

Disclosure of payments made by Chugai across Europe in 2020

Chugai Pharma Europe Ltd and Chugai Pharmaceutical Co. Ltd, Japan disclose all relevant transfers of value to Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs) made in the European Union in accordance with the EFPIA Disclosure Code¹ and the relevant local Codes of Practice and/or local legal requirements, and also in accordance with Data Protection regulations (including but not limited to the General Data Protection Regulation (GDPR) (EU) 2016/679 and local legislation)².

The move towards greater transparency is part of a Europe-wide initiative designed to bring clarity and transparency to the manner in which the research based pharmaceutical industry and the healthcare community collaborate, which ultimately have been shown to benefit patient care. The HCP offers invaluable expertise on disease management and plays an important part in informing the pharmaceutical industry's efforts to improve patient care and treatment – both critical to improving health outcomes. It's important that these interactions meet the highest standard of integrity that patients, governments, regulatory bodies, other stakeholders and the media expect. Our goal is to assure the public that such relationships do not influence clinical decisions and that they can trust their HCP to recommend treatment, or administer appropriate care based solely on clinical evidence and experience.

Chugai Pharma Europe Ltd and Chugai Pharmaceutical Co. Ltd, Japan support the initiative by The European Federation of Pharmaceutical Industries and Associations (EFPIA) (<https://www.efpia.eu/>) and has taken the decision to disclose all transfers of value in keeping with the EFPIA Code on Disclosure on Transfers of Value to Pharmaceutical Companies to HCPs and HCOs (<https://www.efpia.eu/relationships-code/disclosure-of-payments-to-hcps/>) for both direct and indirect payments made across the European Union from any part of the Chugai corporation. Furthermore, some payments will be disclosed by Chugai Pharma Europe to other European countries not within the European Union.

The local payments in those countries where there is a Chugai affiliate business then these are disclosed via central platforms in France, Germany and the UK respectively in accordance with local Code requirements:

Chugai Pharma UK disclose in accordance with both The Association of British Pharmaceutical Industry (ABPI)³ and the Irish Pharmaceutical Healthcare Association (IPHA)⁴ as the company undertakes marketing activities in both Member States.

Chugai Pharma France disclose in accordance with Loi Bertrand via the website Ordre National Des Mediciens⁵.

Chugai Pharma Germany disclose in accordance with the Code of Conduct of the members of Verein Arzneimittel und Kooperation im Gesundheitswesen e.V. ("AKG")⁶.

Chugai Pharmaceutical Co. Ltd, Japan disclose in accordance with The Japan Pharmaceutical Manufacturers Association (JPMA) Code of Practice⁷.

Payments made in the United States are disclose in accordance with The Physician Financial Transparency Report ('Sunshine Act') managed by Genentech⁸.

Chugai Pharma Europe Ltd and Chugai Pharmaceutical Co. Ltd, Japan have also taken the initiative to disclose all transfers of value relating to those HCPs and HCOs who are registered to practice in European countries where there is no Chugai office or marketing activities. Direct payments take place where a HCP has provided consultative support with regards to product development in order to give a better understanding of local treatment and regulatory needs. For these engagements there is a contract containing clearly defined consultative role in content, context and format and any payment would be strictly controlled through standard Fair Market Value limitations⁹. Such engagements would include attendance to advisory boards meetings or speaking at a company-sponsored event. Indirect payments take place during the research and development phase where responsibility for managing a clinical trial has been outsourced to a Clinical Research Organisation (CRO). The CRO are responsible for making these payments, and Chugai is responsible for ensuring such indirect payments are disclosed accurately. Payments relating to research and development are to be disclosed in an aggregated form in accordance with EFPIA requirements:

Research and Development ToV. Research and Development ToVs in each Reporting Period must be disclosed by each Member Company on an aggregate basis. Costs related to Events that are clearly related to activities covered in this section can be included in the aggregate amount under the “Research and Development Transfers of Value” category. (Please refer to page 31 of the EFPIA Code of Practice)

Payments relating to activities that do not fit the criteria of research and development are disclosed at an individual level. Payments made by Chugai Pharma Europe Ltd and Chugai Pharmaceutical Co. Japan will also be made in the non R&D setting where a therapy area specialist may be invited to provide advice at an advisory board or attend a company-sponsored event as a speaker.

In most EU Member States explicit consent is a fundamental requirement in order to disclose at a named individual level which captures payments relating to

- the contribution of costs related to events (e.g. travel, accommodation) and includes sponsorship
- fees for service and consultancy.

Chugai upholds and works according to The General Data Protection Regulation 2016/679 (GDPR). Where explicit consent is not given then the transfer of value will be disclosed in an aggregated form.

Chugai encourages all transfers of value to be disclosed in a form that is transparent and will disclose according to the requirements of each Member State.

Payments made to Healthcare Organisations are all disclosed at a named institutional level.

The disclosed payments are in local currency where possible. The information given relates to payments made in the financial year Jan 1st, 2020 to Dec 31st, 2020 and relates to the dates of payments rather than event dates.

The EFPIA Code requires disclosure in the country where the Recipient has its principal practice. All Transfers of Value to a given recipient will be disclosed in the country where this principal practice is located.

The EFPIA Code states that each Member Company will decide how to organise its disclosures, either at a central or local level, unless the national code fixes the platform of disclosure. However, disclosure should conform to the national code requirements and relevant disclosures should be publicly accessible in the country where the Recipient has their practice. If a Member Company is not resident or does not have a subsidiary or an affiliate in the country where the Recipient has their principal practice, the Member Company should disclose the Transfer of Value in a manner consistent with the national code of the country where the Recipient has their practice. This information will be publicly available for 3 (three) years and stored for a minimum of 5 (five) years. Chugai does not support partial disclosure. Chugai supports these initiatives and will adhere to the relevant Codes of Practice.

This is a progressive initiative with the objective for Chugai to disclose all transfers of value in a format which is in accordance with local requirements (using the standard template) and supported by methodological notes outlining definitions and practices which will be provided in a commonly used local language, thus ensuring the highest level of transparency.

Chugai is not a direct member of EFPIA and does not have a business office in every country so is not required to disclose in every country. Chugai is doing so in the spirit of transparency.

Chugai has made every effort to ensure accuracy. However, currency conversion rates may result in the disclosed figures being slightly different. To discuss any issue directly with Chugai, contact disclosure@chugai-pharm.co.uk

Head of Compliance, Chugai Pharma Europe

References:

1. EFPIA Code on Disclosure on Transfers of Value to Pharmaceutical Companies to Healthcare Professionals and Healthcare Organisations (<https://www.efpia.eu/relationships-code/disclosure-of-payments-to-hcps/>)
2. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679>
3. <http://www.abpi.org.uk/our-work/disclosure/Pages/DocumentLibrary.aspx>
4. <https://www.transferofvalue.ie/>
5. <https://www.transparence.sante.gouv.fr/flow/main?execution=e2s1>
6. <https://www.ak-gesundheitswesen.de/?cn-reloaded=1>
7. <http://www.jpma.or.jp/english/>
8. www.gene.com
9. <https://www.efpia.eu/relationships-code/national-codes/>

Payments made in 2020

Payments were made to Healthcare Professionals and/or Healthcare Organisations in the following countries:

Click on the COUNTRY NAME to access the disclosed payment details.

Click on the LOCAL LANGUAGE to access the methodological notes in a commonly spoken local language.

Click on 'Methodological notes in English' for full detail.

Member States where Payments Were Made in 2020	Abbreviated methodological notes in local language	
Austria	German	Methodological notes in English
Belgium	Dutch	
Bulgaria	Bulgarian	
Croatia	Croatian	
Georgia	Russian	
Hungary	Hungarian	
Italy	Italian	
Norway	Available upon request	
Poland	Polish	
Romania	Romanian	
Spain	Spanish	
Switzerland	German	
Turkey	Turkish	
Ukraine	Ukrainian	

Chugai has made every effort to ensure accuracy. However, currency conversion rates may result in the disclosed figures being slightly different. To discuss any issue directly with Chugai, contact disclosure@chugai-pharm.co.uk

Head of Compliance, Chugai Pharma Europe

AUSTRIA

Disclosure of transfers of value made by Chugai during 2020 in AUSTRIA													
											EFPIA template		
											Date of publication: 30/06/2021		
For further information please go to https://www.chugai.eu/ or contact disclosure@chugai-pharm.co.uk													
	Full Name (Art. 1.01)	HCPs: City of Principal Practice HCOs: city where registered (Art. 3)	Country of Principal Practice (Schedule 1)	Principal Practice Address (Art. 3)	Unique country identifier OPTIONAL (Art. 3)	Donations and Grants to HCOs (Art. 3.01.1.a)	Contribution to costs of Events (Art. 3.01.1.b & 3.01.2.a)			Fee for service and consultancy (Art. 3.01.1.c & 3.01.2.c)		Euros	TOTAL OPTIONAL
							Sponsorship agreements with HCOs / third parties appointed by HCOs to manage an Event	Registration Fees	Travel & Accommodation	Fees	Related expenses agreed in the fee for service or consultancy contract, including travel & accommodation		
HCPs	INDIVIDUAL NAMED DISCLOSURE - one line per HCP (i.e. all transfers of value during a year for an individual HCP will be summed up; itemization should be available for the individual Recipient or public authorities' consultation only, as appropriate)												
	OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons												
	Aggregate amount attributable to transfers of value to such Recipients - Art. 3.02					N/A	N/A						
	Number of Recipients in aggregate disclosure - Art. 3.02					N/A	N/A						
	% of the number of Recipients included in the aggregate disclosure in the total number of Recipients disclosed - Art. 3.02					N/A	N/A						
HCOs	INDIVIDUAL NAMED DISCLOSURE - one line per HCO (i.e. all transfers of value during a year for an individual HCO will be summed up; itemization should be available for the individual Recipient or public authorities' consultation only, as appropriate)												
	OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons												
	Aggregate amount attributable to transfers of value to such Recipients - Art. 3.02												
	Number of Recipients in aggregate disclosure - Art. 3.02												
	% of the number of Recipients included in the aggregate disclosure in the total number of Recipients disclosed - Art. 3.02												
R & D	AGGREGATE DISCLOSURE												
												16,000.00 €	

latest update: 11 December 2013 v1

BELGIUM

Type Of Beneficiary or of premium or benefit	Beneficiary			Unique Identifiers				Premiums and advantages granted to the beneficiary							
	Name	ZIP Code	Profession (HCP)	Company Number (HCO,PO)	NIHDI number (HCP)	National Registry Number (HCP)	Random identifier given by betransparent.be (HCP, HCO, PO)	Donations and Grants that support healthcare	sponsorship agreements with (third parties appointed by) HCOs to manage a scientific event	Registration Fees for a scientific event	Travel and accomodation in the frame of a scientific event	Fees for services and consultancy	Payments/reimbursements of expenses for service and consultancy (including travel & accomodation)	Financial support to patients organisations	Other support to patients organisations
	Royal Decree Art. 5 §1 et §2			Art. 3, 5°a	Art. 3, 5°b	Art. 3, 5°c	Art. 3, 5°d	Art. 2 §1 2°c	Art. 2 §1 2°a	Art. 2 §1 1°a et §1 2°a	Art. 2 §1 1°b, 2°b et 3°a		Art. 2 §1 3°b		Art. 2 §2
HCP	SALGADO FIGUEROA, ROBERTO	9140	Docteur		A1404-78149						1 058.00	1 000.00			
RD															

BULGARIA

Приложение No 2 - Формат на оповестяване														
по чл.13 от Кодекса за оповестяване на предоставяне на стойност												дата на публикуване: 18-06-2021 19:34		
		Име/Наименование	Град, в който се упражнява дейността/ МС/ седалище на ЗО	Държава по регистрация на практиката	Адрес на практиката	УИН/МС, ЕИК или код по Булстат за ЗО	Дарения и спонсорство за ЗО (чл.18(1) т.1.1)	Разходи, свързани с участие в събития (чл. 18(1) т. 1.2 и чл.18(2) т. 1.2.)			Плащания за услуги и консултации / Хонорари (чл.18(1) , т. 1.3 и чл.18(2) , т.2.2)		ОБЩО	
		(чл. 2)	(чл. 8)	чл. 8,9, 10, и 15	чл. 8,9, 10, и 15	чл. 8,9, 10, и 15		Договори за спонсорство със ЗО или с трети лица, посочени от ЗО като отговорни за провеждането на събития	Такси за регистрация	Пътуване и настаняване	Хонорари	Съпътстващи разходи за услуги, уговорени в консултантския договор		
		ИНДИВИДУАЛНО Оповестяване												
		-отделен ред за всеки МС (т.е. всякъвкъм вид предоставяне на стойност на МС през годината ще бъде сумирана; детайлна информация ще бъде предоставена единствено и само на съответния медицински специалист или държавен орган при нужда)												
							0	0	0	0	0	0	0	
		0												
		Индивидуално, поименно оповестяване												
		- отделен ред за ЗО (т.е. всички предоставяния на стойност за отделна ЗО се сумират; подробности следва да са достъпни за отделния Получател или при поискване от оправомощени публични органи												
							0	0	0	0	0	0	0	
		ДРУГИ (невключени по-горе поради правни ограничения, позволяващи информацията да се оповести на индивидуална основа)												
ИНДИВИДУАЛНО Оповестяване	Здравни организации и	Обща сума на предоставената стойност на здравни организации - чл.19						0	0	0	0	0	0	0
		Брой здравни организации на обобщен принцип - чл.19						0	0	0	0	0	0	0
		% на брой Получатели, включени в обобщеното оповестяване, от общия брой на тези получатели - чл.19						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	N/A
		ОБЩЕНО Оповестяване												
ОБЩЕНО Оповестяване	Научноизследователска и развойна дейност	Предоставяне на стойност за научноизследователска и развойна дейност (чл.21)										36,854.50 лв	36,854.50 лв	

ЗО - ЗДРАВНИ ОРГАНИЗАЦИИ
 МС - МЕДИЦИНСКИ СПЕЦИАЛИСТИ
 НРД - НАУЧНОИЗСЛЕДОВАТЕЛСКА И РАЗВОЙНА ДЕЙНОСТ

CROATIA

Dodatak 2 - 2020											Datum objave: 18-06-2021 19:38	
											Reporting Currency: HRK	
Ime i prezime	Zdravstveni radnik: Grad osobnog ili profesionalnog prebivališta ili sjedišta	Država profesionalno g prebivališta ili sjedišta Primatelja	Primarna adresa profesionalne djelatnosti	adresa profesionalne djelatnosti Jedinствена oznaka države (OPCIONALNO)	Donacije Zdravstvenim organizacijama(čl. 21.1.A.(i))	Troškovi u vezi Sastanaka (čl. 21.1.A. (ii) i 21.1.B.(ii))			Naknada za usluge (čl. 21.1.A.(iii) i 21.1.B. (ii))		UKUPNO OPCIONALNO	
(čl. 19.1.)	(čl. 20.6.)	(čl. 20.6.)	(čl. 20.6. u vezi čl. 21.)	(čl. 20.6.)	Iznos sponzorstva iz ugovora o sponzorstvu sa Zdravstvenom organizacijom/ trećim osobama (u ime Zdravst. Organizacije)	Trošak kotizacije	Putni troškovi i troškovi smještaja	Naknada	Vezani troškovi koji su ugovoreni iz naknade u vezi izvršavanja usluga			
POJEDINAČNO OBJAVLJIVANJE IMENA – jedan red po Zdravstvenom radniku (tj. svi Prijenosi Vrijednosti tijekom godine po pojedinačnom Zdravstvenom radniku biti će zbrojeni; dostupnost pojedinačnog izvještaja treba biti osigurana na zahtjev Primatelja ili nadležnih tijela vlasti, već prema slučaju)												
OSTALO, ŠTO NIJE UKLJUČENO GORE: kada zbog postojanja pravnih zapreka podatak nije moguće objaviti pojedinačno												
Zdravstveni radnik	Zbirno objavljivanje s naslova Prijenosa Vrijednosti Primateljima – čl. 21.2.1.				N/A	N/A	0	0	0	0	0	0
	Ukupni broj Primatelja kod zbirne objave – čl. 21.2.1.				N/A	N/A	0	0	0	0	0	0
	% broja Primatelja kod zbirnog objavljivanja u odnosu na ukupni broj Primatelja – čl. 21.2.1.				N/A	N/A	0.00%	0.00%	0.00%	0.00%		0.00%
POJEDINAČNO OBJAVLJIVANJE IMENA – jedan red po Zdravstvenoj organizaciji (tj. svi Prijenosi Vrijednosti tijekom godine po pojedinačnom Zdravstvenoj organizaciji biti će zbrojeni; dostupnost pojedinačnog izvještaja treba biti osigurana na zahtjev Primatelja ili nadležnih tijela vlasti, već prema slučaju)												
OSTALO, ŠTO NIJE UKLJUČENO GORE: kada zbog postojanja pravnih zapreka podatak nije moguće objaviti pojedinačno												
Zdravstvena organizacija	Zbirno objavljivanje s naslova Prijenosa Vrijednosti Primateljima – čl. 21.2.1.				0	0	0	0	0	0	0	0
	Ukupni broj Primatelja kod zbirne objave – čl. 21.2.1.				0	0	0	0	0	0	0	0
	% broja Primatelja kod zbirnog objavljivanja u odnosu na ukupni broj Primatelja – čl. 21.2.1.				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%
Istraživanje i Razvoj	ZBIRNO OBJAVLJIVANJE											
	Prijenos Vrijednosti u svrhu Istraživanja i Razvoja prema definiciji iz čl. 21.2.2.										50,802.20	50,802.20

GEORGIA

Disclosure of transfers of value made by Chugai during 2020 in GEORGIA													
											EFPIA template		
											Date of publication: 30/06/2021		
For further information please go to https://www.chugai.eu/ or contact disclosure@chugai-pharm.co.uk													
	Full Name (Art. 1.01)	HCPs: City of Principal Practice HCOs: city where registered (Art. 3)	Country of Principal Practice (Schedule 1)	Principal Practice Address (Art. 3)	Unique country Identifier OPTIONAL (Art. 3)	Donations and Grants to HCOs (Art. 3.01.1.a)	Contribution to costs of Events (Art. 3.01.1.b & 3.01.2.a)			Fee for service and consultancy (Art. 3.01.1.c & 3.01.2.c)		Euros	TOTAL OPTIONAL
							Sponsorship agreements with HCOs / third parties appointed by HCOs to manage an Event	Registration Fees	Travel & Accommodation	Fees	Related expenses agreed in the fee for service or consultancy contract, including travel & accommodation		
HCPs	INDIVIDUAL NAMED DISCLOSURE - one line per HCP (i.e. all transfers of value during a year for an individual HCP will be summed up. Itemization should be available for the individual Recipient or public authorities' consultation only, as appropriate)												
	OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons												
	Aggregate amount attributable to transfers of value to such Recipients - Art. 3.02						N/A	N/A					
Number of Recipients in aggregate disclosure - Art. 3.02						N/A	N/A						
% of the number of Recipients included in the aggregate disclosure in the total number of Recipients disclosed - Art. 3.02						N/A	N/A						
HCOs	INDIVIDUAL NAMED DISCLOSURE - one line per HCO (i.e. all transfers of value during a year for an individual HCO will be summed up. Itemization should be available for the individual Recipient or public authorities' consultation only, as appropriate)												
	OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons												
	Aggregate amount attributable to transfers of value to such Recipients - Art. 3.02												
Number of Recipients in aggregate disclosure - Art. 3.02													
% of the number of Recipients included in the aggregate disclosure in the total number of Recipients disclosed - Art. 3.02													
R.M.D	AGGREGATE DISCLOSURE												
													1,933.87 €

latest update: 11 December 2013 v1

HUNGARY

EFPIA nyilvános jelentés - 2020										Date of publication: 19-06-2021 19:48		
										Jelentési pénznm: HUF		
Név	Székhely (Egészségügyi szolgáltató / szervezet) vagy praxis helye (Egészségügyi szakember)	Tevékenység végzésének helye (ország szerint)	Tevékenység végzésének címe	Pecétszám / nyilvántartási szám (cégjegyzékszám, statisztikai számjel stb.) OPCIONÁLIS	Egészségügyi szolgáltatók / szervezetek nyújtott adományok és támogatások (3.01.1.a pont)	Rendezvényekhez nyújtott Juttatások (3.01.1.b & 3.01.2.a pont)			Szolgáltatói és tanácsadói díjak (3.1.1.c & 3.1.2.b pont)		Összeg OPCIONÁLIS	
						Rendezvény szervezésére kötött támogatási szerződés	Regisztrációs díjak	Utazási és szállás költségtérítés	Díjak	A szolgáltatási és tanácsadói szerződésben meghatározott járulékos költségek		
(3. pont)	(3. pont)	(1. Melléklet)	(3. pont)	(3 pont)								
Nevesített közzététel - az adott egészségügyi szakemberre vonatkozó, tárgyév során nyújtott juttatások egy sorban jelennek meg és kategóriánként kerülnek összegzésre. A juttatások egyenkénti bontása is elérhető, amennyiben releváns.												
						0	0	0	0	0	0	0
Egyéb, a fent említeteken kívüli juttatások (az információ jogszabályi okok miatt nem nevesített formában, hanem aggregáltan kerül közzétételre)												
Az aggregált juttatások összege - 3.2. pont						N/A	N/A	0	5,025,031	0	0	6,025,031
A kedvezményezettek száma az aggregált formában történő közzétételben - 3.2. pont						N/A	N/A	0	4	0	0	4
A kedvezményezettek aránya (%) a kedvezményezettek teljes számához viszonyítva az aggregált formában történő közzétételben - 3.2. pont						N/A	N/A	0.00%	100.00%	0.00%	0.00%	100.00%
Nevesített közzététel - az adott egészségügyi szervezetre vonatkozó, tárgyév során nyújtott juttatások egy sorban jelennek meg és kategóriánként kerülnek összegzésre. A juttatások egyenkénti bontása is elérhető, amennyiben releváns.												
						0	0	0	0	0	0	0
Egyéb, a fent említeteken kívüli juttatások (az információ jogszabályi okok miatt nem nevesített formában, hanem aggregáltan kerül közzétételre)												
Az aggregált juttatások összege - 3.2. pont						0	0	0	0	0	0	0
A kedvezményezettek száma az aggregált formában történő közzétételben - 3.2. pont						0	0	0	0	0	0	0
A kedvezményezettek aránya (%) a kedvezményezettek teljes számához viszonyítva az aggregált formában történő közzétételben - 3.2. pont						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
ÖSSZESEN												
KÖZZÉTÉTEL												
Kutatás-Fejlesztési juttatások (3.04. pont)										1,692,386	6,717,417	

ITALY

ALLEGATO 1 Data di pubblicazione:18/06/2021												
Full Name Cognome e Nome/ Denominazione	HCPs: City of Principal Practice HCOs: city where registered Operatori sanitari: Città dove si svolge prevalentemente la professione Organizzazioni sanitarie: Sede Legale	Country of Principal Practice Stato dove si svolge prevalentemente la professione/ attività	Principal Practice Address Indirizzo dove si svolge prevalentemente la professione/attività	Unique country identifier OPTIONAL Codice di identificazione del Paese (Facoltativo)	Donations and Grants to HCOs Donazioni e contributi a organizzazioni sanitarie	Contribution to costs of Events (Art. 3.01.1.b and 3.01.2.a CD) Contributo per il finanziamento di eventi (es. convegni, congressi e riunioni scientifiche) (Punto 5.5, lettera a) e Punto 5.6, lettera b) e allegato 2 CE			Fee for service and consultancy Corrispettivi per prestazioni professionali e consulenze (punto 5.5 lettera b e punto 5.6 lettera c) CE		TOTAL Optional TOTALE Facoltativo	
(Art. 1.01) Codice EFPIA Disclosure(CE) Punto 5.1 Codice deontologico Farindustria (CD)	(Art. 3 CE) da Punto 5.5 a 5.7 CD	(Modulo 1CE) Allegato 2(CD)	(Art. 3 CE) (da Punto 5.5 a 5.7CD)	(Art. 3CE) (Punto 5.6, lettera a CD)	(Art. 3.01.1.a CE) (Punto 5.6, lettera a CD)	Sponsorship agreements with HCOs/third parties appointed by HCOs to manage an Event Accordi di sponsorizzazione con organizzazioni sanitarie/sogetti terzi nominati da organizzazioni sanitarie per la realizzazione di eventi	Registration fees Quote di iscrizione	Travel & Accommodation Viaggi e ospitalità	Fees Corrispettivi	Related expenses agreed in the fee for service or consultancy contract, including travel & accommodation relevant to the contract Spese riferibili ad attività di consulenza e prestazioni professionali risultanti da uno specifico contratto, comprendenti le relative spese di viaggio e ospitalità		
INDIVIDUAL NAMED DISCLOSURE - one line per HCP (i.e. all transfers of value during a year for an individual HCP will be summed up; itemization should be available for the individual Recipient or public authorities' consultation only, as appropriate) DATI SU BASE INDIVIDUALE - una riga per ciascun operatore sanitario (ossia sarà indicato l'importo complessivo di tutti i trasferimenti di valore effettuati nell'arco dell'anno a favore di ciascun operatore sanitario; il dettaglio sarà reso disponibile solo per il singolo Destinatario o per le Autorità competenti, su richiesta)												
OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons ALTRO, NON INCLUSO NELLE VOCI PRECEDENTI - nei casi in cui i dati non possono essere pubblicati su base individuale per motivi normativi (privacy)												
HCPs Operatori sanitari	Aggregate amount attributable to transfers of value to such Recipients - Art. 3.02 CE Dato aggregato attribuibile a trasferimenti di valore a tali Destinatari - Punto 5.6 CD				0	0	0	0	0	800.00	800.00	
	Number of Recipients in aggregate disclosure - Art. 3.02 CE Numero dei Destinatari i cui dati sono pubblicati in forma aggregata - Punto 5.6 CD				Non Applicable	Non Applicable	0	0	0	1	1	
	% of the number of Recipients included in the aggregate disclosure in the total number of Recipients disclosed - Art. 3.02 CE % del numero di Destinatari inclusi nel dato aggregato sul numero complessivo dei Destinatari - Punto 5.6 CD				Non Applicable	Non Applicable	0.00%	0.00%	0.00%	100.00%	100.00%	
	INDIVIDUAL NAMED DISCLOSURE - one line per HCO (i.e. all transfers of value during a year for an individual HCO will be summed up; itemization should be available for the individual Recipient or public authorities' consultation only, as appropriate) DATI SU BASE INDIVIDUALE - una riga per organizzazione sanitaria (ossia saranno indicati in aggregato tutti i trasferimenti di valore effettuati nell'arco dell'anno a favore di ciascuna organizzazione sanitaria; il dettaglio sarà reso disponibile solo per la singola Organizzazione sanitaria o per le autorità competenti)											
OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons ALTRO, NON INCLUSO NELLE VOCI PRECEDENTI - nei casi in cui i dati non possono essere pubblicati su base individuale per motivi legali												
HCOs Organizzazioni sanitarie	Aggregate amount attributable to transfers of value to such Recipients - Art. 3.02 CE Dato aggregato attribuibile a trasferimenti di valore a tali destinatari - Punto 5.6 CD				0	0	0	0	0	0	0	
	Number of Recipients in aggregate disclosure - Art. 3.02 CE Numero dei Destinatari i cui dati sono pubblicati in forma aggregata - Punto 5.6 CD				0	0	0	0	0	0	0	
	% of the number of Recipients included in the aggregate disclosure in the total number of Recipients disclosed - Art. 3.02 CE % del numero di destinatari inclusi nel dato aggregato sul numero complessivo dei destinatari - Punto 5.6 CD				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
R&D R&S	Transfers of Value re Research & Development as defined - Article 3.04 and Schedule 1 CE Trasferimenti di valore per Ricerca&Sviluppo come da definizione - Punto 5.8 e 5.9 e Allegato 2 CD										59,786.79	60,585.79

NORWAY

EFPIA TEMPLATE - NORSK VERSJON												Publisjonsdato: 18-06-2021 19:53	
												Rapporteringsvaluta: NOK	
	Fullstendig navn (Art. 1.01)	Helse-personell: Hovedpraksisens slød Helse-organisasjoner: Registreringssted (Art. 3)	Hovedprak- sise ns land (Vedlegg 1)	Hovedpraksisens adresse (Art. 3)	Entydig landsidentifikator VALGFRITT (Art. 3)	Gaver og donasjoner til helseorganisasjoner (Art. 3.01.1.a)	Bidrag til arrangementskostnader (125 §1.b)			Service- og konsulenthonorar (125 §1.c)		SUM VALGFRITT	
							Sponsoravtaler medhelse- organisasjoner/ trejdeparter utpekt/ engasjert av ehelse- organisasjon til å løde et arrangement	Påmeldingsavgifter	Reise og overnatting	Honorarer	Tilknyttede utgifter avtalt i kontrakten om service- eller konsulenthonorarer, herunder reise og overnatting i tilknytning til kontrakten		
	INDIVIDUELL OFFENTLIGGJØRING - én linje per helsepersonell (dvs. alle verdioverføringer for én enkelt helsemedarbeider i løpet av et år summeres: spesifisering er tilgjengelig bare på forespørsel fra den enkelte mottager eller vedkommende offentlige myndigheter)												
						0	0	0	0	0	0		
						0	0	0	0	0	0		
	INDIVIDUELL OFFENTLIGGJØRING - én linje per helseorganisasjon (dvs. alle verdioverføringer for én enkelt helseorganisasjon i løpet av et år summeres: spesifisering er tilgjengelig bare på forespørsel fra den enkelte mottager eller vedkommende offentlige myndigheter)												
						0	0	0	0	0	0		
						0	0	0	0	0	0		
	ANNET, ikke inkludert over - hvis informasjon ikke kan offentliggjøres individuelt av juridiske hensyn												
	Samlet beløp som kan tilskrives verdioverføringer til slike mottagere - Art 3.02					0	0	0	0	0	0		
	Antall samlet offentliggjorte mottagere - Art 3.02					0	0	0	0	0	0		0
	% av antall samlet offentliggjorte mottagere i totalt antall offentliggjorte mottagere - Art 3.02					0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%
	SAMLET OFFENTLIGGJØRING												
Forskni- ng og utviklin- g	Verdioverføringer i forbindelse med forskning og utvikling etter nærmere definisjon – Artikkel 3.04 og vedlegg 1											1,106,197	1,106,197

POLAND

1. Świadczenia uzyskane przez Przedstawicieli zawodów medycznych

Świadczenia przekazane przez ROCHE Polska i spółki z jego grupy kapitałowej z siedzibą poza terytorium Polski							Data Publikacji: 18-06-2021 19:58
Imię i nazwisko	Dokładny adres głównego miejsca prowadzenia działalności	Numer Prawa Wykonywania Zawodu (opcjonalnie)	Koszty poniesione w związku z Wydarzeniami		Wynagrodzenie z tytułu świadczonych usług		Suma
			Oplaty rejestracyjne	Koszty podróży i zakwaterowania	Wynagrodzenie podstawowe	Wydatki dodatkowe	
UDOSTĘPNIENIA INDYWIDUALNE							
			0	0	0	0	0
			0	0	0	0	0

2. Świadczenia uzyskane przez Organizacje ochrony zdrowia

Nazwa	Dokładny adres głównego miejsca prowadzenia działalności	Darowizny	Koszty poniesione w związku z Wydarzeniami			Wynagrodzenie z tytułu świadczonych usług		Suma
			Wartość umów sponsoringu	Oplaty rejestracyjne	Koszty podróży i zakwaterowania	Wynagrodzenie podstawowe	Wydatki dodatkowe	
UDOSTĘPNIENIA INDYWIDUALNE								
		0	0	0	0	0	0	0
UDOSTĘPNIENIA ZBIORCZE								
Suma wartości Świadczeń uzyskanych przez Beneficjentów		0	0	0	0	0	0	0
Liczba Beneficjentów objętych udostępnieniem zbiorczym		0	0	0	0	0	0	0
Procent Beneficjentów objętych udostępnieniem zbiorczym		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	nie dotyczy

3. Świadczenia związane z działalnością badawczo-rozwojową

145,024.31 PLN

ROMANIA

Disclosure of transfers of value made by Chugai during 2020 in ROMANIA													
											EFPIA template Date of publication: 30/06/2021		
For further information please go to https://www.chugai.eu/ or contact disclosure@chugai-pharm.co.uk													
	Full Name (Art. 1.01)	HCPs: City of Principal Practice HCOs: city where registered (Art. 3)	Country of Principal Practice (Schedule 1)	Principal Practice Address (Art. 3)	Unique country identifier OPTIONAL (Art. 3)	Donations and Grants to HCOs (Art. 3.01.1.a)	Contribution to costs of Events (Art. 3.01.1.b & 3.01.2.a)			Fee for service and consultancy (Art. 3.01.1.c & 3.01.2.c)		RON	TOTAL OPTIONAL
							Sponsorship agreements with HCOs / third parties appointed by HCOs to manage an Event	Registration Fees	Travel & Accommodation	Fees	Related expenses agreed in the fee for service or consultancy contract, including travel & accommodation		
HCPs	<i>INDIVIDUAL NAMED DISCLOSURE - one line per HCP (i.e. all transfers of value during a year for an individual HCP will be summed up; itemization should be available for the individual Recipient or public authorities' consultation only, as appropriate)</i>												
						N/A	N/A						
						N/A	N/A						
	<i>OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons</i>												
	Aggregate amount attributable to transfers of value to such Recipients - Art. 3.02						N/A	N/A					
Number of Recipients in aggregate disclosure - Art. 3.02						N/A	N/A						
% of the number of Recipients included in the aggregate disclosure in the total number of Recipients disclosed - Art. 3.02						N/A	N/A						
HCOs	<i>INDIVIDUAL NAMED DISCLOSURE - one line per HCO (i.e. all transfers of value during a year for an individual HCO will be summed up; itemization should be available for the individual Recipient or public authorities' consultation only, as appropriate)</i>												
	<i>OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons</i>												
	Aggregate amount attributable to transfers of value to such Recipients - Art. 3.02												
Number of Recipients in aggregate disclosure - Art. 3.02													
% of the number of Recipients included in the aggregate disclosure in the total number of Recipients disclosed - Art. 3.02													
R & D	AGGREGATE DISCLOSURE												
	Transfers of Value re Research & Development as defined - Article 3.04 and Schedule 1											1,224.36 RON	

latest update: 11 December 2013 v1

SPAIN

EFPIA Report										
Date of publication: 23-06-2021 19:24										
Reporting currency: EUR										
	Full name	HCPs: City of Principal Practice HCOs: city where registered	UCI	Donations and Grants to HCOs	Contribution to costs of Events			Fee for service and consultancy		Research and Development
					Sponsorship agreements with HCOs / third parties appointed by HCOs to manage an Event	Registration Fees	Travel & Accommodation	Fees	Related expenses agreed in the fee for service or consultancy contract, including travel & accommodation relevant to the contract	
INDIVIDUAL NAMED DISCLOSURE - one line per HCP (i.e. all transfers of value during a year for an individual HCP will be summed up: itemization should be available for the individual Recipient consultation only, as appropriate)										
HCP-s	BALSA CRIADO, ALEJANDRO	Madrid	XXX309-XX	N/A	N/A	0	0	0	1,000	N/A
	CANALES ALBENDEA, MIGUEL ANGEL	Madrid	XXX309-XX	N/A	N/A	0	0	0	2,000	N/A
OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons										
HCP-s	Aggregate amount attributable to transfers of value to such Recipients			N/A	N/A	0	0	0	0	N/A
	Number of Recipients in aggregate disclosure			N/A	N/A	0	0	0	0	N/A
				N/A	N/A	0.00%	0.00%	0.00%	0.00%	N/A
				0	0	0	0	0	0	N/A
AGGREGATE DISCLOSURE										
R&D	Transfers of Value re Research & Development as defined									10,875

SWITZERLAND

					0	0	0	0	0	0	0
--	--	--	--	--	---	---	---	---	---	---	---

AGGREGIERTE OFFENLEGUNG FÜR ANGEHÖRIGE DER FACHKREISE											
		Gesamtbetrag	nicht anwendbar	nicht anwendbar	0	0	0	2,610.50	2,610.50		
AFK		Gesamtzahl der Empfänger geldwerter Leistungen pro Unterart	nicht anwendbar	nicht anwendbar	0	0	0	2	2		
		Prozentualer Anteil im Verhältnis zu allen AFK-Empfängern geldwerter Leistungen pro Unterart	nicht anwendbar	nicht anwendbar	0.00%	0.00%	0.00%	100.00%	100.00%		

					0	0	0	0	0	0	0
--	--	--	--	--	---	---	---	---	---	---	---

					0	0	0	0	0	0	0
--	--	--	--	--	---	---	---	---	---	---	---

AGGREGIERTE OFFENLEGUNG FÜR FORSCHUNG & ENTWICKLUNG											
F&E		Transfers of Value re Research & Development as defined									0

GESAMT											
GESAMT		Total amount of Transfers of Value paid to individual HCPs, HCOs and for Research & Development as defined									2,610.50

TURKEY

SMM'lere ve SK'lara Yapılan Değer Transferleri										Yayımlama Tarihi: 18-06-2021 20:18		
										Raporlama Yılı: 2020		
İsim Soyadı veya Resmî Tam Adı	SMM: (Sağlık Meslek Mensubu) Çalıştığı Birincil Şehir; SK: (Sağlık Kurumu/ Kuruluşu) Kayıtlı Olduğu Şehir	Çalıştığı Birincil Ülke	Ana Çalışma Adresi	Özgül Takip/ Kimlik Kodlaması (İsteğe bağlı)	SK'lara Bağışlar, Destekler ve Hibeler (Mad. 22.3.01.1.a)	Etkinlik Maliyetlerine Katkılar (Mad. 22.3.01.1.b & 22.3.01.2.a)			Danışmanlık ve Hizmet Karşılığı Ödemeler (Mad. 22.3.01.1.c & 22.3.01.2.c)		TOPLAM İSTEĞE BAĞLI	
						SK'larda ve/veya SK tarafından etkinliği yürütmek için seçilen 3. taraflarla yapılan Destek Sözleşmeleri	Kayıt Ücretleri	Seyahat ve Konaklama	Ücretler, Ödemeler	Danışmanlık / Hizmet Sözleşmesinde yer alan sözleşmeyle bağlantılı yol ve konaklama masrafları dahil, sözleşmeyle ilişkili masraflar		
(Mad. 22.1.01)	(Mad. 22.3)	(Tanımlar)	(Mad. 22.3)	(Mad. 22.3)								
İSİM VERİLEREK YAPILAN BİREYSEL AÇIKLAMA - (Örnek: Her bir SMM için yıl boyu yapılan tüm değer transferleri toplanacaktır; gerektiğinde yalnızca kamu makamları veya ilgili Alıcı (SMM) inceleme talebinde bulunduğu sunulmak üzere harcama detayları hazır tutulmalıdır.)												
					N/A	N/A	0.00	0.00	0.00	0.00	0.00	
YUKARIDA YER ALMAYAN DİĞER TRANSFERLER - Yasal nedenlerle bireysel bazda açıklanamayan bilgiler												
SMM	Bu tür Alıcılara (SK) atfedilen Toplu Değer Transferleri - Mad 22.3.02				Kapsam Dışı	Kapsam Dışı	0.00	0.00	0.00	0.00	0.00	
	Toplu Değer Transferlerinde yer alan Alıcı sayısı - Mad 22.3.02				Kapsam Dışı	Kapsam Dışı	0	0	0	0	0	
	Hakkında açıklama yapılan toplam Alıcı (SK) sayısı içinde Toplu Değer Transferleri yapılan Alıcıların %'isi - Mad 22.3.02				Kapsam Dışı	Kapsam Dışı	0	0	0	0	0	
İSİM VERİLEREK YAPILAN BİREYSEL AÇIKLAMA - (Örnek: Her bir SK için yıl boyu yapılan tüm değer transferleri toplanacaktır; gerektiğinde yalnızca kamu makamları veya ilgili Alıcı (SK) inceleme talebinde bulunduğu sunulmak üzere harcama detayları hazır tutulmalıdır.)												
					0.00	0.00	0.00	0.00	0.00	0.00	0.00	
YUKARIDA YER ALMAYAN DİĞER TRANSFERLER - Yasal nedenlerle bireysel bazda açıklanamayan bilgiler												
SK	Bu tür Alıcılara (SK) atfedilen Toplu Değer Transferleri - Mad 22.3.02				0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	Toplu Değer Transferlerinde yer alan Alıcı sayısı - Mad 22.3.02				0	0	0	0	0	0	0	
	Hakkında açıklama yapılan toplam Alıcı (SK) sayısı içinde Toplu Değer Transferleri yapılan Alıcıların %'isi - Mad 22.3.02				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
TOPLU AÇIKLAMA												
AR-GE	Araştırma-Geliştirme Amaçlı Madde 22.3.04 ve Tanımlar'da tanımlanan Değer Transferleri (AR-GE ile açıkça ilişkili etkinliklerin masrafları eklenebilir.)										9,193.10	9,193.00

UKRAINE

APRADT Заїт - 2020										Дата публікації: 18-06-2021 20:20		
										Валюта звітування: UAH		
Повне ім'я	Професіонали сфери охорони здоров'я (ПОЗ): місто основної практики Організації сфери охорони здоров'я (ООЗ): місто реєстрації	Країна основної практики	Юридична адреса основного місця діяльності	Ідентифікаційний код країни ФАКУЛЬТАТИВН О	Пожертви і гранти, що здійснюються на користь ООЗ (Пп. 14.3.3)	Покрытие затрат, пов'язаних із проведенням Заходів (Пп. 14.3.3)			Платежі за надання послуг і консультування (Пп. 14.3.2 і 14.3.3)		ЗАГАЛЬНА СУМА (факультативно)	
						Спонсорські угоди з ООЗ або третіми особами, залученими ООЗ для проведення Заходу	Реєстраційні внески	Пройзд та проживання	Платежі за надання послуг і консультування	Витрати, пов'язані з договорами надання послуг та консультування, в тому числі витрати на проїзд і проживання, що узгоджені в договорі		
(Пп. 14.1.1)	(Ст. 14.3)		(Ст. 14.3)	(Ст. 14.3)								
РОЗКРИТТЯ НА ІНДИВІДУАЛЬНІЙ ОСНОВІ - один рядок для окремого ПОЗ (тобто, всі передані цінності, що здійснювалися на користь кожного ПОЗ протягом року, будуть сумуватися; деталізація повинна бути доступною кожному отримувачу або органам державної влади виключно при необхідності)												
					0	0	0	0	0	0	0	
ІНШЕ, НЕ ВКАЗАНО ВІЩЕ - якщо інформація не може бути розкрито на індивідуальній основі через причини правового характеру												
							0	0	0	0	0	
							0	0	0	0	0	
							0.00%	0.00%	0.00%	0.00%		
РОЗКРИТТЯ НА ІНДИВІДУАЛЬНІЙ ОСНОВІ - один рядок для окремої ООЗ (тобто всі передані цінності, що здійснювалися на користь окремої ООЗ протягом календарного року, будуть сумуватися; деталізація повинна бути доступною кожному отримувачу або органам державної влади виключно при необхідності)												
					0	0	0	0	0	0	0	
ІНШЕ, НЕ ВКАЗАНО ВІЩЕ - якщо інформація не може бути розкрито на індивідуальній основі через причини правового характеру												
Організації сфери охорони здоров'я (ООЗ)	Загальна сума, що відноситься до передані цінностей наданих на користь таких отримувачів (ПОЗ) - Пп.14.3.4				0	0	0	0	0	0	0	
	Кількість отримувачів, інформація про яких розкривається на загальній основі - Пп.14.3.4				0	0	0	0	0	0	0	
	% від загальної кількості отримувачів - Пп. 14.3.4				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
ЗАГАЛЬНЕ РОЗКРИТТЯ												
Дослідження і розробки	Переказ цінностей у зв'язку з проведенням досліджень і розробок, як це визначено у Пункті 14.3.6										69,753.42	69,753.00



Erklärung zur Methodik für die Offenlegung in EU-Ländern in lokaler Sprache

CHUGAI PHARMA EUROPE & UK LTD

ERKLÄRUNG ZUR METHODIK FÜR DIE OFFENLEGUNG

Chugai verpflichtet sich fest, den Verhaltenskodex der European Federation of Pharmaceutical Industry Associations (EFPIA) (<https://www.efpia.eu/>) und die jeweiligen Verhaltenskodexe der Verbände innerhalb der EFPIA für die jeweiligen Länder zu befolgen. Einer der Hauptgrundsätze dieser Kodexe beinhaltet die Offenlegung von Werttransfers an Fachpersonen aus dem Gesundheitswesen und zum Gesundheitswesen gehörende Organisationen.

Chugai unterhält noch nicht in allen EFPIA-Ländern eine feste Niederlassung. Eventuell kommt es jedoch vor, dass Chugai mit Fachpersonen und Organisationen aus dem Gesundheitswesen in Ländern interagiert, in denen es keinen festen Sitz hat. Dennoch verpflichtet sich Chugai, die oben angeführten Grundsätze für die Offenlegung zu befolgen, und bemüht sich um ein einheitliches Vorgehen hierzu in allen EFPIA-Ländern.

In Ländern mit einem nationalen Archiv wird Chugai um die Erlaubnis bitten, die betreffenden Informationen auf dieser Plattform offenzulegen, selbst dann, wenn das Unternehmen nicht physisch in diesem Land vertreten ist. Ist dies nicht möglich, so wird Chugai die Offenlegung auf seiner Firmenwebsite <https://www.chugai.eu/responsibility/transparency> vornehmen.

Chugai beantwortet gern Fragen zu allen Aspekten seiner Offenlegungspolitik und zu Einzelheiten über Werttransfers von Chugai an Fachpersonen und Organisationen aus dem Gesundheitswesen.

Bitte richten Sie eventuelle Fragen per E-Mail an: disclosure@chugai-pharm.co.uk

Diese Erklärung wurde in die Sprachen derjenigen Länder übersetzt, in die ein Werttransfer stattfand. Ferner wird zu einem späteren Zeitpunkt noch eine umfangreichere Version dieser Erklärung in englischer Sprache herausgegeben.



Methodiekverklaring in
lokale taal
voor
openbaarmaking in de EU

CHUGAI PHARMA EUROPE & UK LTD

METHODIEKVERKLARING

Chugai hecht veel waarde aan de gedragscodes van de Europese Federatie van Verenigingen van farmaceutische bedrijven (EFPIA) (<https://www.efpia.eu/>) en van die van de nationale verenigingen binnen de EFPIA. Een van de uitgangspunten van de gedragscodes is de openbaarmaking van overdracht van waarde aan gezondheidszorgprofessionals (healthcare professionals, HCP's) en gezondheidszorgorganisaties (healthcare organisations, HCO's).

Chugai heeft nog geen vaste basis in alle EFPIA-landen, maar Chugai werkt samen met HCP's en HCO's in landen waarin het geen vaste standplaats heeft. Desalniettemin blijft Chugai waarde hechten aan het uitgangspunt van openbaarmaking en streeft naar toepassing van een geharmoniseerde benadering van openbaarmaking in alle EFPIA-landen.

Daar waar een nationale bergingsfaciliteit bestaat, zal Chugai toestemming vragen voor openbaarmaking op dat platform, zelfs als het bedrijf geen fysieke basis heeft in dat land. Wanneer dit niet mogelijk is, zal Chugai gebruik maken van zijn Europese website: <https://www.chugai.eu/responsibility/transparency> voor openbaarmaking.

Alle vragen over zijn openbaarmakingbeleid en de bijzonderheden van de overdracht van waarden van Chugai naar HCP's en HCO's zijn welkom.

Neem voor vragen contact op met: disclosure@chugai-pharm.co.uk

Deze verklaring is vertaald naar de nationale talen van de landen waarin overdracht van waarden hebben plaatsgevonden. Er zal ook een meer uitgebreide Engelse versie beschikbaar worden gesteld.



Декларация за методологията
на местния език
за
оповестяване в ЕС

CHUGAI PHARMA EUROPE & UK LTD

ДЕКЛАРАЦИЯ ЗА МЕТОДОЛОГИЯТА

Chugai има ясен ангажимент спрямо Кодекса за оповестяване на Европейската федерация на фармацевтичните индустрии и асоциации (European Federation of Pharmaceutical Industries and Associations, EFPIA) (<https://www.efpia.eu/>) и спрямо кодексите на националните асоциации в рамките на EFPIA. Един от основополагащите принципи на Кодексите се отнася до оповестяването на трансфери на стойност до здравни специалисти (healthcare professionals, HCPs) и до здравни организации (healthcare organisations, HCOs).

Chugai все още няма установено присъствие във всички страни членки на EFPIA, но може да взаимодейства със HCPs и HCOs от страни, където няма установено присъствие. Независимо от това, Chugai продължава да спазва принципа на оповестяване и се стреми да прилага хармонизиран подход по отношение на оповестяването във всички страни на EFPIA.

При наличие на национално хранилище на данни, Chugai ще поиска разрешение за оповестяване чрез тази платформа, дори ако дружеството не разполага с физическа база в тази страна. Когато това не е възможно, Chugai ще оповестява разходите чрез своя европейски корпоративен уеб сайт: <https://www.chugai.eu/responsibility/transparency>

Chugai приветства въпроси относно всеки аспект на своята политика за оповестяване и подробна информация относно трансферите на стойност от Chugai до HCPs и HCOs.

Моля да изпращате всички въпроси на: disclosure@chugai-pharm.co.uk

Тази декларация е преведена на езиците на страните, в които са направени трансфери на стойност. Ще бъде предоставена също и по-подробна версия на английски език.



Izjava o metodologiji na
lokalnom jeziku
za
otkrivanje u EU

CHUGAI PHARMA EUROPE & UK LTD

IZJAVA O METODOLOGIJI

Chugai je čvrsto posvećen Kodeksu ponašanja Europske federacije farmaceutске industrije (European Federation of Pharmaceutical Industry Associations, EFPIA) (<https://www.efpia.eu/>) i kodeksima koji pripadaju nacionalnim udruženjima unutar EFPIA. Jedan od osnovnih principa Kodeksa je otkrivanje prijenosa vrijednosti zdravstvenim radnicima (healthcare professional, HCP) i zdravstvenim organizacijama (healthcare organisation, HCO).

Chugai još ne djeluje na stalnoj osnovi u svim zemljama EFPIA, međutim Chugai može komunicirati sa zdravstvenim radnicima i zdravstvenim organizacijama iz zemalja u kojima još nije stalno prisutan. Ipak, Chugai ostaje posvećen principu otkrivanja i traži primjenu harmoniziranog pristupa otkrivanju u svim zemljama EFPIA.

Gdje postoji nacionalni repozitorij, Chugai će tražiti dozvolu za otkrivanje na toj platformi, čak i ako tvrtka nema fizičko sjedište u toj zemlji. Gdje to nije moguće, Chugai će otkriti trošak na mrežnoj stranici svoje europske korporacije: <https://www.chugai.eu/responsibility/transparency>

Chugai pozdravlja pitanja o bilo kojem aspektu svoje politike otkrivanja i detaljima prijenosa vrijednosti od tvrtke Chugai do zdravstvenih radnika i zdravstvenih organizacija.

Molimo da sva pitanja uputite na: disclosure@chugai-pharm.co.uk

Ova je izjava prevedena na one nacionalne jezike u kojima su izvršeni bilo koji prijenosi vrijednosti. Također će biti dostupna značajnija verzija na engleskom jeziku.



Erklæring vedrørende
metodologi på lokale sprog
vedrørende
EU offentliggørelse

CHUGAI PHARMA EUROPE & UK LTD

ERKLÆRING VEDRØRENDE METODOLOGI

Chugai vil følge adfærdskodekset fra Den Europæiske Sammenslutning af Medicinalindustriforeninger (European Federation of Pharmaceutical Industry Associations (EFPIA)) (<https://www.efpia.eu/>) og adfærdskodekser fra nationale foreninger i EFPIA. Et af kerneprincipperne i kodekserne vedrører offentliggørelse af værdioverførsler til sundhedsfaglige personer (HCP'er) og sundhedsorganisationer (HCO'er).

Chugai har endnu ikke en fast base i alle EFPIA-lande, men Chugai kan interagere med HCP'er og HCO'er fra lande, hvor det ikke har en fast tilstedeværelse. Chugai vil imidlertid følge princippet vedrørende offentliggørelse og bestræber sig på at anvende en ensartet tilgang til offentliggørelse i alle EFPIA-lande.

Hvor der foreligger et nationalt register, vil Chugai søge om tilladelse til at offentliggøre på den platform, også selv om virksomheden ikke har en fysisk tilstedeværelse i det pågældende land. Hvor dette ikke er muligt, vil Chugai offentliggøre udgifter på dets europæiske hjemmeside: <https://www.chugai.eu/responsibility/transparency>

Chugai er åben for spørgsmål vedrørende alle aspekter omkring dets offentliggørelsespolitik samt detaljer vedrørende værdioverførsler fra Chugai til HCP'er og HCO'er.

Alle spørgsmål bedes sendt til: disclosure@chugai-pharm.co.uk

Denne erklæring er blevet oversat til de nationale sprog, hvor værdioverførsler har fundet sted. En mere fyldestgørende udgave vil også være tilgængelig på engelsk.



Заявление о методике на
местном языке
для
раскрытия информации в ЕС

CHUGAI PHARMA EUROPE & UK LTD

ЗАЯВЛЕНИЕ О МЕТОДИКЕ

Компания Chugai твердо придерживается Кодекса надлежащей практики Европейской федерации фармацевтической промышленности и ассоциаций (EFPIA) (<https://www.efpia.eu/>) а также кодексов национальных ассоциаций в рамках EFPIA. Одним из основных принципов Кодекса является раскрытие информации о передаче ценностей в пользу специалистов сферы здравоохранения (HCP) и организаций здравоохранения (HCO).

Компания Chugai еще не осуществляет свою деятельность во всех странах — членах EFPIA на постоянной основе, однако она может взаимодействовать со специалистами сферы здравоохранения (HCP) и организациями здравоохранения (HCO) из стран, в которых она не имеет постоянного присутствия. Тем не менее, компания Chugai сохраняет приверженность принципу раскрытия информации и стремится применять согласованный подход к раскрытию информации во всех странах — членах EFPIA.

В странах, где существует национальный репозиторий, компания Chugai будет стремиться получить разрешение на раскрытие информации на этой платформе, даже если у компании нет физического представительства в этой стране. Если это невозможно, компания Chugai будет раскрывать информацию о расходах на своем европейском корпоративном веб-сайте: <https://www.chugai.eu/responsibility/transparency>

Компания Chugai приветствует Ваши вопросы по любому аспекту политики раскрытия информации и по деталям передачи ценностей от компании Chugai в пользу специалистов сферы здравоохранения (HCP) и организаций здравоохранения (HCO).

Пожалуйста, направляйте Ваши вопросы по адресу: disclosure@chugai-pharm.co.uk

Это заявление было переведено на государственные языки тех стран, в которых были осуществлены какие-либо передачи ценностей. Будет также выпущена более содержательная версия на английском языке.



Déclaration de méthodologie dans la langue nationale pour divulgation dans l'UE

Bureau de conformité en matière de soins de santé

CHUGAI PHARMA EUROPE LTD

DECLARATION DE METHODOLOGIE

Chugai est fermement engagé à respecter les codes de conduite de la Fédération Européenne des Associations et Industries Pharmaceutiques (European Federation of Pharmaceutical Industries and Associations, EFPIA) (<https://www.efpia.eu/>) et ceux des associations nationales au sein de l'EFPIA. L'un des principes fondamentaux des codes est celui de la divulgation des transferts de valeurs au bénéfice de professionnels de santé et d'organismes de soins de santé.

Chugai n'a pas encore de siège établi dans tous les pays de l'EFPIA, mais peut interagir avec des professionnels de santé et des organismes de soins de santé dans les pays où elle n'a pas de présence fixe. Néanmoins, Chugai reste attachée au principe de la divulgation et entend appliquer une approche harmonisée à l'égard de la divulgation dans tous les pays de l'EFPIA.

Lorsqu'un référentiel national existe, Chugai demandera l'autorisation de divulguer sur cette plateforme, même si l'entreprise n'a pas de siège physique dans ce pays. Lorsque cela n'est pas possible, Chugai divulguera les dépenses sur son site web institutionnel européen : <https://www.chugai.eu/responsibility/transparency>

Chugai est à disposition pour répondre aux questions concernant tout aspect de sa politique de divulgation et les détails des transferts de valeurs de Chugai au bénéfice de professionnels de santé et d'organismes de soins de santé.

Veuillez adresser toute question à : disclosure@chugai-pharm.co.uk

Cette déclaration a été traduite dans les langues nationales où des transferts de valeurs ont été réalisés. Une version plus complète en anglais sera également disponible.



EU közzétételre vonatkozó helyi nyelvű módszertani nyilatkozat

CHUGAI PHARMA EUROPE & UK LTD

MÓDSZERTANI NYILATKOZAT

A Chugai szilárdan elkötelezte magát az Európai Gyógyszergyártók és Egyesületek Szövetsége (European Federation of Pharmaceutical Industry Associations, EFPIA) által kiadott etikai szabálygyűjtemény, az Eljárási Kódex (<https://www.efpia.eu/>) valamint az EFPIA szervezet tagjaként működő nemzeti szövetségek követelményeinek betartása iránt. A Kódex egyik legfontosabb alapelve az egészségügyi szakemberek (healthcare professionals, HCP-k) és az egészségügyi szervezetek (healthcare organisations, HCO-k) számára átadott értékek közzététele.

A Chugai még nem működtet telephelyet az EFPIA valamennyi országában, ám a vállalat együttműködést folytathat olyan országok HCP szakembereivel és HCO szervezeteivel, amelyben még nem rendelkezik képvisellel. A Chugai ettől függetlenül továbbra is elkötelezett a közzétételre vonatkozó alapelvek betartása iránt, és mindent megtesz annak érdekében, hogy az EFPIA által érintett valamennyi országban összehangolja a közzétételi módszert.

Abban az esetben, ha az adott ország saját gyűjteménnyel rendelkezik, a Chugai engedélyt fog szerezni ahhoz, hogy a közzétételt ezen a felületen tegye meg, még abban az esetben is, ha a vállalatnak nincs fizikai telephelye az adott országban. Amennyiben erre nincs lehetőség, a Chugai a pénzügyi adatokat európai vállalati weboldalán teszi közzé: <https://www.chugai.eu/responsibility/transparency>

A Chugai örömmel fogadja a közzétételi irányelv bármely vonatkozásával, valamint a Chugai részéről a HCP szakemberek és a HCO intézmények számára átadott értékekkel kapcsolatos kérdéseket.

Kérdéseit kérjük, a következő címre küldje: disclosure@chugai-pharm.co.uk

A jelen nyilatkozat minden olyan ország nemzeti nyelvén elolvasható, amelyben értékátadásra került sor. Angol nyelven egy még részletesebb változat is rendelkezésre áll.



Dichiarazione nella lingua locale relativa alla metodologia di divulgazione nell'UE

CHUGAI PHARMA EUROPE & UK LTD

DICHIARAZIONE DI METODOLOGIA

Chugai si impegna fermamente a rispettare i Codici di pratica della Federazione Europea delle Associazioni e delle Industrie Farmaceutiche (EFPIA) (<https://www.efpia.eu/>) e quelli delle associazioni nazionali all'interno dell'EFPIA. Uno dei principi fondamentali dei Codici riguarda la divulgazione relativa ai trasferimenti di beni ai professionisti sanitari (healthcare professional, HCP) e alle organizzazioni sanitarie (healthcare organisation, HCO).

Chugai non opera ancora con una base fissa in tutti i Paesi EFPIA; tuttavia può interagire con gli HCP e le HCO dei Paesi in cui non ha una presenza fissa. Ciononostante, Chugai si impegna a rispettare sempre il principio di divulgazione e cerca di applicare un approccio armonizzato alla divulgazione in tutti i Paesi EFPIA.

Laddove esista un archivio nazionale, Chugai cercherà di ottenere il permesso di divulgare le informazioni su tale piattaforma, anche se la società non ha una base fisica nel Paese in questione. Nel caso in cui ciò non sia possibile, Chugai divulgherà le spese sul proprio sito web aziendale europeo: <https://www.chugai.eu/responsibility/transparency>.

Chugai sarà lieta di rispondere a domande su qualsiasi aspetto relativo alla politica di divulgazione e in merito ai dettagli sui trasferimenti di beni da Chugai agli HCP e alle HCO.

La preghiamo di inviare qualsiasi domanda all'indirizzo: disclosure@chugai-pharm.co.uk.

La presente dichiarazione è stata tradotta nelle lingue nazionali dei Paesi in cui sono stati effettuati i trasferimenti di beni. Inoltre, sarà messa a disposizione una versione più sostanziale in inglese.



Oświadczenie w miejscowym języku dotyczące metodologii ujawniania informacji w UE

CHUGAI PHARMA EUROPE & UK LTD

OŚWIADCZENIE DOTYCZĄCE METODOLOGII

Firma Chugai zobowiązuje się ściśle przestrzegać Kodeksu Dobrych Praktyk Europejskiej Federacji Przemysłu i Stowarzyszeń Farmaceutycznych (European Federation of Pharmaceutical Industry Associations, EFPIA), (<https://www.efpia.eu/>) oraz praktyk stowarzyszeń krajowych należących do EFPIA. Jedną z nadrzędnych zasad Kodeksu jest ujawnianie informacji o transferach wartości majątkowych dokonywanych na rzecz pracowników służby zdrowia i organizacji działających w sektorze ochrony zdrowia.

Chugai nie prowadzi jeszcze działalności we wszystkich krajach stowarzyszonych w EFPIA, może jednak współpracować z pracownikami służby zdrowia i organizacjami działającymi w sektorze ochrony zdrowia z krajów, w których nie posiada stałego przedstawicielstwa. Chugai zobowiązuje się jednak do przestrzegania zasad dotyczących ujawniania informacji i pragnie zastosować zharmonizowane podejście do ujawniania informacji we wszystkich krajach stowarzyszonych w EFPIA.

Tam, gdzie istnieje krajowy depozyt, firma Chugai będzie ubiegała się o pozwolenie na ujawnianie informacji na tej platformie, nawet w przypadku gdy nie będzie miała stałego przedstawicielstwa w danym kraju. Jeśli nie będzie to możliwe, firma Chugai będzie ujawniać informacje o swoich wydatkach na europejskiej witrynie korporacji <https://www.chugai.eu/responsibility/transparency>

Chugai chętnie udzieli odpowiedzi na pytania dotyczące wszelkich aspektów jej procedur dotyczących ujawniania informacji oraz szczegółów transferów wartości majątkowych dokonywanych przez firmę na rzecz pracowników służby zdrowia i organizacji działających w sektorze ochrony zdrowia.

Wszelkie pytania prosimy kierować na adres disclosure@chugai-pharm.co.uk

Niniejsze oświadczenie zostało przetłumaczone na języki krajów, w których dokonano jakichkolwiek transferów wartości majątkowych. Dostępna będzie również bardziej rozszerzona wersja w języku angielskim.



Declarație privind
metodologia în limba locală
pentru
Divulgarea la nivelul UE

CHUGAI PHARMA EUROPE & UK LTD

DECLARAȚIE PRIVIND METODOLOGIA

Chugai respectă ferm Codurile de practică ale Federației Europene a Asociațiilor din cadrul Industriei Farmaceutice (European Federation of Pharmaceutical Industry Associations, EFPIA) (<https://www.efpia.eu/>) și pe cele ale asociațiilor naționale din cadrul EFPIA. Unul din principiile Codurilor este reprezentat de declararea transferurilor de valoare efectuate către profesioniști din domeniul sănătății (healthcare professionals, HCP) și către organizațiile din domeniul sănătății (healthcare organisations, HCO).

Chugai nu operează încă de la o bază fixă în toate țările EFPIA, însă Chugai poate interacționa cu HCP și HCO din țări în care nu deține o prezență fixă. Cu toate acestea, Chugai rămâne dedicată respectării principiului declarării și vizează aplicarea unei abordări armonizate privind declararea în toate țările EFPIA.

În cazurile în care există un registru național, Chugai va solicita permisiunea de divulgare pe platforma respectivă, chiar și în cazul în care compania nu are o bază fizică în țara respectivă. În cazurile în care acest lucru nu este posibil, Chugai va divulga cheltuielile pe site-ul său web corporativ european: <https://www.chugai.eu/responsibility/transparency>

Chugai consideră binevenite întrebările cu privire la orice aspect al politicii sale de divulgare și al detaliilor transferurilor de valoare efectuate de Chugai către HCP și HCO.

Vă rugăm să transmiteți orice întrebări la adresa: disclosure@chugai-pharm.co.uk

Această declarație a fost tradusă în limbile naționale aferente țărilor în care s-au efectuat transferuri de valoare. Va fi pusă de asemenea la dispoziție o versiune mai substanțială în limba engleză.



Declaración de Metodología en Lenguaje Local para Divulgación en la UE

CHUGAI PHARMA EUROPE & UK LTD

DECLARACIÓN DE METODOLOGÍA

Chugai está firmemente comprometida con los Códigos de Práctica de la Federación Europea de Asociaciones de la Industria Farmacéutica (EFPIA) (<https://www.efpia.eu/>) y con aquellos de las asociaciones nacionales en EFPIA. Uno de los principios clave de los Códigos es el de divulgación de las transferencias de valor a profesionales sanitarios (HCP) y organizaciones sanitarias (HCO).

Chugai no gestiona todavía una base fija en todos los países de EFPIA; no obstante, Chugai podrá interactuar con los HCP y las HCO desde los países en los que no tiene una presencia fija. Sin embargo, Chugai sigue comprometida con el principio de divulgación y trata de aplicar un enfoque armonizado a la divulgación en todos los países EFPIA.

Cuando exista un archivo nacional, Chugai solicitará permiso para divulgar en esa plataforma, incluso si la empresa no tiene una base física en ese país. Cuando esto no sea posible, Chugai divulgará el gasto en su sitio web corporativo europeo: <https://www.chugai.eu/responsibility/transparency>

Chugai agradece las preguntas sobre cualquier aspecto de su política de divulgación y los detalles de las transferencias de valor de Chugai a los HCP y las HCO.

Diríjase cualquier pregunta a: disclosure@chugai-pharm.co.uk

La presente declaración ha sido traducida a aquellos idiomas nacionales en los que se ha realizado cualquier transferencia de valor. Se pondrá también a disposición una versión más esencial en idioma inglés.



Metodbeskrivning på lokalt språk för EU-yppande

CHUGAI PHARMA EUROPE & UK LTD

METODBESKRIVNING

Chugai följer de praxiskoder som utfärdats av den europeiska branschorganisationen för läkemedelsföretag (European Federation of Pharmaceutical Industry Associations, EFPIA) (<https://www.efpia.eu/>) samt de praxiskoder som utfärdats av de nationella organisationerna inom EFPIA. En av kodernas kärnprinciper är att överföringar av värde till hälsovårdspersonal (healthcare professionals, HCPs) och hälsovårdsorganisationer (healthcare organisations, HCOs) skall yppas.

Chugai har ännu inte en fast bas i alla EFPIA-länder, men Chugai kan interagera med HCPs och HCOs från länder där det inte har en fast närvaro. Chugai följer principen om yppande under alla omständigheter och strävar efter att tillämpa en samstämmig metod för yppande i alla EFPIA-länder.

Om det finns en nationell plattform kommer Chugai att söka tillstånd för att lämna sitt yppande på denna, även om företaget inte har en fysisk närvaro i detta land. Då detta inte är möjligt kommer Chugai att yppa sina utgifter på företagets europeiska webbsida: <https://www.chugai.eu/responsibility/transparency>

Chugai välkomnar alla frågor avseende företagets yppandepolicy och ingående information om överföringar av värde från Chugai till HCPs och HCOs.

Vänliga skicka frågor till: disclosure@chugai-pharm.co.uk

Denna beskrivning har översatts till de nationella språken i de länder där överföringar av värde har gjorts. En mer utförlig engelsk version kommer också att göras tillgänglig.



AB Açıklaması
için
Yerel Dilde Metodoloji Beyanı

CHUGAI PHARMA EUROPE & UK LTD

METODOLOJİ BEYANI

Chugai, Avrupa İlaç Endüstrileri ve Birlikleri Federasyonu'nun (EFPIA) (<https://www.efpia.eu/>) ve EFPIA dahilindeki ulusal birliklerin Uygulama Kurallarına kati bir şekilde bağlıdır. Kuralların ana ilkelerinden biri, sağlık hizmetleri çalışanlarına (HCP'ler) ve sağlık hizmetleri kuruluşlarına (HCO'lar) değer aktarımlarının açıklanmasıdır.

Chugai henüz tüm EFPIA ülkelerinde sabit bir üste faaliyet göstermemektedir ancak Chugai sürekli olarak varlık göstermediği ülkelerden HCP'ler ve HCO'lar ile etkileşimde bulunabilir. Bununla beraber, Chugai, açıklama ilkesine bağlılığını korumakta ve tüm EFPIA ülkelerinde açıklamaya yönelik uyumlulaştırılmış bir yaklaşım uygulamaya çalışmaktadır.

Ulusal havuzların bulunduğu durumlarda, Chugai şirketin ilgili ülkede fiziksel bir üssü bulunmadığı zamanlarda dahi ilgili platformda açıklama yapma izni isteyecektir. Bunun mümkün olmadığı durumlarda, Chugai harcama açıklamalarını kurumsal web sitesinde yayınlacaktır: <https://www.chugai.eu/responsibility/transparency>

Chugai, açıklama politikasının herhangi bir yönü ve Chugai'dan HCP'ler ve HCO'lara yapılan değer aktarımları ile ilgili tüm soruları memnuniyetle yanıtlayacaktır.

Lütfen tüm sorularınızı şu adrese yönlendirin: disclosure@chugai-pharm.co.uk

Bu beyan, değer aktarımlarının yapıldığı bölgelerin yerel dillerine tercüme edilmiştir. İngilizce olarak çok daha kapsamlı bir sürüm sunulacaktır.



Заява місцевою мовою
про методіку
розкриття інформації в ЄС

CHUGAI PHARMA EUROPE & UK LTD

ЗАЯВА ПРО МЕТОДИКУ

Компанія Chugai твердо дотримується Кодексів галузевої практики Європейської федерації асоціацій фармацевтичної галузі (European Federation of Pharmaceutical Industry Associations, EFPIA) (<https://www.efpia.eu/>) і відповідних кодексів національних асоціацій, які входять до EFPIA. Один із центральних принципів Кодексів – розкриття даних про передачу цінності медичним працівникам (МП) і медичним організаціям (МО).

Компанія Chugai поки що не має постійної бази в усіх країнах EFPIA, хоча вона може взаємодіяти з МП і МО у країнах, де вона не має постійної присутності. Попри це компанія Chugai залишається відданою принципів розкриття і намагається застосовувати узгоджений підхід до розкриття в усіх країнах EFPIA.

Якщо в країні існує національна база даних, компанія Chugai намагатиметься отримати дозвіл на здійснення розкриття на цій платформі, навіть якщо компанія не має фізичної бази в цій країні. Де це неможливо, компанія Chugai розкриє витрати на своєму європейському корпоративному веб-сайті: <https://www.chugai.eu/responsibility/transparency>

Компанія Chugai заохочує запитання щодо будь-якого аспекту своєї політики розкриття та деталей передачі цінності від компанії до МП і МО.

Будь ласка, скеровуйте будь-які запитання на адресу: disclosure@chugai-pharm.co.uk

Ця заява перекладена на національні мови тих країн, де було здійснено будь-яку передачу цінності. Також буде представлено розширену версію англійською мовою.



Methodological Notes on Disclosure

CHUGAI PHARMA EUROPE & UK LTD

CONTENTS

Introduction	32
Definitions:	33
How we manager Transfers of Value	39
How we manage consent	39
How we manage Research and Development	40
Tax and VAT considerations	40
Links to Codes	41
Contacts	41

INTRODUCTION

Chugai frequently collaborates with health experts with a view to developing pragmatic solutions that will help patients across the UK and Ireland access highly innovative medicines and address the current challenges facing the healthcare sector.

Chugai has robust processes for engaging with Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs) which are subject to internal scrutiny by the appropriate functions. All engagements are planned in accordance with The Association of British Pharmaceutical Industry (ABPI) and Irish Pharmaceutical Healthcare Association (IPHA) Codes of Practice.

The ABPI and IPHA Codes of Practice require Chugai to disclose specific transfers of value to healthcare professionals (HCPs) and healthcare organisations (HCOs). In addition, and where required, such transfers of value (including direct payments) should be disclosed at a named individual level.

This requires companies to document and publicly disclose transfers of value made directly or indirectly to HCPs and HCOs. Each company providing transfers of value must publish a note summarising the methodology used in preparation of the disclosure and identifying each category of transfer of value (ToV).

Chugai is committed to ensuring that the relationship between the industry and HCPs, Other Relevant Decision Makers (ORDMs) and HCOs is better understood. Chugai welcomes this increased transparency and believes it is in the best interests of the pharmaceutical industry, the Irish and British healthcare section and ultimately patients. Chugai takes the principles of disclosure seriously and understands the balance between disclosure and privacy rights and will always respect both important elements.

This document outlines the methodology and definitions used by Chugai in relation to such disclosure. For further information please go to <https://www.abpi.org.uk/our-ethics/disclosure-uk/>.

DEFINITIONS:

Term	Definition
Methodological Notes	<p>These notes provide detail how Chugai manages disclosure and individual consent to disclose as companies manage these in different ways dependent upon the nature of the payments and business setup. The objective is to provide a narrative to allow the reader to understand that we take disclosure and consent seriously and strive to make the information as clear as possible and provide the information in the most accessible manner. Chugai welcomes any feedback to help improve these notes and the overall information provided (please contact disclosure@chugai-pharm.co.uk).</p>
Transfer(s) of Value (ToV):	<p>The term ‘transfer of value’ means a direct or indirect transfer of value, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development or sale of medicines. A direct transfer of value is one made directly by a company for the benefit of the recipient. An indirect transfer of value is one made by a third party on behalf of a company for the benefit of a recipient where the third party’s identity is known to, or can be identified by, the recipient. An indirect transfer of value could also be the cost of travel or accommodation incurred by the company for the HCP to complete work where the HCP has been contracted by the company (e.g. attending an advisory board meeting).</p> <p>Chugai (including Chugai Pharma Europe (CPE) and Chugai Pharma UK (CPU)) will disclose all ToV to HCPs and HCOs in accordance with its commitment to these Codes on Disclosure of all appropriate Transfers of Value.</p> <p>These payments will be disclosed via country-specific central repositories which will allow the reader to access all payments made by members of the pharmaceutical industry. Payments made to patient organisations will be disclosed separately on the Chugai Pharma Europe website (https://www.chugai.eu/responsibility/transparency/)</p>
Healthcare Organisation (HCO):	<p>Chugai regards HCOs as hospitals, universities, private medical groups and other places of work for HCPs treating patients or providing associated advice or management services related to the treatment of patients. In addition, all medical societies (national or local) and all “networks” of associations for HCPs are regarded as HCOs.</p> <p>Private companies such as medical education agencies, or suppliers of “temp” nurses, etc. are not typically regarded as HCOs, especially where the majority of employees are non-HCPs.</p>
Healthcare Professional (HCP)	<p>For the purposes of disclosure, Chugai regards all employees of a Health Care Provider as HCPs regardless of their professional status. In addition, Chugai regards all registered or qualified HCPs as within the scope of disclosure regardless of their status. Thus,</p>

	<p>retired HCPs fall within scope and academic staff who provide clinical services and support.</p> <p>Where HCPs are employed directly and exclusively by Chugai their salary and benefits are outside the scope of disclosure. Part-time employees will fall within the scope of disclosure for all payments made by the company, including salary.</p> <p>Note that HCPs have the right to opt out from individual disclosure (Refer to Data Privacy and Consent section).</p>
Language and Local Requirements	<p>The ABPI and IPHA Codes require disclosure to be available in the country where the HCP is registered to practice and presented in a manner which best allows the reader the opportunity to understand the nature of the relationship between the company, HCP/HCO and ToV. This includes the information being presented in a local language. Some Member States have developed central repositories where the public can access all ToV in one place. Chugai supports this practice and where data is being disclosed will provide financial support to manage this development. Where a Member State has adopted a legal framework relating to disclosure then the local Codes of Practice and legal requirements are strictly adhered to with the most stringent being a benchmark for general guidance.</p>
Fair Market Value	<p>Chugai usually compensate HCPs for their time when working with the company. The decision to not be paid is one made by the HCP. The payment rate is determined by a process known as Fair Market Value (FMV). This is an industry-wide standardised calculation which tells the company what an HCP would actually earn for their time in practice, based on their specific credentials and qualifications. Chugai uses this information to ensure each HCP's compensation is fair and reasonable for the amount of time necessary to provide the requested service. The fee provided by Chugai is a calculation based on preparation, disturbance (travel) and actual time costs. All arrangements and payments require internal approval which includes review by a compliance officer along with trained staff.</p>
Reporting Date	<p>There is an inevitable delay between the date on which a payment is approved within Chugai and the date on which the payment may be made. Chugai will disclose the details of the payment on the date the payment is processed. This may mean that some projects taking place at the end of one year will be disclosed as part of the next annual reporting period because the payment may not occur until the following year when the invoice has been received and settled. A ToV is paid only after the engagement has taken place.</p>
For how long are ToVs disclosed publicly	<p>The information disclosed remains in the public domain for at least three years from the time of disclosure and archived internally for at least 7 years in keeping with financial archive requirements.</p>
Currency	<p>Where payments were made in a currency other than local, the exchange rate will mean the exact equivalent in sterling will vary according to the date on which the conversion calculation was made. For general purposes, the conversion date should be regarded as</p>

	<p>the date on which the entry was made in the database. Readers should understand that the amounts disclosed in the local currency could therefore vary slightly from the exact amount paid in the local currency; variations will be greater if there have been significant movements in exchange rate during the reporting period. From 2017 Chugai uses a finance system that gives an automated currency conversion based on the date of payment. For payments made before 2017 Chugai calculated currency conversion based on an average rate over the year.</p>
<p>How we Maintain Accuracy of Beneficiary</p>	<p>Chugai use the OneKey system contracted from IQVIA (https://www.iqvia.com/locations/uk-and-ireland) to provide a comprehensive database on HCPs, HCOs and Patient Organisations. This ensures the highest accuracy of the data and reduces the risk of inaccurate disclosure. Chugai makes great effort to ensure the highest accuracy of data and takes any inaccuracy reported to the company seriously and will strive to resolve immediately. The maximum time for resolution is 28 days.</p> <p>Chugai has a policy to obtain the relevant OneKey ID prior to any work commencing to ensure all ToVs are disclosed accurately.</p>
<p>Sources of Payments</p>	<p>Most disclosed ToVs are made directly by Chugai to an HCP, HCO or Patient Organisation. Disclosed ToVs are also captured where payments are made by other parts of the Chugai Group (described as cross-border payments), R&D related payments made by contracted clinical research organisations (CROs) or external contracted agencies (e.g. travel agents). Chugai UK has an ongoing business partnership with Roche Products Ltd for several co-promotional activities. There are occasions where Roche may undertake activities but where Chugai makes the payment and visa versa. Both companies follow the principle that the company that made the payment is responsible for accurate disclosure and managing consent.</p>
<p>Cross-border Payments</p>	<p>Cross-border payments relate to payments made to an HCP or HCO where the HCP is registered in the UK or Ireland and where there is an organised event and/or where the organising company is based elsewhere. Such engagements are highly regulated at an internal level to be sure arrangements are keeping with regulations in the countries of the engagement, where the HCP is registered to practice and the country where the organising business is based. This includes travel, fees for services, venue, agenda and what materials are available to delegates and speakers, nature and content of the presentation, accommodation and subsistence.</p> <p>Cross border payments are disclosed in the country where the HCP is registered to practice. For engagements that relate to R&D then these disclosures are presented in aggregated format. For all other forms of engagement, the intention is to always disclose on a named individual basis once the HCP has provided written consent. Where this has not been granted then the payment is disclosed in an aggregated form.</p>

<p>Non-monetary Transfers of Value</p>	<p>Such ToV would be quantified on the cost of the apparatus provided (e.g. as part of a clinical trial) or calculated on an hourly basis determined by the Healthcare Compliance Office on a case by case basis and stated in any agreement.</p>
<p>Multi-year Projects</p>	<p>Chugai will usually engage with an HCP where there is an agreement per engagement. However, there may be occasion where the engagement is ongoing though for the purposes of consent and disclosure a contract will be no longer than that calendar year. Payments will be disclosed in accordance with the year the payment was made.</p> <p>Where projects run for several years Chugai will declare the amount paid relevant to the year in which each part of the payment was made. Thus, a project which spans 2 calendar years and includes several individual ToV during that time will have two associated disclosures; one for each calendar year showing the value of the transfer made in that specific calendar year.</p>
<p>Payments to a Charity</p>	<p>On occasion, an HCP who has provided a service to Chugai may ask for their fee to be paid to charity. Chugai does not allow this, and all payments are preferred to be made directly to the HCP. Instead the HCP is expected to settle tax costs and make any subsequent charitable payment directly of their own volition.</p>
<p>Payments to Healthcare Organisations for Services Provided by Individual HCPs</p>	<p>On occasion, an HCO will insist that any services provided by its HCP employees cannot be contracted with the individual HCP but must be a service contracted through the HCO.</p> <p>Since Chugai is contracting for the services of a named HCP, the fee received by the HCP will be disclosed under that HCP's entry. Any "administration fee" charged by the HCO will be disclosed as a fee for service to that organisation.</p> <p>If the HCP does not receive any additional payment for the service (e.g. because they are speaking at a meeting during normal working hours) then the full amount paid by Chugai will be disclosed against the HCO as a fee for service.</p>
<p>Private Companies and Associated Charities</p>	<p>Where an HCP runs a private company or partnership, charity, etc., for the purposes of their private income, any payments to that organisation will be regarded for disclosure purposes as a payment to the HCP directly.</p> <p>Similarly, organisations where most employees or contracted suppliers are comprised of HCPs, the full value of payments made to such organisations associated with the services of a named or identifiable individual will be regarded as if it was a direct payment to the HCP.</p>
<p>Payments to Third Party Organisations for Services Provided by Individual HCPs</p>	<p>Chugai regularly contracts with advertising agencies and PR agencies, etc., for services related to its business. On occasion, the work commissioned by Chugai might be contracted out to an individual HCP. Chugai policy is that all such services must be disclosed to Chugai by the contracted service agency. Chugai will disclose any payments made to the individual HCP by the service agency as if the payment had been made directly by Chugai to that HCP.</p>

Medical Education Grants to Independent Companies	<p>On occasion, Chugai is approached by independent companies to provide funding in relation to medical education projects. The rules related to Chugai's funding in these circumstances require that Chugai has no influence over the details of the project. Chugai would not know whether or which HCPs had been involved in such projects. As such, Chugai does not disclose ToV related to this type of project.</p>
Contributions to Meetings	<p>Chugai will disclose all payments made to medical associations, HCOs, etc. in relation to meetings. This includes direct funding such as sponsorship fees or the right to erect an exhibition stand, costs for staff to attend as delegates and indirect support such as providing a logistics agency or subsidising the cost of registration fees. The details are provided in the relevant line entry.</p> <p>The cost of any sponsorship related directly to food is outside the scope of disclosure unless this is a local code requirement.</p> <p>All costs associated with meetings run solely by Chugai are outside the scope of disclosure except for fees paid to individual HCPs providing services as speakers or travel reimbursement for speakers or delegates. Such payments are disclosed.</p>
Sponsorship for HCPs to Attend Medical Meetings	<p>Chugai proudly supports the attendance of HCPs at those medical meetings where there is evidence that the HCP will gain knowledge that will improve or maintain patient care. Chugai will disclose the associated ToV against the individual attendee. Where costs are not individually itemised (e.g. the cost of a bus transferring a group of HCPs from an airport to a conference venue), the total cost will be split equally between all those receiving the benefit.</p> <p>Costs declared include transport, registration fees and accommodation. Costs related to subsistence are not declared but the meal costs are regulated by strict industry guidelines.</p>
Grants to HCOs for Support to Attend Medical Meetings	<p>On occasion, Chugai is asked by an HCO to provide a financial grant to assist its employees to attend medical meetings. Where the payment is associated with named individuals, the disclosure is made as if the money was transferred directly to the named HCP. Where Chugai is not aware of the names of the HCPs receiving the support, the grant is declared against the named HCO.</p>
Donations	<p>A donation is defined as a payment where there is no obligation on the part of the receiver and as such is a free contribution. Such donations cannot be given to a HCP as this would be considered a potential breach of any local anti-bribery laws. Donations can only be provided to HCOs and patient organisations and in these situations there is mandatory requirement for an approved agreement that is signed by both parties on the basis that both parties will publicly disclose the donation. Such donations to HCOs are disclosed on the central portal. Such donations to patient organisations are disclosed on the company website.</p>

<p>Patient Organisations</p>	<p>Patient Organisations are providers of essential support and information to those living with medical conditions, as well as their families and carers. Working with these valued organisations allows Chugai to support their efforts with vital resources and is highly regulated. Chugai takes its relationships with Patient Organisations very seriously and is committed to ensuring any interaction is justifiable and ethical. For all types of engagements there will be a fully executed contract which is approved internally through a stringent review process. All payments are disclosed on Chugai’s website no later than 30th June for payments made the previous year. Chugai will provide an explanation to the payment and a calculation for this payment as a percentage of the income for the Patient Organisation as a whole.</p> <p>If the money is associated with an individual HCP working with the Patient Organisation, then the funding will be disclosed twice – the money for the HCP will be disclosed on the ABPI or IPHA disclosure platform against the individual HCP; the overall project will be disclosed on Chugai’s website against the Patient Organisation entry and will include all payments to Patient Organisations in the EU.</p>
<p>Joint Working</p>	<p>The Dept of Health defines Joint Working between the NHS and the pharmaceutical industry as situations where, for the benefit of patients, one or more pharmaceutical companies and the NHS pool skills, experience and/or resources for the joint development and implantation of patient centered projects and share a commitment to successful delivery. Chugai disclose all payments relating to Joint Working.</p>
<p>Chugai Partners</p>	<p>As an independently listed company Chugai discloses all payments made directly from Chugai bank accounts and listed in the company records as part of its normal business operations.</p> <p>Chugai does not disclose payments made by its shareholders or other stakeholders whether those be individuals or organisations.</p>
<p>Co-marketing Projects</p>	<p>Where Chugai jointly markets a product with another pharmaceutical company, Chugai will only declare those payments made directly from Chugai bank accounts and listed in the company records as part of its normal business operations. ToV made by its co-marketing partners will be disclosed separately by those organisations. This information will be stated on Chugai’s website and a link provided to the business partner.</p>
<p>Distributor Projects</p>	<p>Chugai is a marketing distributor for products where the Market Authorisation Holder is a business partner based in another country. Chugai will only declare those payments made directly from Chugai bank accounts and listed in the company records as part of its normal business operations. ToV made by the Marketing Authorisation Holder will be disclosed separately by those organisations</p>
<p>If the information disclosed is challenged</p>	<p>Chugai takes accurate disclosure seriously. Any challenge to the information disclosed should be managed in writing to disclosure@chugai-pharm.co.uk. We will contact you and investigate the matter and amend any information as soon as possible. All necessary changes must be made to the public platform within 28 days, but we will aim to</p>

	<p>complete this much quicker depending upon the nature and complexity of the information.</p> <p>If you feel the information provided could be presented in a different format then please contact the company as we welcome the opportunity to improve transparency.</p>
<p>If a member of the public wish for further information</p>	<p>Chugai will provide as much information that is possible within the confines of data privacy and business confidentiality.</p>

HOW WE MANAGE TRANSFERS OF VALUE

Data is collected, recognised and reported using a commercially available database which was customised to Chugai’s organisational requirements. This system is used by Chugai to track payments made to all UK HCPs. ToVs are then reconciled against our financial system which identifies and flags relevant vendors.

Payments made to patient organisations will be disclosed separately on the Chugai Pharma UK website (<https://www.chugai.eu/responsibility/transparency/>).

HOW WE MANAGE CONSENT

Chugai is an ethical pharmaceutical company and we are required to comply with the relevant laws, regulations and applicable industry codes of practice governing our interactions with HCPs and HCOs, including but not limited to The General Data Protection Regulation 2016/679. Chugai is registered with the Information Commissioners Office as a data controller and appointed an external data processor for the purposes for complying with its financial transparency obligations under the APBI Code of Practice.

To legally disclose ToV data on an individual basis Chugai has obtained consent from HCPs except where a local law overrides the interests of secrecy the principles of data protection. Chugai has made every effort to secure and retain a record of the necessary permissions.

Where permission has not been obtained or where the individual HCP has refused permission, Chugai has declared the total spend as an aggregate figure as a separate line entry within the relevant disclosure category.

At the time of disclosure if consent has not been given by a UK HCP, the related ToVs will be included in the Chugai aggregated total.

Chugai allows partial disclosure. A UK HCP may consent to disclosure of sponsorship payments and decline to consent consultant payments. In this case the sponsorship ToVs would be disclosed on an individual basis and the consultancy ToVs will be disclosed in the aggregate (non-identifiable format).

Chugai fully supports the concepts of transparency and privacy. Information disclosed must remain in the public domain for at least three years from the time of disclosure and Chugai will document all disclosures and retain the records for at least five years after the end of the calendar year to which they relate. Situations can be challenging for disclosure, but Chugai is committed to maintaining full

transparency and balance data privacy wishes and sensitivities. Examples are as following but not limited to:

- If an HCP chooses to withdraw consent for an engagement at any time, Chugai has decided that the company will not change its relationship with the HCP in those circumstances where consent is not given or subsequently withdrawn in the spirit that consent should be freely given. This will not be the case in those countries where local laws supersede data protection rights.
- In the situation where an HCP received a payment from Chugai and subsequently dies and this information is known to the company then the payment is not disclosed or is removed.
- In the situation where an HCP retires from clinical practice and no longer maintains a membership to a body regulating practice then the payment will be disclosed except where IQVIA remove the HCP from the OneKey database when the payment is then removed.
- In the situation where an HCP receives a payment and provides consent for disclosure but then subsequently changes their name (e.g. following marriage) then if Chugai is made aware of this change then will amend the payment details to the new name if available in the OneKey database.

HOW WE MANAGE RESEARCH AND DEVELOPMENT

All payments to an HCP, HCO and patient organisations relating to research and development are disclosed as aggregate figures in accordance with local Codes of Practice.

Items included:

- Pre-clinical research and clinical research (includes Investigator Sponsored Research (ISR))
- Non-interventional Studies
- Advisory Boards and consultancy services in relation to clinical research
- Real world data studies and Health Outcomes research
- Fees for service to HCPs, ORDMS and HCOs in relation to study sites (including where these fees have been made by CRO on behalf of Roche)
- Travel and accommodation in relation to a fee for service contract
- Items not included
- Overhead cost (including CRO fees)
- Materials (such as study medication/injections/kits)

It is common practice for a pharmaceutical company to engage a clinical research organisation (CRO) to manage specific research projects and clinical trials. In these circumstances the CRO may make payments to HCPs and HCOs on behalf of Chugai. Such indirect payments are captured on a quarterly basis and provided to Chugai or processed through a business partner, Roche and subsequently disclosed by Chugai.

TAX AND VAT CONSIDERATIONS

It is the responsibility of the receiving HCP to settle local tax requirements. The contract for each engagement should be agreed and signed by both parties prior to any work being undertaken and there is a clear statement regarding tax payment responsibilities. Where a payment has been made to a HCO or third party vendor then where VAT has been included this has been settled by Chugai and where this

has occurred this has been highlighted in the disclosure per line. There are occasions where VAT is added as part of an invoice but was not stated in the fully executed Agreement. Chugai may need to settle VAT as a separate and subsequent payment and in that situation, Chugai will manually add the VAT costs to the information disclosed.

LINK TO ABPI CODE

<https://www.pmcpa.org.uk/the-code/>

LINK TO ABPI DISCLOSURE PORTAL

<https://www.abpi.org.uk/our-ethics/disclosure-uk/>

LINK TO IPHA CODE AND SUPPORTING DOCUMENTS

<https://www.ipha.ie/publications-submissions/ipha-codes/>

LINK TO IPHA DISCLOSURE PORTAL

<https://www.transferofvalue.ie/>

LINK TO EFPIA CODE

<https://www.efpia.eu/relationships-code/the-efpia-code/>

CONTACTS

Chugai welcomes the opportunity to discuss the principles of transparency and can be contacted in the email below. However, Chugai is unable to discuss detail relating to specific payments.

Healthcare Compliance Team
Chugai Pharma Europe

For further information, please contact:

disclosure@chugai-pharm.co.uk

+44 208 9875600