

Otsuka Pharmaceutical S.A.

Farmaindustria disclosure: SPAIN

Methodology note applicable to PO transfers of value, for the reporting year: 2025 (published June 2026)

1. Introduction

The aim of this guidance is to provide a clear and simple explanation of how Otsuka Pharmaceutical S.A. intends to record and publish this information in accordance with the [Farmaindustria Code of Practice](#).

Any questions relating to this Methodology Note and / or the report should be directed to: transparencyopsa@otsuka.es.

2. Definitions:

Otsuka Spain has adopted the definition as per the [Farmaindustria Code of Practice](#).

2.1. Recipients

Patient Organisation (PO): non-for-profit legal person/entity (including the umbrella organisation to which it belongs), mainly composed of patients and/or caregivers, that represent and/or supports the needs of patients and/or caregivers and which business address, place of incorporation or primary place of operation is in Europe.

2.2. Kind of ToV (Transfer of Value)

Otsuka Pharmaceutical S.A. will include in the transparency report direct or indirect Transfers of Value related to collaborations, sponsorships, donations and provision of services carried out in favour of such entities, regardless of the Otsuka Group entity that has performed the corresponding Transfer of Value.

In this context, contributions related to travel and accommodation of patients or patient representatives may also be reported when their participation is linked to events organized or sponsored by the company.

Each concept is detailed below:

Transfers of Value (ToV): Direct or indirect Transfers of Value, whether in cash, in kind or otherwise, regardless of its purpose. **Direct:** Transfers of Value are those made directly by a pharmaceutical company for the benefit of a recipient. **Indirect:** Transfers of Value are those made by third party (provider, agent, partner or affiliate – including foundations) acting on behalf of a company for the benefit of a Recipient when the company knows or can identify such Recipient.

Transfers of Value made as part of commercial transactions between pharmaceutical companies and distributors; pharmacy offices and Healthcare Organizations are excluded from this concept.

Donations and Grants: An act of generosity through which a company (donor) makes an amount of money, goods or services (donation in kind) freely available to a third party (donee), which accepts it. At times, grants (finalist donations) is the name for those cases in which the money, goods or services are intended for the fulfilment of a given objective, the execution of a project or the completion of an activity by the donee. In all cases, the donor will not receive or request any compensation from the donee (regulated by article 15 of the Code).

Fees for services: Remuneration for any type of service provided by a patient or a representative of a PO (for example, speaker fees, consultancy, compensation for market research where the identity of the HCP is known; speaker training, medical writing and data analysis). In this regard, all engagements will be channeled through a PO with tax residence in Spain

Collaborations: Contribution to joint work with POs to develop initiatives that improve patient care, benefit patients or the Spanish National Health System (SNS), and maintain quality of care. Joint work constitutes a limited form of collaborative work.

Sponsorships: All expenses agreed with a PO for the organization of an event or a non-promotional activity (for example, contributions to meeting costs).

3. Disclosure's Scope:

Otsuka Spain will disclose all ToVs made to patient organizations in Spain as well as those initiated by any of the Otsuka Group Companies. In these cases, the disclosure will be made in accordance with the Farmaindustria Code of Good Practices.

3.1. Products concerned

Collaborations with POs are directly linked to the therapeutic areas of the company's products.

3.2. Company Concerned (affiliate -merger)

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

Collaboration Partners – principle: each partner company (refers to an external company that collaborates with the organization under a professional or contractual relationship) 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.

Exclusive Distributors of Otsuka Europe Medicinal Products are responsible for disclosing ToVs in accordance with their own compliance requirements.

3.3. Excluded ToV

NA

3.4. ToV dates

The report on Transfers of Value published on the Company's website, as well as on the official Farmaindustria website, includes all payments made to HCP and HCOs within the relevant transparency reporting cycle, including data from 1 January to 31 December of the year preceding the publication of the report.

3.5. Direct ToV

Direct ToV will be disclosed in the ToV period in which the payment is made irrespective of the contract date, contract duration or event date. ToV associated with multi-year agreements will be reported as each payment is made, for further information, please refer to Section 4.3

3.6. Indirect ToV

Indirect ToV will be disclosed based on the payment date provided to Otsuka Pharmaceutical S.A. (Spain) 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 has 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 data protection provision that third parties are informing the HCP about OPSA disclosure obligations relating to ToV and must demonstrate such to us ToV in case of partial attendances or cancellation

3.7. Non-monetary ToV (in kind)

In accordance with applicable internal company policies, this type of ToV is not permitted for PO.

ToV Transfers of Value arising from situations such as partial attendance, cancellation and reimbursement

3.8. This scenario only applies to ToVs related to travel and/or accommodation processed through POs and related to events organized and/or sponsored by the company.

- If Otsuka Pharmaceutical S.A. (Spain) sponsors a patient through a Spanish PO to attend an event organized or sponsored by the company and the corresponding patient does not attend, a ToV will be disclosed for that PO, unless Otsuka has been able to cancel it and obtain reimbursement.

- If Otsuka Pharmaceutical S.A. (Spain) sponsors a patient through a Spanish PO to attend an event organized or sponsored by the company which has been cancelled or postponed due to a pandemic situation and/or any other force majeure scenario, and the corresponding patient does not attend, such ToV will not be subject to disclosure for that PO.

3.9. Cross-border activities

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

- develop or commercialize 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 for an Otsuka Group Company incorporated in a country other than the country in which the healthcare professional or organization 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 Spain concludes an agreement with an HCP or HCO, that are resident or practicing in Spain.

Otsuka Pharmaceutical S.A. will disclose all ToV’s made to Spanish HCPs for engagements by any Otsuka Group Companies. In these cases, disclosure will be made in accordance with the Farmaindustria Code of Practice.

3.10. R&D

NA

3.11. Voluntarily disclosed ToV

Although the local Code of Good Practices does not apply, Otsuka Pharmaceutical S.A. voluntarily commits to the disclosure of all Transfers of Value related to activities linked to therapeutic areas associated with medical devices.

4. Specific considerations

4.1. 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.

4.2. Self-incorporated HCP

NA

4.3. Contracts with a duration exceeding one year

In cases where an agreement with a PO extends beyond one year, ToV is disclosed in the reporting period corresponding to the relevant reporting date (i.e. the payment date), regardless of the duration of the agreement.

4.4. Country-specific considerations

All ToVs directed to patients, family members, caregivers or representatives of POs by Otsuka Pharmaceutical S.A. (Spain) or by Otsuka Group companies must be channeled exclusively through a PO. Under no circumstances may they be made directly and individually to patients, family members, caregivers or representatives of a PO.

Exceptionally, and only when it is necessary to manage accommodation and/or travel for attendance at an event organized or sponsored by the company, these arrangements may be made directly through the travel agencies contracted by the company.

4.5. Data Quality

Otsuka Pharmaceutical S.A. (Spain) 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 Pharmaceutical S.A. to HCP/HCOs located in the Spain including all data paid during the January 1st and until December 31st for the current disclosure cycle.

In the case of receiving ToV that must be included in the current report after the deadline for the review of the data to be published, or once the report has already been published, whenever possible the published report will be updated including the additional ToV. When it is not possible to update the report, these ToV will be included in the next transparency report corresponding to the next Publication Period.

5. Data protection management

In this regard, all Transfers of Value (ToVs) will be disclosed under the name of the corresponding Patient Organization (PO).

However, in duly justified exceptional cases, such as those related to rare diseases in which there is no PO through which the ToV directed to patients, family members, caregivers or representatives of POs can be channeled, specific provisions in accordance with applicable regulations may apply.

Every individual has the right, in accordance with the law, to the protection of their personal data. This fundamental right covers the collection, processing and disclosure of any personal information.

Any person wishing to exercise at any time their rights of access, information, rectification, erasure, objection, restriction of processing or portability regarding the published data should contact: transparencyopsa@otsuka.es. Alternatively, they may contact OPSA's Data Protection Officer (DPO) via the following email address: gdpr@otsuka.es.

5.1. Consent collection

NA

5.2. Partial consent

NA

5.3. Legitimate interest

ToVs made to POs are based on the legitimate interest of Otsuka Pharmaceutical S.A. (Spain) in ensuring transparency in its interactions with such POs and in compliance with the Farmaindustria Code of Good Practices and applicable regulations.

6. Disclosure Form

6.1. Date of publication

The Otsuka Pharmaceutical S.A (Spain) 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.

6.2. Disclosure platform

Details of the transparency report that includes collaborations with Spanish HCP/HCO can be found on the Otsuka Pharmaceutical S.A. website, the following link [Otsuka Pharmaceutical S.A. OP Disclosure](#), as well as at the following link on the Farmaindustria website: <https://www.codigofarmaindustria.org/servlet/sarfi/colaboracionesps.html>

6.3. Disclosure language

The Otsuka Pharmaceutical S.A. disclosure report will be published in English and Spanish.

7. Disclosure financial data

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

Otsuka Pharmaceutical S.A. (Spain) all ToV in the base currency of the local office in the reporting country. Any amount 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 Pharmaceutical S.A. expects the differences to be relatively insignificant.

7.2. VAT included or excluded

For the most part, Otsuka Pharmaceutical S.A. will publish payments wherever possible without including VAT. As multiple VAT regimes exist globally with different reimbursement approaches some payments may be reported as net amount including VAT.

7.3. Calculation rules

For calculations associated with currency conversions, see section 9.1.

Where one ToV payment covers 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 of accuracy, being rounded down.

Example: a ToV payment of 31Eur is attributed to 3 attending recipients. The division of the ToV amount equates to 10.3333 Eur each. This will be reported as 10.33 Eur, per recipient.

8. Additional information

8.1. Sources of Data

Data will be captured through a number of platforms:

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

8.2. Management of recipient's request

Anyone who disagrees with any data that has been published, who has any questions about the information published, or who wants to see the details or wants more information about any data published should contact transparencyopsa@otsuka.es.