



Transparency Declaration

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Disclosure of Payments Made by Chugai Across Europe in 2024

Published June 2025

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 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/relationshipscode/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)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 Transparence Sante ⁵.
- 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 discloses 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 an 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.

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 2024 to Dec 31st 2024 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

Healthcare Compliance Lead
Chugai Pharma Europe Ltd

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/>)
2. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32016R0679&qid=1719343340075>
3. www.abpi.org.uk/reputation/disclosure-uk/
4. www.transferofvalue.ie/
5. <https://www.transparence.sante.gouv.fr/pages/accueil/>
6. <https://www.ak-gesundheitswesen.de/?cn-reloaded=1>
7. <https://www.jpma.or.jp/english/index.html>
8. <https://www.gene.com/>
9. <https://www.efpia.eu/relationships-code/national-codes/>

Payments Made in 2024

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 2024	Link to Chugai’s methodological notes
Austria	Methodological notes
Belgium	
Czech Republic	
Denmark	
Italy	
Netherlands	
Norway	
Poland	
Romania	
Spain	
Sweden	
Switzerland	

Austria

DISCLOSURE OF PAYMENTS TO HEALTHCARE PROFESSIONALS (HCPs), OTHER RELEVANT DECISION MAKERS (ORDMs) AND HEALTHCARE ORGANISATIONS (HCOs)																				Date of publication: 30.06.2025							
2024 ABPI CODE OF PRACTICE (Clause 28)																											
Full Name					HCPs/ORDMs: City of Principal Practice HCOs: city where registered	Country of Principal Practice	Principal Practice Address					Unique country local identifier OPTIONAL (Note 3)	Collaborative Working (which includes Joint Working) (Clauses 20 & 28)	Donations and Grants to HCOs (Clauses 23 & 28)	Contribution to costs of Events (Clauses 10 & 28)			Contracted Services (Clauses 24 & 28)			Blank Column (Clause X)		TOTAL				
(Clause 28)					(Clause 28)	(Clause 28)	(Clause 28)					(Clause 28)			Sponsorship agreements with HCOs / third party organisations appointed by HCOs to manage an	Registrati on Fees	Travel & Accommodation	Fees	Expenses		Blank Column (Clause X)	Blank Column (Clause X)					
Title	First Name	Initial	Last Name	Speciality	Role	HCPs/ORDMs: City of Principal Practice HCOs: city where registered	Country of Principal Practice	Institution Name	Location	Address Line 1	Address Line 2	Post Code	Email	Local Register ID or Third Party Database ID													
INDIVIDUAL	HCPs and ORDMs	INDIVIDUAL NAMED DISCLOSURE - one line per HCP/ORDM (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 - Template & Clause 28														N/A	N/A	N/A	N/A	0	0	2,650.00	0				2,650.00
		Number of Recipients in aggregate disclosure - Template & Clause 28														N/A	N/A	N/A	N/A	0	0	1	0				1
		Number of Recipients disclosed in aggregate as a % of all Recipients (individual & aggregate disclosures) - Clause 28														N/A	N/A	N/A	N/A	0	0	100%	0				100%
	HCOs	INDIVIDUAL NAMED DISCLOSURE - one line per HCO (i.e. all transfers of value during a year for an individual HCP will be summed up: itemization should be available for the																									
		Conference on "Advances in Targeted Therapies" Vienna Austria Waehringer Guertel 18-20 A-1090 Vienna, Austria																									
																50,000.00									50,000.00		
		OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons Clause 1.8 supplementary information																									
		Aggregate amount attributable to transfers of value to such Recipients - Template & Clause 28.5														N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A
Number of Recipients in aggregate disclosure - Template & Clause 28.5														N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A		
Number of Recipients disclosed in aggregate as a % of all Recipients (individual & aggregate disclosures) - Clause 28.5														N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A		
AGGREGATE	Research and Development	AGGREGATE DISCLOSURE																									
		Transfers of Value re: Research & Development as defined Clause 1.20																			0			N/A			

Belgium

DISCLOSURE OF PAYMENTS TO HEALTHCARE PROFESSIONALS (HCPs), OTHER RELEVANT DECISION MAKERS (ORDMs) AND HEALTHCARE ORGANISATIONS (HCOs)																				Date of publication: 30.06.2025							
Full Name						HCPs/ORDMs: City of Principal Practice HCOs: city where registered	Country of Principal Practice	Principal Practice Address						Unique country local identifier OPTIONAL (Note 3)	Collaborative Working (which includes Joint Working) (Clauses 20 & 28)		Donations and Grants to HCOs (Clauses 23 & 28)	Contribution to costs of Events (Clauses 10 & 28)			Contracted Services (Clauses 24 & 28)		Blank Column (Clause X)		TOTAL		
(Clause 28)						(Clause 28)	(Clause 28)	(Clause 28)						(Clause 28)								Blank Column (Clause X)	Blank Column (Clause X)				
Title	First Name	Initial	Last Name	Speciality	Role	HCPs/ORDMs: City of Principal Practice HCOs: city where	Country of Principal Practice	Institution Name	Location	Address Line 1	Address Line 2	Post Code	Email	Local Register ID or Third Party Database ID													
<div>INDIVIDUAL</div> <div> <div> <div>HCPs and ORDMs</div> <div> <div>INDIVIDUAL NAMED DISCLOSURE - one line per HCP/ORDM (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)</div> <div>OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons</div> </div> </div> <div> <div>Aggregate amount attributable to transfers of value to such Recipients - Template & Clause 28</div> <div>Number of Recipients in aggregate disclosure - Template & Clause 28</div> <div>Number of Recipients disclosed in aggregate as a % of all Recipients (individual & aggregate disclosures) - Clause 28</div> </div> </div> <div> <div>HCOs</div> <div> <div>(Clause 28)</div> <div>OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons Clause 1.8 supplementary information</div> </div> <div> <div>Aggregate amount attributable to transfers of value to such Recipients - Template & Clause 28.5</div> <div>Number of Recipients in aggregate disclosure - Template & Clause 28.5</div> <div>Number of Recipients disclosed in aggregate as a % of all Recipients (individual & aggregate disclosures) - Clause 28.5</div> </div> </div>																											
<div>AGGREGATE</div> <div> <div>Research and Development</div> <div> <div>AGGREGATE DISCLOSURE</div> <div>Transfers of Value re: Research & Development as defined Clause 1.20</div> </div> </div>																											

Czech Republic

DISCLOSURE OF PAYMENTS TO HEALTHCARE PROFESSIONALS (HCPs), OTHER RELEVANT DECISION MAKERS (ORDMs) AND HEALTHCARE ORGANISATIONS (HCOs)																				Date of publication: 30.06.2025									
Full Name						HCPs/ORDMs: City of Principal Practice HCOs: city where registered	Country of Principal Practice	Principal Practice Address						Unique country local identifier OPTIONAL (Note 3)	Collaborative Working (which includes Joint Working) (Clauses 20 & 28)	Donations and Grants to HCOs (Clauses 23 & 28)	Contribution to costs of Events (Clauses 10 & 28)			Contracted Services (Clauses 24 & 28)				Blank Column (Clause X)		TOTAL			
(Clause 28)						(Clause 28)	(Clause 28)	(Clause 28)						(Clause 28)						Fees	Expenses			Blank Column (Clause X)	Blank Column (Clause X)				
Title	First Name	Initial	Last Name	Speciality	Role	HCPs/ORDMs: City of Principal Practice HCOs: city where registered	Country of Principal Practice	Institution Name	Location	Address Line 1	Address Line 2	Post Code	Email	Local Register ID or Third Party Database						Registration Fees	Travel & Accommodation								
INDIVIDUAL NAMED DISCLOSURE - one line per HCP/ORDM (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 - Template & Clause 28															N/A	N/A	N/A	N/A	0	0	0	0				0			
Number of Recipients in aggregate disclosure - Template & Clause 28															N/A	N/A	N/A	N/A	0	0	0	0				0			
Number of Recipients disclosed in aggregate as a % of all Recipients (individual & aggregate disclosures) - Clause 28															N/A	N/A	N/A	N/A	0	0	0	0				0			
(Clause 28)																													
OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons Clause 1.8 supplementary information																													
Aggregate amount attributable to transfers of value to such Recipients - Template & Clause 28.5															N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A			
Number of Recipients in aggregate disclosure - Template & Clause 28.5															N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A			
Number of Recipients disclosed in aggregate as a % of all Recipients (individual & aggregate disclosures) - Clause 28.5															N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A			
AGGREGATE DISCLOSURE																													
Transfers of Value re: Research & Development as defined Clause 1.20																					13,070.61				13,070.61				

Denmark

DISCLOSURE OF PAYMENTS TO HEALTHCARE PROFESSIONALS (HCPs), OTHER RELEVANT DECISION MAKERS (ORDMs) AND HEALTHCARE ORGANISATIONS (HCOs) 2024 ABPI CODE OF PRACTICE (Clause 28)																							Date of publication: 30.06.2025					
Full Name						HCPs/ORDMs: City of Principal Practice HCOs: city where registered	Country of Principal Practice	Principal Practice Address						Unique country local identifier OPTIONAL (Note 3)	Collaborative Working (which includes Joint Working) (Clauses 20 & 28)	Donation s and Grants to HCOs (Clauses 23 & 28)	Contribution to costs of Events (Clauses 10 & 28)			Contracted Services (Clauses 24 & 28)			Blank Column (Clause X)		TOTAL			
(Clause 28)						(Clause 28)	(Clause 28)	(Clause 28)						(Clause 28)			Sponsorship agreements with HCOs / third party organisations appointed by HCOs to manage an Event (Note M)	Registrati on Fees	Travel & Accommodation	Fees	Expenses		Blank Column (Clause X)	Blank Column (Clause X)				
Title	First Name	Initial	Last Name	Speciality	Role	HCPs/ORDMs: City of Principal Practice HCOs: city where registered	Country of Principal Practice	Institution Name	Location	Address Line 1	Address Line 2	Post Code	Email	Local Register ID or Third Party Database ID														
INDIVIDUAL	HCPs and ORDMs	INDIVIDUAL NAMED DISCLOSURE - one line per HCP/ORDM (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 - Template & Clause 28														N/A	N/A	N/A	N/A	0	0	0	0			0		
		Number of Recipients in aggregate disclosure - Template & Clause 28														N/A	N/A	N/A	N/A	0	0	0	0			0		
		Number of Recipients disclosed in aggregate as a % of all Recipients (individual & aggregate disclosures) - Clause 28														N/A	N/A	N/A	N/A	0	0	0%	0			0%		
	HCOs	(Clause 28)																										
		OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons Clause 1.8 supplementary information																										
		Aggregate amount attributable to transfers of value to such Recipients - Template & Clause 28.5														N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A			N/A		
		Number of Recipients in aggregate disclosure - Template & Clause 28.5														N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A			N/A		
		Number of Recipients disclosed in aggregate as a % of all Recipients (individual & aggregate disclosures) - Clause 28.5														N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A			N/A		
AGGREGATE	Research and Development	AGGREGATE DISCLOSURE																										
		Transfers of Value re: Research & Development as defined Clause 1.20																				110.00			110.00			

(ORDMs) AND HEALTHCARE ORGANISATIONS (HCOs)									Date of publication: 30.06.2025		
Collaborative Working (which includes Joint Working) (Clauses 20 & 28)		Donations and Grants to HCOs (Clauses 23 & 28)	Contribution to costs of Events (Clauses 10 & 28)			Contracted Services (Clauses 24 & 28)			Blank Column (Clause X)		TOTAL
			Sponsorship agreements with HCOs / third party organisations appointed by HCOs to manage an Event (Note M)	Registration Fees	Travel & Accommodation	Fees	Expenses		Blank Column (Clause X)	Blank Column (Clause X)	
Total HCP will be summed up; itemization should be available for the individual Recipient or public authorities' consultation only, as appropriate)											
Information cannot be disclosed on an individual basis for legal reasons											
N/A	N/A	N/A	N/A	0	0	935	0				935
N/A	N/A	N/A	N/A	0	0	2	0				2
N/A	N/A	N/A	N/A	0	0	100%	0				100%
Information disclosed on an individual basis for legal reasons Clause 1.8 supplementary information											
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A
AGGREGATE DISCLOSURE											
e 1.20								3750			3750

Netherlands

DISCLOSURE OF PAYMENTS TO HEALTHCARE PROFESSIONALS (HCPs), OTHER RELEVANT DECISION MAKERS (ORDMs) AND HEALTHCARE ORGANISATIONS (HCOs)																				Date of publication: 30.06.2025									
Full Name						HCPs/ORDMs: City of Principal Practice HCOs: city where registered	Country of Principal Practice	Principal Practice Address						Unique country local Identifier OPTIONAL (Note 3)	Collaborative Working (which includes Joint Working) (Clauses 20 & 28)		Donations and Grants to HCOs (Clauses 23 & 28)	Contribution to costs of Events (Clauses 10 & 28)			Contracted Services (Clauses 24 & 28)				Blank Column (Clause X)		TOTAL		
(Clause 28)						(Clause 28)	(Clause 28)	(Clause 28)						(Clause 28)							Fees	Expenses			Blank Column (Clause X)	Blank Column (Clause X)			
Title	First Name	Initial	Last Name	Speciality	Role	HCPs/ORDMs: City of Principal Practice HCOs: city where registered	Country of Principal Practice	Institution Name	Location	Address Line 1	Address Line 2	Post Code	Email	Local Register ID or Third Party Database ID															
INDIVIDUAL	HCPs and ORDMs	INDIVIDUAL NAMED DISCLOSURE - one line per HCP/ORDM (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 - Template & Clause 28														N/A	N/A	N/A	N/A	0	0	0	0				0		
	Number of Recipients in aggregate disclosure - Template & Clause 28														N/A	N/A	N/A	N/A	0	0	0	0				0			
	Number of Recipients disclosed in aggregate as a % of all Recipients (individual & aggregate disclosures) - Clause 28														N/A	N/A	N/A	N/A	0	0	0%	0				0%			
	HCOs	(Clause 28)																											
		OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons Clause 1.8 supplementary information																											
		Aggregate amount attributable to transfers of value to such Recipients - Template & Clause 28.5														N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A		
		Number of Recipients in aggregate disclosure - Template & Clause 28.5														N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A		
		Number of Recipients disclosed in aggregate as a % of all Recipients (individual & aggregate disclosures) - Clause 28.5														N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A		
AGGREGATE	Research and Development	AGGREGATE DISCLOSURE																											
		Transfers of Value re: Research & Development as defined Clause 1.20																					426.00			426.00			

Norway

DISCLOSURE OF PAYMENTS TO HEALTHCARE PROFESSIONALS (HCPs), OTHER RELEVANT DECISION MAKERS (ORDMs) AND HEALTHCARE ORGANISATIONS (HCOs)																							Date of publication: 30.06.2025						
Full Name						HCPs/ORDMs: City of Principal Practice HCOs: city where registered	Country of Principal Practice	Principal Practice Address						Unique country /local identifier OPTIONAL (Note 3)	Collaborative Working (which includes Joint Working) (Clauses 20 & 28)		Donations and Grants to HCOs (Clauses 23 & 28)	Contribution to costs of Events (Clauses 10 & 28)			Contracted Services (Clauses 24 & 28)				Blank Column (Clause X)		TOTAL		
(Clause 28)						(Clause 28)	(Clause 28)	(Clause 28)						(Clause 28)				Sponsorship agreements with HCOs / third party organisations appointed by HCOs to manage an Event (Note M)	Registration Fees	Travel & Accommodation	Fees	Expenses		Blank Column (Clause X)	Blank Column (Clause X)				
Title	First Name	Initial	Last Name	Speciality	Role	HCPs/ORDMs: City of Principal Practice HCOs: city where registered	Country of Principal Practice	Institution Name	Location	Address Line 1	Address Line 2	Post Code	Email	Local Register ID or Third Party Database ID															
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		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 - Template & Clause 28														N/A	N/A	N/A	N/A	0	0	0	0				0		
		Number of Recipients in aggregate disclosure - Template & Clause 28														N/A	N/A	N/A	N/A	0	0	0	0				0		
		Number of Recipients disclosed in aggregate as a % of all Recipients (individual & aggregate disclosures) - Clause 28														N/A	N/A	N/A	N/A	0%	0%	0%	0%				0%		
	HCOs	(Clause 28)																											
		OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons Clause 1.8 supplementary information																											
		Aggregate amount attributable to transfers of value to such Recipients - Template & Clause 28.5														N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A		
		Number of Recipients in aggregate disclosure - Template & Clause 28.5														N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A		
		Number of Recipients disclosed in aggregate as a % of all Recipients (individual & aggregate disclosures) - Clause 28.5														N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A		
AGGREGATE	Research and Development	AGGREGATE DISCLOSURE																											
		Transfers of Value re: Research & Development as defined Clause 1.20																				44,748.36			44,748.36				

DISCLOSURE OF PAYMENTS TO HEALTHCARE PROFESSIONALS (HCPs), OTHER RELEVANT DECISION MAKERS (ORDMs) AND HEALTHCARE ORGANISATIONS (HCOs) 2024 ABPI CODE OF PRACTICE (Clause 28)																							Date of publication: 30.06.2025							
		Full Name					HCPs/ORDMs: City of Principal Practice HCOs: city where registered	Country of Principal Practice	Principal Practice Address						Unique country local Identifier OPTIONAL (Note 3)	Collaborative Working (which includes Joint Working) (Clauses 20 & 28)	Donations and Grants to HCOs (Clauses 23 & 28)	Contribution to costs of Events (Clauses 10 & 28)			Contracted Services (Clauses 24 & 28)			Blank Column (Clause X)		TOTAL				
		(Clause 28)					(Clause 28)	(Clause 28)	(Clause 28)						(Clause 28)			Sponsorship agreements with HCOs / third party organisations appointed by HCOs to manage an Event (Note M)	Registration Fees	Travel & Accommodation	Fees	Expenses		Blank Column (Clause X)	Blank Column (Clause X)					
		Title	First Name	Initial	Last Name	Speciality	Role	HCPs/ORDMs: City of Principal Practice HCOs: city where registered	Country of Principal Practice	Institution Name	Location	Address Line 1	Address Line 2	Post Code	Email	Local Register ID or Third Party Database ID														
INDIVIDUAL	HCPs and ORDMs	INDIVIDUAL NAMED DISCLOSURE - one line per HCP/ORDM (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 - Template & Clause 28														N/A	N/A	N/A	N/A	0	0	7,000.00	272.96				7,272.96			
	Number of Recipients in aggregate disclosure - Template & Clause 28														N/A	N/A	N/A	N/A	0	0	1	1				1				
	Number of Recipients disclosed in aggregate as a % of all Recipients (individual & aggregate disclosures) - Clause 28														N/A	N/A	N/A	N/A	0%	0%	100%	100%				100%				
	HCOs	(Clause 28)																												
OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons Clause 1.8 supplementary information																														
Aggregate amount attributable to transfers of value to such Recipients - Template & Clause 28.5														N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A					
Number of Recipients in aggregate disclosure - Template & Clause 28.5														N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A					
Number of Recipients disclosed in aggregate as a % of all Recipients (individual & aggregate disclosures) - Clause 28.5														N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A					
AGGREGATE	Research and Development	AGGREGATE DISCLOSURE																												
		Transfers of Value re: Research & Development as defined Clause 1.20																				0			0					

Romania

DISCLOSURE OF PAYMENTS TO HEALTHCARE PROFESSIONALS (HCPs), OTHER RELEVANT DECISION MAKERS (ORDMs) AND HEALTHCARE ORGANISATIONS (HCOs) 2024 ABPI CODE OF PRACTICE (Clause 28)																							Date of publication: 30.06.2025				
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(Clause 28)						(Clause 28)	(Clause 28)	(Clause 28)									(Clause 28)	Sponsorship agreements with HCOs / third party organisations appointed by HCOs to manage an Event (Note M)	Registration Fees	Travel & Accommodation	Fees		Expenses	Blank Column (Clause X)		Blank Column (Clause X)	
Title	First Name	Initial	Last Name	Speciality	Role	HCPs/ORDMs: City of Principal Practice HCOs: city where registered	Country of Principal Practice	Institution Name	Location	Address Line 1	Address Line 2	Post Code	Email	Local Register ID or Third Party Database ID													
INDIVIDUAL	HCPs and ORDMs	INDIVIDUAL NAMED DISCLOSURE - one line per HCP/ORDM (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 - Template & Clause 28														N/A	N/A	N/A	N/A	0	0	0	0				0
		Number of Recipients in aggregate disclosure - Template & Clause 28														N/A	N/A	N/A	N/A	0	0	0	0				0
	Number of Recipients disclosed in aggregate as a % of all Recipients (individual & aggregate disclosures) - Clause 28														N/A	N/A	N/A	N/A	0%	0%	0%	0%				0%	
	HCOs	(Clause 28)																									
		OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons Clause 1.8 supplementary information																									
		Aggregate amount attributable to transfers of value to such Recipients - Template & Clause 28.5														N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A
Number of Recipients in aggregate disclosure - Template & Clause 28.5														N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A		
Number of Recipients disclosed in aggregate as a % of all Recipients (individual & aggregate disclosures) - Clause 28.5														N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A		
AGGREGATE	Research and Development	AGGREGATE DISCLOSURE																									
		Transfers of Value re: Research & Development as defined Clause 1.20																				40,449.40			40,449.40		

Spain

DISCLOSURE OF PAYMENTS TO HEALTHCARE PROFESSIONALS (HCPs), OTHER RELEVANT DECISION MAKERS (ORDMs) AND HEALTHCARE ORGANISATIONS (HCOs) 2024 ABPI CODE OF PRACTICE (Clause 28)																						Date of publication: 30.06.2025									
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	(Clause 28)					(Clause 28)	(Clause 28)	(Clause 28)						(Clause 28)			Sponsorship agreements with HCOs / third party organisations appointed by HCOs to manage an Event (Note M)	Registration Fees	Travel & Accommodation	Fees	Expenses		Blank Column (Clause X)	Blank Column (Clause X)							
	Title	First Name	Initial	Last Name	Speciality	Role	HCPs/ORDMs: City of Principal Practice HCOs: city where registered	Country of Principal Practice	Institution Name	Location	Address Line 1	Address Line 2	Post Code	Email	Local Register ID or Third Party Database ID																
INDIVIDUAL	HCPs and ORDMs	INDIVIDUAL NAMED DISCLOSURE - one line per HCP/ORDM (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)																													
		Aggregate amount attributable to transfers of value to such Recipients - Template & Clause 28															N/A	N/A	N/A	N/A	0	0	6,816.67	11,164.54				17,981.21			
		Number of Recipients in aggregate disclosure - Template & Clause 28															N/A	N/A	N/A	N/A	0	0	2	2				2			
	Number of Recipients disclosed in aggregate as a % of all Recipients (individual & aggregate disclosures) - Clause 28															N/A	N/A	N/A	N/A	0%	0%	100%	100%				100%				
	HCOs	(Clause 28)																													
		OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons Clause 1.8 supplementary information																													
Aggregate amount attributable to transfers of value to such Recipients - Template & Clause 28.5															N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A			
Number of Recipients in aggregate disclosure - Template & Clause 28.5															N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A			
Number of Recipients disclosed in aggregate as a % of all Recipients (individual & aggregate disclosures) - Clause 28.5															N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A			
AGGREGATE	Research and Development	AGGREGATE DISCLOSURE																													
		Transfers of Value re: Research & Development as defined Clause 1.20															200.00				200.00										

Sweden

DISCLOSURE OF PAYMENTS TO HEALTHCARE PROFESSIONALS (HCPs), OTHER RELEVANT DECISION MAKERS (ORDMs) AND HEALTHCARE ORGANISATIONS (HCOs) 2024 ABPI CODE OF PRACTICE (Clause 28)																							Date of publication: 30.06.2025																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														
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(Clause 28)						(Clause 28)	(Clause 28)	(Clause 28)						(Clause 28)			Sponsorship agreements with HCOs / third party organisations appointed by HCOs to manage an Event (Note M)	Registration Fees	Travel & Accommodation	Fees	Expenses		Blank Column (Clause X)	Blank Column (Clause X)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																													
Title	First Name	Initial	Last Name	Speciality	Role	HCPs/ORDMs: City of Principal Practice HCOs: city where registered	Country of Principal Practice	Institution Name	Location	Address Line 1	Address Line 2	Post Code	Email	Local Register ID or Third Party Database ID																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																							

Switzerland

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