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## TRANSPARENCY METHODOLOGY NOTES

REPORTING YEAR 2024

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#### 1.0 General principals and purpose

Our Vision is to transform the biotechnology industry, creating impactful medicines that will be affordable and accessible to more cancer patients worldwide.

At BeiGene, we uphold the highest standards of transparency. In strict accordance with Applicable Laws, internal codes, and Regulations, we are required to disclose all payments or transfers of value to Healthcare Professionals (HCPs) and/or Healthcare Organizations (HCOs) and Patient Organizations.

To establish adequate procedures for ensuring compliance with the Applicable local Codes, BeiGene and 3rd Parties acting on behalf of BeiGene established a process and internal procedures to collect any transfer of value made directly or indirectly to any individual or organization connected with the based on the local pharma association and their local codes.

#### 2.0 DEFINITIONS

Below are some work assumptions and definitions of recipients and expenses that are in scope:

##### 2.1. Recipients

###### **Healthcare Organization (HCO):**

any legal person/entity that is a healthcare, medical or scientific association or organization (irrespective of the legal or organizational form) 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 through which one or more HCPs provide services.

###### **Healthcare Professional (HCP):**

any natural person that is a member of the medical, dental, pharmacy or nursing professions or any other person who, during his/her professional activities, may prescribe, purchase, supply, recommend or administer a Medicinal Product and whose primary practice, principal professional address or place of incorporation is in Europe, specifically in our country.

###### **Patient Organization (PATORG)**

“Not-for-profit organizations (including the organizations to which they are affiliated) based or active in our country, which consist primarily of patients or their carer and which represent or support the needs of patients or their carer. This definition also includes persons who represent and/or formulate the collective concerns and interests of a patient organization about a specific topic or a specific pathology.”

#### METHODOLOGY NOTE

#### TRANSPARENCY PROCESS REPORT REQUIREMENTS.



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#### **Third party and PCO (Partners in Congress Organization)**

Third parties are entities or individuals that represent our company in the marketplace or interact with other third parties on behalf of our company or relating to our company's product. Among others, these thirds parties can be distributors, travel agents, consultants, contract research organizations.

#### **2.2. Expense type**

##### **Donations and Grants to HCO's**

This category provides support to only to healthcare organizations, institutions, or associations.

Events include all scientific professional meetings, congresses, conferences, symposia and other similar events.

##### **Sponsorships**

This category provides financial support to HCOs/third party appointed by an HCO to manage an Event (for example, PCO).

This category could also contain payments related to a Congress or Symposia paid to an HCO on behalf of an entity disclosed on an individual basis (in the name of the HCO).

Examples:

- Rental of booth space at an event
- Advertisement space
- Satellite symposia at a Congress
- Sponsoring of speakers/faculty

##### **Registrations fees**

This category always related to an HCP attending a Congress or Symposia.

##### **Travel & Accommodation expenses**

This category related to attending a Congress or Symposia.

Example:

- Fees for airfare, train, boat or ferry (incl. booking fees)
- Car rental, car services, taxi transfers
- Parking fees
- Gas/Petrol costs
- Road tolls or fees
- Hotel Lodging

##### **Fee for service**

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TOVs resulting from or related to contracts between Beigene and institutions, organisations, associations or HCPs under which such institutions, organisation, association or HCPs provide any type of services to Beigene, or any other type of funding not covered in the previous categories.

TOVs related to R&D related activities but when they do not follow within the definition of R&D TOVs (transfer of values) as defined by EFPIA are disclosed under this category.

Examples include:

- Speaker fees
- Speaker training

#### **Research & Development:**

This category related to R&D TOVs to HCPs/HCOs associated with:

- Non-clinical (Good Laboratory Practice (GLP))
- Clinical trials in Phase I to Phase IV (Interventional and Non-Interventional Prospective)
- Investigator initiated and sponsored Studies
- Collaborative initiated Research studies

### **3.0 DATE METHODOLOGY**

Beigene followed the date methodology when determining which TOVs are in scope for current reporting cycle:

#### **Event date:**

Related to the date that the expense occurred under the following categories:

- Contribution to cost of events: Registration fee
- Contribution to cost of events: Travel & Accommodation

#### **Payment date:**

Related to the date that the payment was provided to the covered recipient under following categories:

- Fee for services and consultancy: fees
- Sponsorships
- Grant & Donation
- Research & Development

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#### 4.0 DISCLOSED VALUES

##### 4.1. Tax and VAT

In general, Beigene excludes Tax and VAT for Monetary payments/transfers of value (TOVs), because of external data providers, could be possible some Transactions having the VAT included. VAT is excluded for all R&D TOVs.(Transfer of values)

##### 4.2. Disclosure currency

All payments and TOVs will be disclosed in local currency in EUR. If a payment is captured in another currency, it will be converted into local country currency based on the date at which the TOV occurred and corresponding daily exchange rate.

##### 4.3. Cancellation of events or when an HCP does not participate.

In the circumstances when a flight or accommodation is booked but the event is cancelled or HCP does not attend, no TOV will be attributed to that HCP or HCO.

##### 4.4. Transfer of Values (TOVs)

Direct and indirect transfers of value, whether in cash (Monetary), In Kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of generic or branded prescription-only Medicinal Products exclusively for human use.

- **Direct transfers of value** - are those made directly by Beigene to, and for the benefit of an HCP/HCO/Third Party Intermediary (where identity of HCP/HCO cannot be identified) Recipient.

- **Indirect transfers of value** - are those made through an intermediary (Third Party/PCO) on behalf of Beigene for the benefit of an HCP/HCO Recipient, where the identity of Beigene is known to or can be identified by the Recipient and where Beigene can identify the HCP/HCO that benefits from the TOV. (For example, single-blinded or double-blinded market research are excluded).

Examples:

- In Kind –Lodging, Transportation, Registration Fees
- Monetary – Grant, Sponsorship, Donation, Research and Fee for Service payments



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#### 5.0 DISCLOSURE OF CROSS BORDER TRANSACTIONS

Beigene will disclose based on the principal practice address of the recipient, regardless of where payment is made. Beigene relies on IQVIA Data Base as a recognized industry leader in data management to determine the principal practice address of the Healthcare Professional (HCP) and Healthcare Organisation (HCO) to be consistent across the EFPIA countries. This may not match the address collected on the contract, our finance payment system, or other supporting documentation. Beigene will disclose based on the principal practice address of the recipient, regardless of where payment is made.

#### 6.0 CONSENT MANAGEMENT

Beigene is collecting consent for individual disclosures digitally using the ONETRUST link, which has been sent together with the contract to our business partner for an HCP (and HCOs where applicable) based on local requirements is engaged or have an interaction; the contract partner will submit the consent link and get a confirmation of his decision.

To avoid the “cherry picking” of transactions for individual disclosure:

- If different consent is given for the engagements by an HCP, Beigene will disclose TOVs based on the latest decision of the HCP.

In case HCP revoking of individual consent:

If an HCP revokes consent before the data is published, Beigene will update the data and include the TOVs in the aggregate section of the applicable Disclosure report.

- If an HCP revokes consent after publication of the data, Beigene will update the information retrospectively or prospectively based on local requirements at the first reasonable time.

#### 7.0 TIMING OF DISCLOSURE

Beigene will publish the data for the prior period on or before June 30, following the local association's instructions.

#### 8.0 PUBLIC DISCLOSURE AND RETENTION PERIOD

Per the FSA's guidance, Beigene will ensure that the Disclosed reports remain in the public domain for three years.

The documentation related to the reported activities will remain in our archives, documented, and retained for five years.

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**9.0 GLOSSARY OF TERMS**

TERM	DEFINITION
HCP	Healthcare professional
HCO	Healthcare Organization
FSA	Freiwillige Selbstkontrolle für die Arzneimittelindustrie e. V.
TOV	Transfer of Value
R & D	Research & Development
PCO	Partners in Congress organization

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