



METHODOLOGICAL NOTE – 2025

Accompanying document for the public disclosure
concerning transfers of value to Patient
Organizations in regards to guidelines in line with
EFPIA/
INFARMA Code of Good Practice

Takeda Pharma LTD
Data napisania: 29/06/2026

METHODOLOGICAL NOTE 2025

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1. Introduction

Cooperation between the pharmaceutical industry and Patient Organizations (POs) primarily benefits patients. This collaboration has contributed to the development of innovative medicines and has significantly changed the impact of many diseases on patients' lives. Increasing transparency in these already well-regulated relationships is essential to maintaining trust and establishing a sustainable framework for future collaboration.

Takeda Pharma LTD as a member of the European Federation of Pharmaceutical Industries and Associations (EFPIA) and an associated company of INFARMA, is committed to ensuring transparency in its interactions with Patient Organizations in line with applicable EFPIA/INFARMA requirements.

This Methodological Note describes the principles applied by Takeda Pharma in the preparation and publication of its Disclosure Report, including the definitions and assumptions related to the disclosure of Transfers of Value (ToV) to Patient Organizations.

2. Scope of Disclosure

This section outlines the interpretation of applicable EFPIA requirements, including the definition of recipients, reportable Transfers of Value, and categories of disclosed activities.

2.1 Interactions with Patient Organizations (POs)

2.1.1. Definition of Patient Organization (PO)

A Patient Organization (PO) is a non-profit legal entity (including umbrella organizations) mainly composed of patients and/or caregivers, representing and/or supporting their needs, and with a registered address or principal place of business within an EFPIA country.

A PO Representative is an individual authorized to represent and express the collective views of a Patient Organization in relation to a specific disease area or topic.

2.1.2. Time of Disclosure

The reporting period covers the full previous calendar year, i.e., 2025.

Publication of the Disclosure Report takes place annually, typically between 20 and 30 June of the following year, unless otherwise specified by applicable national requirements.

2.2 Types of Transfers of Value (ToV)

Transfers of Value disclosed may include:

- Direct Transfers of Value: made directly to a Patient Organization
- Indirect Transfers of Value: made via a third party acting on behalf of Takeda
- In-kind Transfers of Value: non-monetary support provided to a Patient Organization

As a general rule, Transfers of Value are disclosed at the level of the first identifiable recipient qualifying as a Patient Organization.

Transfers of Value to individual patients who do not represent or act on behalf of a Patient Organization are excluded from disclosure (e.g. market research participation, development of educational materials).

2.3 Activities within the scope of disclosure for Patient Organisations

All interactions with Patient Organizations are conducted in accordance with internal policies and procedures aligned with EFPIA/INFARMA standards, applicable laws, and local requirements.

Types of Support or Services Provided:

I. Financial Support.

II. Significant Indirect Support: This is support provided to a Patient Organization through a third party.

III. Non-Financial Support: When Takeda Pharma provides a service to a Patient Organization without any direct or indirect financial flow. For example, Takeda Pharma provides a conference room in its office for a Patient Organization meeting. In such a case, although the service is free of charge, a monetary value may be demonstrated and must be disclosed.

IV. Contracted Services.

2.3.1. Donations and Grants

All Donations and Grants provided to Patient Organizations are disclosed. These may include:

- Financial donations
- In-kind support
- Charitable contributions (where the recipient qualifies as a Patient Organization)

Such support must not constitute an inducement to recommend, prescribe, purchase, supply, sell, or administer any medicinal product.

Donations or Grants to individual persons are prohibited.

2.3.2. Contribution to event costs

All Transfers of Value related to Event-related Costs are disclosed as significant indirect support, when applicable. These may include:

- Travel expenses (e.g. flights, rail, taxis, car rental, tolls, visas, insurance)
- Accommodation expenses
- Registration fees for third-party events
- Sponsorship agreements enabling participation in congresses, conferences, or other events

2.3.3. Fees for Service and Consultancy

Transfers of Value related to Fees for Service and Consultancy are disclosed as contracted services. These include:

- Fees for services (e.g. preparation time, participation time, travel time)
- Related expenses (e.g. travel and accommodation)

All such engagements must be governed by a written agreement specifying the nature of the services, the basis for compensation, and the obligation for disclosure.

2.4 Cross-border value transfer

Cross-border Transfers of Value occur when support is provided across different countries.

Such Transfers of Value are disclosed in the country where the Patient Organization has its principal place of business.

3. Assumptions

3.1. Date of Transfer of Value

The date of Transfer of Value is defined as the date on which the payment is made.

Transfers of Value are included in the Disclosure Report corresponding to the calendar year in which the payment was executed.

3.2. Currency

All disclosed amounts are reported in local currency (PLN).

Where Transfers of Value are made in a foreign currency, amounts are converted using exchange rates applied by Takeda.

3.3. Taxes

In general for transfers of value, Takeda excludes tax and VAT for monetary payments.

4. Conflict Management and Contact



Takeda has implemented an internal process to manage inquiries, discrepancies, and requests related to its Disclosure Report and published data.

For any questions regarding this Methodological Note, the Disclosure Report, or the processing of personal data, please contact: privacyoffice@takeda.com

Alternatively, please refer to the contact details available on the local Takeda website.