Value (ToV) to any healthcare professionals (HCPs) or healthcare organisations (HCOs) for the current reporting year in accordance with the requirements of the Pharma Industry Finland's (PIF) Code of Ethics and EFPIA Code of Practice.

Any questions relating to this Methodology Note and / or the disclosure report should be directed to: info@otsuka.se

2. Definitions

2.1. Recipients – Healthcare Professional (HCP)

Otsuka Pharma Scandinavia AB has adopted the definition as per the PIF Code of Ethics.

Exclusions:

- 2.1.1. Non-practicing HCPs,, including retired HCPs (excluding HCPs conducting research or teaching) and therefore do not prescribe, purchase, supply, recommend, or administer a medicinal product, and who may be engaged to provide consulting services to Otsuka Pharma Scandinavia AB
- 2.1.2. Employees of Otsuka Pharma Scandinavia AB who are still members of the said professions and able to prescribe are deemed excluded.
- 2.1.3. Employees of Otsuka Pharma Scandinavia AB collaboration partners who are still members of the said professions and able to prescribe are deemed excluded.

2.2. Recipients – Healthcare Organisation (HCO)

Otsuka Pharma Scandinavia AB has adopted the definition as per the PIF code of Ethics.

2.3. Kind of ToV

Expense Category	Description
HCO Medical Educational Grant & Donation	Donation and grant (e.g. medical educational books and brochures, scholarship) to HCO, which enhance patient care, or benefit the healthcare system and maintain patient care. Donations and grants – either in cash or kind – that support healthcare are included.
HCP/HCO Registration Fee	Fee paid to allow an HCP or member of an HCO to attend a congress, course, educational event.
HCP/ HCO Travel & Accommodation	Examples: flight, train, taxi, hotel. Meals are excluded, except where breakfast is included in the hotel room rate amount)
HCO Sponsorship	All expenses agreed with an HCO (e.g. booth hire, advertisement space, space for satellite symposia, and contribution towards the cost of meetings).
HCP/ HCO Fee for Service	Compensation provided for any kind of services provided by an HCP or member of an HCO (e.g. speaker fee, consultant fee, compensation for market research when the identity of the HCP is clear, speaker training, medical writing and data analysis). In addition to fee for services in relation to consultancy services, Otsuka Pharma Scandinavia AB will disclose under this category any ToV relating to retrospective non interventional studies sponsored by investigator (e.g. Investigator Sponsored Studies (ISS)). It should be noted that this will increase the total annual amount disclosed against this category for certain recipients.

HCP/HCO agreement related expenses	Travel and accommodation or any other expense as per the fee-for-services agreement (e.g. taxi, mileage or out of pocket expense).
R&D related expenses	Expenses related to the planning and conduct of an Otsuka sponsored study. Refer to section 4.6 for further explanation.

3. Disclosure's scope

3.1. Products concerned

Otsuka Pharma Scandinavia AB has adopted the definition as per the EFPIA Code of Practice, with the additional clarification:

- 3.1.1. Medicinal Product will include products for which application for a marketing authorisation to the EMA or any National Competent Authority in Europe is made.
- 3.1.2. ToV relating to any activity in respect of a new molecule/compound that are commercial in nature and not directly related to Research and Development (R&D) activity, will be disclosed as individual ToV.
- 3.1.3. Medical Devices are not included.
- 3.1.4. Combination products are included.

3.2. Company concerned (affiliate – merger)

In Europe, Otsuka Pharmaceutical Europe Ltd – and its subsidiary affiliates (including Otsuka Pharma Scandinavia AB) – provides governance, oversight, and compliance monitoring for interactions between Otsuka Group companies and European recipients. Throughout this methodological note, Otsuka Pharma Scandinavia AB represents the presence and interactions of Otsuka Group companies and affiliates within Europe.

Collaboration Partners – principle: each partner company will disclose ToVs made by that entity to HCPs/ HCOs, irrespective of reimbursement. However, each country has defined the process applicable to jointly sponsored event. Any ToVs made by Otsuka Pharma Scandinavia AB partners in respect of a product not licenced or commercialised in Europe will not be disclosed. Exclusive Distributors of Otsuka Europe Medicinal Products are responsible for disclosing ToVs in accordance with their own compliance requirements.

3.3. Excluded ToV

Civil or criminal action or administrative proceeding: In the case of an HCP who received a ToV solely for services with respect to a civil or criminal action or an administrative proceeding, such ToVs are excluded from disclosure. These proceedings include:

- Legal defence,
- Prosecution, and

- Settlement or judgment of a civil or criminal action and arbitration or other legal action.

4. Transfers of Value (ToV)

4.1. Direct ToV

Direct ToV will be disclosed in the ToV period which the payment is made, irrespective of the contract date, contract duration or event date.

Example: for an event which took place at the end of the year, it is possible that part of the ToV's for that event are invoiced in the two different years.

Payments will be disclosed in the year the invoice is paid.

4.2. Indirect ToV

Indirect ToV will be disclosed based on the payment date provided to Otsuka Pharma Scandinavia AB by the intermediary. In the event that the payment date is not provided by the intermediary, then the event date is used.

In the event that we become aware that ToV granted by us to a third party have been passed on to healthcare professionals, or those persons have benefitted from such, we will generally publish the details of each of those ToV under the name of the relevant healthcare professional. Our contractual arrangements with third parties include the data protection provision that third parties require the consent of their own contracting partner for the publication of details relating to ToV and must demonstrate such to us.

4.3. Non-Monetary ToVs

Otsuka Pharma Scandinavia AB does not carry out Non-monetary ToVs for HCPs or HCOs.

4.4. ToV in case of partial attendances or cancellation and refund

Participant attendance at sponsored events and “no-shows”:

- If Otsuka Pharma Scandinavia AB sponsors an HCP/HCO to attend an event and the relevant HCP does not attend, a ToV will not be disclosed for that HCP.

4.5. Cross-border activities

Otsuka group companies in scope for providing ToV data for EFPIA reporting are all Otsuka group companies (incorporated in any jurisdiction) that:

- develop or commercialise Medicinal Products (as defined);
- are controlled (i.e. more than 50% ownership) by Otsuka Pharmaceutical Co., Ltd., (“OPC”); Otsuka America Inc. (“OAI”); Otsuka Pharmaceutical Europe Ltd. (“OPEL”) and any subsidiary of these three companies; and

- engage (provide ToVs to) HCPs resident or practicing in any of the European Member State (hereafter referred to as “Otsuka Group Companies”)

A cross-border situation exists when the ToV is paid by an Otsuka Group Company incorporated in a country other than the country in which the healthcare professional or organisation is based, has their practice or main office. This sort of situation includes those cases where a subsidiary of the Otsuka Group Companies based outside Finland, concludes an agreement with an HCP or HCO, that are resident or practicing in Finland.

Otsuka Pharma Scandinavia AB will disclose all ToVs made to Finnish HCPs for engagements by any Otsuka Group Companies. In these cases, disclosure will be made in accordance with the EFPIA Code of Practice.

4.6. R&D

Research and Development (R&D) – Otsuka Pharma Scandinavia AB has adopted the definition as per the EFPIA Code of Practice with the additional clarifications:

- Otsuka Pharma Scandinavia AB will disclose under this category any ToV relating to prospective non interventional studies sponsored by investigator (E.g. Investigator Sponsored Studies (ISS)), as they are prospective in nature and involve the collection of patient data from or on behalf of individual, or groups of HCPs specifically for the study.
- Otsuka Pharma Scandinavia AB’s support, direct or indirect, to medical publication in connection to R&D activities, will be disclosed under this category.

It should be noted that this will increase the total annual amount disclosed against this category.

4.7. Voluntary Disclosure

Pharma Scandinavia AB does not carry out Voluntary Disclosure. All activities that are conducted are within the scope of the national Code.

5. Specific considerations

5.1. Country unique identifier

Where required according to the market code, a country unique identifier will be included for each recipient. If the country unique identifier is not available, an internal Otsuka unique identifier will be used.

Where there are no specific requirements for inclusion of a unique country identifier (but there is a location available on the report template) – or the inclusion is optional – then the most appropriate unique identifier will be used, primarily country unique identifier, or (secondarily) internal Otsuka unique identifier.

5.2. Self-incorporated HCP

A self-incorporated HCP is a one-person company, owned by an HCP. Disclosure will be made against the invoicing entity/payee – i.e.

Where ToV are invoiced by the company, and/or the payee bank account is in the company name, the ToV will be treated as a direct payment to an HCO.

Where ToV are invoiced by the HCP, and/or the payee bank account is in the HCP name, the ToV will be treated as an indirect payment to an HCP.

In both cases, consent management will be applicable as for the final recipient type (HCP or HCO). Where local requirements necessitate a different approach – such as mandating disclosure against the HCP, irrespective of the invoicing entity/payee – those local requirements will be followed.

6. Multi-year agreements

ToV associated with multi-year agreements will be reported as each payment is made.

7. Country Specificities

There are no country specificities for Finland.

8. Data protection legal basis

8.1. Consent collection

Everyone is entitled by law to protection of data relating to them. This basic right covers the recording, processing and dissemination of any personal information, whereby any of these shall require the specific consent of the person affected.

There are strict requirements for any such consent – it must be explicit, it needs to be visually highlighted in any contractual texts or similar documents and must be clearly and transparently worded.

8.2. Management of recipient consent withdrawal

Any recipient wishing to withdraw consent to disclose ToV, must contact the Otsuka EU Transparency & Disclosure team directly, at transparency@otsuka-europe.com

Received disclosure consent withdrawals will be processed – and the affected report(s) updated – as soon as is reasonably practicable. Throughout the processing, the recipient will be kept informed of the target timelines for completion of the request.

8.3. Management of recipient's request

Otsuka Pharma Scandinavia AB requires all healthcare professionals to provide their consent to us before publishing details of any ToV they receive from us on an individual named basis. The consents will:

- apply for all engagements of Finnish HCPs by any Otsuka Group Company; and
- be unlimited in time unless and until revoked in writing by the HCP.

In the event that responses to consents have not been received from the HCPs, despite best efforts, ToV will be reported in aggregate. Consents for HCOs are not being requested, save where required by law in which case consents will be included in the written agreement with the HCO.

8.4. Partial consent

This situation may arise, for instance, where the healthcare professional agrees to the publication of details of having received funding to attend a professional congress or seminar but does not agree to the publication of the travel and accommodation costs associated with the trip. Another potential example is where the person concerned agrees to the publication of the expenses paid in connection with attending such an event, but not to the publication of any associated consultancy fee.

If consent to disclose is revoked for any individual engagement, all engagements (past and future) of that HCP will be disclosed in aggregate. However, in the event that a request for revocation is received either after data has been processed for disclosure (generally thirty (30) days prior to a disclosure date) or after actual disclosure, the revocation will be reflected after 30 days in a updated report and consent change will apply as well to any future engagements, as far as it is within the control of Otsuka Pharma Scandinavia AB to update the report.

8.5. Legitimate interest

Currently, Otsuka Group are not using Legitimate Interest as a basis for disclosure. Disclosure consent remains the basis for named disclosure of ToV to HCPs.

9. Disclosure Form

9.1. Date of publication

The Otsuka Pharma Scandinavia AB disclosure report will be published within 6 months of the end of each calendar year, and will remain publicly available for a period of 3 years. The Otsuka Pharma Scandinavia AB disclosure report will have the report version date clearly stated on the report.

9.2. Disclosure platform

The Otsuka Pharma Scandinavia AB disclosure report will be published on the Transparency Finland web page: <https://www.otsuka.se/fi-hcp-disclosure-information>.

10. Disclosure language

The Otsuka Pharma Scandinavia AB disclosure report will be published in English and Finnish.

11. Disclosure financial data

11.1. Currency (local or if not, specify the exchange rate)

Otsuka Pharma Scandinavia AB reports all ToV in the base currency of the local office in the reporting country. Any amounts where the ToV has been in a foreign currency will be converted using the rate of the payment date. In some cases, the exchange rate used for converting the foreign currency amount into the reporting currency amount will be different to the rate used during the payment transfer. This is largely determined by the nature of the ToV and Otsuka Pharma Scandinavia AB expects the differences to be relatively insignificant.

11.2. VAT included or excluded

For the most part, Otsuka Pharma Scandinavia AB will publish payments wherever possible as gross amounts, i.e. including VAT. As multiple VAT regimes exist globally with different reimbursement approaches some payments may be reported as net amount excluding VAT.

12. Calculation rules

For calculations associated with currency conversions, see section 11.1

Where one ToV payment is covering multiple recipients, that payment amount will be divided equally across all attending recipients, and those divided amounts included in the individual recipient totals.

Where possible, ToV amounts will be reported to 2 decimal places (0.00), with any division of amounts leading to greater than 2 decimal places accuracy, being rounded down.

13. Additional information

13.1. Sources of Data

Data will be captured through a number of platforms:

- Internal Otsuka Database – the bespoke Otsuka Group platform for reference data and document management.
- ERP system (SAP) and Otsuka's salary system where direct payments to HCP/HCO are managed.
- Third Party systems – ad hoc payments made by intermediaries who cannot access Internal database. These ToVs are captured via a manual spreadsheet template which is manually uploaded to the Transparency Reporting System.

13.2. Data Quality

Otsuka Pharma Scandinavia AB is confident that the data included in the disclosure report is to the best of our knowledge complete and accurate account of the ToVs made by or on behalf of Otsuka Pharma Scandinavia AB to HCP/HCOs located in Finland for the current reporting period.