



# **Transparency Declaration**

-

## **Disclosure of Payments Made by Chugai Across Europe in 2022**

*Published June 2023*

**Chugai Pharma Europe Ltd.**

# Introduction and Background

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 Code<sup>1</sup> 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)<sup>2</sup>.

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/>) 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)<sup>3</sup> and the Irish Pharmaceutical Healthcare Association (IPHA)<sup>4</sup> 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 Mediciens<sup>5</sup>.

- Chugai Pharma Germany disclose in accordance with the Code of Conduct of the members of Verein Arzneimittel und Kooperation im Gesundheitswesen e.V. (“AKG”)<sup>6</sup>.
- Chugai Pharmaceutical Co. Ltd, Japan disclose in accordance with The Japan Pharmaceutical Manufacturers Association (JPMA) Code of Practice<sup>7</sup>.
- Payments made in the United States are disclose in accordance with The Physician Financial Transparency Report (‘Sunshine Act’) managed by Genentech<sup>8</sup>.

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 limitations<sup>9</sup>. 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.

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, 2022 to Dec 31st, 2022 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).

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.

Please note that currency conversion rates may result in disclosed figures being slightly different. To discuss anything further please contact [disclosure@chugai-pharm.co.uk](mailto:disclosure@chugai-pharm.co.uk)

Head of Compliance

Chugai Pharma Europe Ltd

References:

1. EFPIA Code on Disclosure on Transfers of Value to Pharmaceutical Companies to Healthcare Professionals and Healthcare Organisations ([www.efpia.eu/relationships-code/disclosure-of-payments/](http://www.efpia.eu/relationships-code/disclosure-of-payments/))
2. [www.eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32016R0679&qid=1656599006528](http://www.eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32016R0679&qid=1656599006528)
3. [www.abpi.org.uk/reputation/disclosure-uk/](http://www.abpi.org.uk/reputation/disclosure-uk/)
4. [www.transferofvalue.ie/](http://www.transferofvalue.ie/)
5. [www.transparence.sante.gouv.fr/flow/main?execution=e2s1](http://www.transparence.sante.gouv.fr/flow/main?execution=e2s1)
6. [www.ak-gesundheitswesen.de/?cn-reloaded=1](http://www.ak-gesundheitswesen.de/?cn-reloaded=1)
7. [www.jpma.or.jp/english/](http://www.jpma.or.jp/english/)
8. [www.gene.com](http://www.gene.com)
9. [www.efpia.eu/relationships-code/national-codes/](http://www.efpia.eu/relationships-code/national-codes/)

## Payments Made in 2022

Payments were made to Healthcare Professionals and/or Healthcare Organisations in the below countries.

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

Click on 'Methodological notes' for full details of Chugai's disclosure methodology.

European Member States where Payments were made in 2022	Link to Chugai's methodological notes
<a href="#">Denmark</a>	<a href="#">Methodological notes</a>
<a href="#">Finland</a>	
<a href="#">Italy</a>	
<a href="#">Norway</a>	
<a href="#">Spain</a>	
<a href="#">Switzerland</a>	

# Denmark

Date range: 2022 Full\_Year

Date of publication: 27-06-2023 20:20

	Full Name  (article 3)	HCPs: City of Principal Practice HCPs: City where registered  (article 3)	Country of Principal Practice  (article 3)	Principal Practice Address  (article 3)	Unique country identifier (optional)	Donations and Grants to HCOs (article 15)	Contribution to costs of Events (article 13)			Fee for service and consultancy(article 16)		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 consultancy contract, including travel & accommodation relevant to the	
INDIVIDUAL NAMED DISCLOSURE - one line per HCP (i.e. all transfers of value (ToVs) / annum for an individual HCP will be summed up; itemization should be available for the individual Recipient or public authorities' consultation only)												
HCPs						N/A	N/A	0	0	0	0	0
OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons												
HCPs	Aggregate amount attributed to transfers of value to such Recipients-article 10					N/A	N/A	0	0	10500	0	10500
HCPs	Number of Recipients in aggregate disclosure					0	0	0	0	1	0	1
HCPs	% of the number of Recipients included in the aggregate disclosure in the total number of Recipients disclosed -article 10					0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	N/A
INDIVIDUAL NAMED DISCLOSURE - one line per HCO (i.e. all ToVs / annum for an individual HCO will be summed up; itemization should be available for the individual Recipient or public authorities' consultation only)												
HCOs						0	0	0	0	0	0	0
OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons												
HCOs	Aggregate amount attributed to transfers of value to such Recipients-article 10					0	0	0	0	0	0	0
HCOs	Number of Recipients in aggregate disclosure					0	0	0	0	0	0	0
HCOs	% of the number of Recipients included in the aggregate disclosure in the total number of Recipients disclosed -article 10					0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	N/A
						Total Disclosure						
R&D	Transfers of Value re Research & Development as defined											0

# Finland

Date range: 2022 Full\_Year

Date of publication: 27-06-2023 20:20

	Full Name	HCPs: City of Principal Practice HCPs: City where registered	Country of Principal Practice	Principal Practice Address	Unique country identifier (optional)	Donations and Grants to HCOs (article 15)	Contribution to costs of Events (article 13)			Fee for service and consultancy(article 16)		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 consultancy contract, including travel & accommodation relevant to the		
(article 3)	(article 3)	(article 3)	(article 3)	(article 3)									
INDIVIDUAL NAMED DISCLOSURE - one line per HCP (i.e. all transfers of value (ToVs) / annum for an individual HCP will be summed up; itemization should be available for the individual Recipient or public authorities' consultation only)													
HCPs	Dr Jussi Koivunen	Oulu	Finland	Kajaanintie 50, Oulu		N/A	N/A	0	0	1000	0	1000	
OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons													
HCPs	Aggregate amount attributed to transfers of value to such Recipients-article 10					N/A	N/A	0	0	0	0	0	
HCPs	Number of Recipients in aggregate disclosure					0	0	0	0	0	0	0	
HCPs	% of the number of Recipients included in the aggregate disclosure in the total number of Recipients disclosed -article 10					0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	N/A	
INDIVIDUAL NAMED DISCLOSURE - one line per HCO (i.e. all ToVs / annum for an individual HCO will be summed up; itemization should be available for the individual Recipient or public authorities' consultation only)													
HCOs						0	0	0	0	0	0	0	
OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons													
HCOs	Aggregate amount attributed to transfers of value to such Recipients-article 10					0	0	0	0	0	0	0	
HCOs	Number of Recipients in aggregate disclosure					0	0	0	0	0	0	0	
HCOs	% of the number of Recipients included in the aggregate disclosure in the total number of Recipients disclosed -article 10					0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	N/A	
Total Disclosure													
R&D	Transfers of Value re Research & Development as defined											0	0



ALLEGATO 1 Data di pubblicazione: 27/06/2023												
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 e 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 5.6 a 5.7 CD	(Modulo 1CE) Allegato 2(CD)	(Art. 3 CE) (da Punto 5.6 a 5.7CD)	(Art. 3CE) (Punto 5.6, lettera a CD)	(Art. 3.01.1.a CE) (Punto 5.6, lettera a LU)	Sponsorship agreements with HCOs/third parties appointed by HCOs to manage an Event Accordi di sponsorizzazione con organizzazioni sanitarie/soggetti terzi nominati da organizzazioni sanitarie per la realizzazione di eventi	Registration fees Quote di iscrizione	Travel & Accomodation 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		
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 ciascuna org												
						0	0	0	0	0	0	0
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)												
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 5.5 CD												
Number of Recipients in aggregate disclosure - Art. 3.02 CE Numero dei Destinatari i cui dati sono pubblicati in forma aggregata - Punto 5.5 CD					Non Applicable	Non Applicable	0	0	1000	0	1000	
% 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 5.5 CD					Non Applicable	Non Applicable	0	0	1	0	1	
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 org												
						0	0	0	0	0	0	
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)												
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 5.5 CD												
Number of Recipients in aggregate disclosure - Art. 3.02 CE Numero dei Destinatari i cui dati sono pubblicati in forma aggregata - Punto 5.5 CD					Non Applicable	Non Applicable	0	0	1000	0	1000	
% 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 5.5 CD					Non Applicable	Non Applicable	0	0	1	0	1	
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 org												
						0	0	0	0	0	0	
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												
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												
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 1CE Trasferimenti di valore per Ricerca&Sviluppo come da definizione - Punto 5.8 e 5.9 e Allegato 2 CD										1000	

# Norway

EFPIA TEMPLATE - NORSK VERSJON											Publikasjonsdato: 27-06-2023 21:06	
											Rapporteringsvaluta:	
	Fullstendig navn	Helse-personell: Hovedpraksisens sted Helse-organisasjoner: Registreringssted	Hovedpraksisens land	Hovedpraksisens adresse	Entydig landsidentifikator VALGFRITT	Gaver og donasjoner til helseorganisasjoner (Art. 3.01.1.a)	Bidrag til arrangementskostnader (125 §/1.b)			Service- og konsulentonorar (125 §/1.c)		SUM VALGFRITT
	(Art. 1.01)	(Art. 3)	(Vedlegg 1)	(Art. 3)	(Art. 3)		Sponsoravtaler med helse-organisasjoner/ tredjeparter utpekt/lengasjert av helse-organisasjon til å lede et	Påmeldingsavgifter	Reise og overnatting	Honorarer	Tilknyttede utgifter avtalt i kontrakten om service- eller konsulentonorarer, herunder reise og overnatting i tilknytning til kontrakten	
Helsepersonell	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	
Helsepersonell	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											
	% av antall samlet offentliggjorte mottagere i totalt antall offentliggjorte mottagere - Art 3.02											
Helseorganisasjoner	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	
Helseorganisasjoner	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											
	% av antall samlet offentliggjorte mottagere i totalt antall offentliggjorte mottagere - Art 3.02											
Forskning og utvikling	SAMLET OFFENTLIGGJØRING											
	Verdioverføringer i forbindelse med forskning og utvikling etter nærmere definisjon - Artikkel 3.04 og vedlegg 1											
	96111.98											

# Spain

EFPIA Report										
Fecha de Publicación: 27-06-2023 21:15										
	Nombre Completo (Art 18.3)	Ciudad de ejercicio profesional (Art 18.3)	DNI / CIF (Art 18.3)	Donaciones (Art.18.3.1.a)	"Actividades formativas y reuniones científico-profesionales (Art. 18.3.1.b & 18.3.2.a)"			"Prestación de servicios (Art.18.3.1. c & 18.3.2.b)"		Investigación y Desarrollo (Art 18.6)
					Colaboraciones / Patrocinios con OS / Terceros asignados por OS para la gestión de eventos	Cuotas de inscripción	Desplazamiento y alojamiento	Honorarios	Gastos relacionados	
<b>PUBLICACIÓN NOMINATIVA INDIVIDUAL</b>										
HCP-s	Dr Guillermo Sanz Santillana	Hospital Universitario La Fe		0	0	0	0	2000	0	No aplica
	Dr Miguel Angel Canales Albendea	Hospital Universitario La Paz		0	0	0	0	2000	0	No aplica
<b>INFORMACIÓN NO INCLUIDA ARRIBA: Información que por razones legales no puede publicarse de forma individual</b>										
HCP-s	Importe agregado imputable a las Transferencias de Valor realizadas a PS -Artículo 18.4			0	0	0	0	0	0	No aplica
	Número de PS cuya información se publica en agregado - Artículo 18.4			0	0					No aplica
	% que representan sobre el total de PS que han recibido Transferencias de Valor - Artículo 18.4			0	0					No aplica
<b>PUBLICACIÓN NOMINATIVA INDIVIDUAL</b>										
HCO-s				0	0	0	0	0	0	No aplica
<b>AGGREGATE DISCLOSURE</b>										
R&D										800

# Switzerland

DATA DISCLOSURE FORM											
										Date of publication: 27-06-2023 21:36	
										Reporting Currency:	
	Full name	HCPs: City of Principal Practice HCOs: city where registered	Country of Principal Practice	Principal Practice Address	Donations and Grants to HCOs	Contribution to costs of Events			Fee for service and consultancy		TOTAL
						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	
<b>INDIVIDUAL NAMED DISCLOSURE FOR HEALTHCARE PROFESSIONALS [one row per HCP, with all transfers of value for the reporting period summed up]</b>											
HCP-s					0	0	0	0	0	0	0
<b>OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons</b>											
HCP-s	Aggregate amount attributable to transfers of value to such Recipients				0	0	0	180.77	2400	0	2580.77
	Number of Recipients in aggregate disclosure						0	1	1	0	1
	% of the number of recipients included in the aggregate disclosure in the total number of recipients disclosed						0	100%	100%	0	100%
<b>INDIVIDUAL NAMED DISCLOSURE FOR HEALTHCARE INSTITUTIONS [one row per HCI, with all transfers of value for the reporting period summed up]</b>											
HCO-s					0	0	0	0	0	0	0
<b>OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons</b>											
HCO-s	Aggregate amount attributable to transfers of value to such Recipients				0	0	0	0	0	0	0
	Number of Recipients in aggregate disclosure				0	0	0	0	0	0	0
	% of the number of recipients included in the aggregate disclosure in the total number of recipients disclosed				0	0	0	0	0	0	0
<b>AGGREGATE DISCLOSURE FOR RESEARCH &amp; DEVELOPMENT</b>											
R&D	Transfers of Value Research & Development as defined										
<b>TOTAL AMOUNT</b>											
TOTAL	Total amount of Transfers of Value paid to individual HCPs, HCOs and for Research & Development as defined										0