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**TRANSPARENCY METHODOLOGY NOTES**  
**REPORTING YEAR 2025**

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**TABLE OF CONTENTS**

TABLE OF CONTENTS.....	1
1.0 General principles and purpose .....	2
2.0 Definitions .....	2
3.0 Date Methodology .....	5
4.0 Disclosed values .....	6
5.0 Disclosure of cross border transactions .....	7
6.0 Consent Management.....	8
7.0 Timing of Disclosure.....	8
8.0 Public disclosure and retention period .....	9
9.0 GLOSSARY OF TERMS .....	9



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## TRANSPARENCY METHODOLOGY NOTES

### REPORTING YEAR 2025

---

#### 1.0 General principles 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 BeOne, 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 ensure compliance with the applicable local codes, BeOne and the third parties acting on its behalf have established processes and internal procedures to capture every transfer of value made, directly or indirectly, to any individual or organization within the scope of the applicable local pharmaceutical association and its transparency code.

In Luxembourg, BeOne Medicines operations through the BeOne Medicines Belgium SRL legal entity and is a member of Innovative Medicines Luxembourg (IML). As an IML member company, BeOne is required to disclose Transfers of Value to Healthcare Professionals (HCPs), Healthcare Organisations (HCOs), and Patient Organisations (POs) in accordance with the IML Code of Ethics, which implements the EFPIA Code of Practice within the Luxembourg self-regulatory framework. These methodology notes have been prepared in line with the structure for methodological guidance on HCP/HCO/PO disclosure set out in Annex B of the EFPIA Code of Practice.

With effect from 27 May 2025, the company changed its global name from "BeiGene, Ltd." to "BeOne Medicines Ltd.". In Luxembourg, the reporting entity remains BeOne Medicines Belgium SRL. This reflects a change of the company's trading name only and does not constitute a change of legal entity. Transfers of Value disclosed under the BeiGene name in previous reporting years and those disclosed under the BeOne Medicines name from the 2025 reporting year onwards therefore relate to the same legal entity, ensuring continuity and traceability of disclosures across reporting periods.

#### 2.0 DEFINITIONS

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

**Products in scope:** The disclosure covers transfers of value connected with prescription-only medicinal products for human use, whether generic or branded. Transfers of value relating to over-the-counter products, medical devices and other products outside this scope are not included in this disclosure report.



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## TRANSPARENCY METHODOLOGY NOTES

### REPORTING YEAR 2025

---

#### 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, in the course of his or her professional activities, may prescribe, purchase, supply, recommend or administer a Medicinal Product, and whose primary practice, principal professional address is Luxembourg

##### **Patient Organization (PO)**

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

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

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

**Retired and deceased recipients:** Transfers of value to retired HCPs are disclosed where the recipient still met the definition of an HCP at the time the transfer of value was made. Where BeOne becomes aware that a recipient is deceased, the related transfers of value are reported in the aggregate section of the disclosure report rather than on a named individual basis, in line with IML Code of Ethics guidance.

#### 2.2. Expense type

##### **Donations and Grants to HCOs**

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

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



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## TRANSPARENCY METHODOLOGY NOTES

### REPORTING YEAR 2025

---

#### **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**

ToVs resulting from or related to contracts between BeOne and institutions, organisations, associations or HCPs under which such institutions, organisation, association or HCPs provide any type of services to BeOne, 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



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## TRANSPARENCY METHODOLOGY NOTES

### REPORTING YEAR 2025

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#### **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

#### **Transfers of value out of scope (excluded)**

Certain transfers of value fall outside the scope of this disclosure and are not reported, including: transfers that form part of the ordinary course of the purchase and sale of medicinal products (such as trade discounts and rebates); the provision of medical samples; informational or educational materials and items of medical utility within the applicable thresholds; and meals and beverages within the limits permitted by the IML Code of Ethics. Transfers of value to recipients located outside Luxembourg are not reported here but are disclosed in the relevant country.

### **3.0 DATE METHODOLOGY**

BeOne 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

Where BeOne sponsors an HCP's participation in a specific event and later reimburses the associated costs against an invoice, the date on which that invoice is paid is used as both the event start date and the event end date, as no separate event date is captured in these cases.

#### **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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## TRANSPARENCY METHODOLOGY NOTES

### REPORTING YEAR 2025

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**Multi-year agreements:** Where a contract or transfer of value spans more than one reporting year, the value is allocated to the reporting year in which each underlying activity takes place or each payment is made, applying the event-date and payment-date rules set out above. A single multi-year agreement may therefore give rise to disclosures across several reporting years.

#### 4.0 DISCLOSED VALUES

##### 4.1. Tax and VAT

In general, BeOne excludes Tax and VAT for Monetary payments/transfers of value (ToVs). Because some amounts are obtained from external data providers, it is possible that a limited number of transactions still include VAT. VAT is excluded for all R&D ToVs (transfers of value).

##### 4.2. Disclosure currency

All payments and transfers of value are disclosed in the local currency Euro (EUR). If a payment is made in another currency, it is converted into EUR using the daily exchange rate applicable on the date on which the transfer of value occurred.

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

Where a flight or accommodation is booked but the event is subsequently cancelled, or the HCP does not attend, no transfer of value is 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 BeOne 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 BeOne for the benefit of an HCP/HCO Recipient, where the identity of BeOne is known to or can be identified by the Recipient and where BeOne can identify the HCP/HCO that benefits from the TOV. (For example, single-blinded or double-blinded market research are excluded).



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## TRANSPARENCY METHODOLOGY NOTES

### REPORTING YEAR 2025

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Examples:

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

#### **4.5. Individual and aggregate disclosure**

To the extent permitted, transfers of value are disclosed on an individual, named basis where the recipient has consented to individual disclosure. Where individual disclosure is not possible – for example, where consent has not been given or has been withdrawn, or where disclosure on a named basis is not permitted for legal reasons – the relevant transfers of value are reported in aggregate. In line with the IML Code of Ethics and the EFPIA Code, all Research & Development transfers of value are disclosed on an aggregate basis.

#### **4.6. Self-incorporated HCPs**

Where an HCP provides services through his or her own company or other legal entity (a self-incorporated HCP), the related transfer of value is disclosed either under the individual HCP or under that entity as an HCO, depending on the circumstances of the engagement and the information available to BeOne.

#### **4.7. Valuation of non-monetary (in-kind) transfers of value**

Non-monetary (in-kind) transfers of value, such as travel, accommodation and registration provided directly to a recipient, are disclosed at the actual cost incurred by BeOne or, where the actual cost is not available, at fair market value.

### **5.0 DISCLOSURE OF CROSS BORDER TRANSACTIONS**

BeOne will disclose based on the principal practice address of the recipient, regardless of where payment is made. BeOne 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.



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## TRANSPARENCY METHODOLOGY NOTES

### REPORTING YEAR 2025

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#### 6.0 CONSENT MANAGEMENT

- **HCPs** may exercise their disclosure preference.
- **HCOs** are disclosed individually and are not subject to consent.

BeOne collects consent for individual disclosure from HCPs through the relevant contract. HCOs are disclosed by default, in accordance with applicable local requirements, where BeOne has entered into an engagement or interaction with them. The contracting party is asked to review the consent clause and confirm their disclosure decision.

Prior to publication, all HCPs will receive an email informing them of the total amount of Transfers of Value to be disclosed and will have the opportunity to review their disclosure preference before publication.

Where consent is not given, the relevant transfers of value are disclosed in aggregate. BeOne has appropriate arrangements in place to disclose this information lawfully, and recipients are informed of the disclosure process at the time of contracting.

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

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

#### Revocation of Individual Disclosure Consent

- If an HCP withdraws consent before publication of the Disclosure Report, BeOne will update the disclosure accordingly and report the relevant Transfers of Value in the aggregate section of the applicable Disclosure Report.
- If an HCP withdraws consent after publication, BeOne will update the published information retrospectively or prospectively, as required by the applicable local laws, regulations, or the IML Code of Ethics, at the earliest reasonable opportunity.

#### 7.0 TIMING OF DISCLOSURE

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



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## TRANSPARENCY METHODOLOGY NOTES

### REPORTING YEAR 2025

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#### 8.0 PUBLIC DISCLOSURE AND RETENTION PERIOD

**Disclosure platform:** The Disclosure Report is published on the publicly accessible BeOne Medicines website in accordance with the IML Code of Ethics. The published reports remain publicly available for a period of three years.

Supporting documentation relating to the reported Transfers of Value is retained in BeOne's records and archived for a minimum period of five years, in accordance with applicable legal and regulatory requirements.

**Disclosure language:** The disclosure report and these methodology notes are made available in English.

**Data quality checks:** Before publication, BeOne carries out internal quality checks on the data to be disclosed. These checks include the validation and reconciliation of recipient information, transfer-of-value categories and amounts against the underlying source systems, in order to confirm that the disclosure is accurate and complete.

#### 9.0 GLOSSARY OF TERMS

TERM	DEFINITION
HCP	Healthcare professional
HCO	Healthcare Organization
IML	Innovative Medicines for Luxembourg
TOV	Transfer of Value
R & D	Research & Development
PCO	Partners in Congress organization
EFPIA	European Federation of Pharmaceutical Industries and Associations
PATORG	Patient Organization



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**TRANSPARENCY METHODOLOGY NOTES**  
**REPORTING YEAR 2025**

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IQVIA	External data provider whose database is used to determine the principal practice address of HCPs and HCOs
GDPR	General Data Protection Regulation (Regulation (EU) 2016/679)
GLP	Good Laboratory Practice

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