

TRANSPARENCY INITIATIVES

1. INTRODUCTION

As a globally active company in various areas of the healthcare sector, we are committed to a transparent partnership with all healthcare professionals (HCPs) and healthcare organisations (HCOs). This close and well regulated partnership allows us to ensure that our medical products are continuously improved through research and the exchange of best clinical practices on state-of-the-art technology, and therefore this benefits the patient.

The disclosure of such partnerships is key because it helps to govern and promote a positive, collaborative and trust-based relationship between HCPs/HCOs and commercial life sciences organisations. This ensures that such relationships do not influence clinical decisions, as all financial interactions are fully transparent.

One of the most recent transparency initiatives comes from the European Federation of Pharmaceutical Industries and Associations (EFPIA). In 2013, EFPIA adopted this pharma self-regulation under the **'Code on Disclosure of Transfers of Value from Pharmaceutical Companies to HCPs and HCOs'**, which requires companies, such as GE Healthcare, to publicly publish a report by the end of June 2016 of all transfers of value from GE Healthcare to HCPs and HCOs accumulated in 2015. Such disclosures will occur on an annual basis. GE Healthcare, as a member of the pharmaceuticals industries, is committed to greater transparency of the financial relationships with HCPs by complying with both the EFPIA Transparency Code and other national Transparency regulations.

We are convinced that this industry-driven initiative is an important opportunity to demonstrate to the public that a close relationship between companies and the healthcare sector is in the best interest of patients and will therefore establish mutual trust for a long term benefit.

In accordance with the reporting standards of the EFPIA Disclosure Code/APME Code and all applicable data privacy regulations, the report lists the payments made to HCOs, HCPs and research and development for 2015.

2. EFPIA TEMPLATES

ESTONIAN VERSION

Andmete avalikustamise vorm												
												Kuupäev: 30-05-2016
Täisnimi	Tervishoiutöötaja/ apteekri tegevuskoht Teenuse osutaja tegevuskoht	Tegevuskoha riik	Tegevuskoha aadress	Unikaalne riigi tunnus (vabatahtlik)	Annetused ja stipendiumid tervishoiuteenus e osutajale	Sündmuste tasud			Teenuse ja konsultatsiooni tasud		KOKKU (valikuline) (in EUR)	
						Sponsoruslepingud tervishoiuteenuse osutajaga või tervishoiuteenuse osutaja määratud kolmanda osapoollega sündmuse korraldamiseks	Registreerimistasud	Reisi- ja majutuskulud	Tasud	Lepingus kokku lepitud seotud kulud, sh reisi ja majutuskulud		
ISIKULINE AVALIKUSTAMINE - KÕIK AASTA JOOKSUL ÜHELE TERVISHOIUTÖÖTAJALE/APTEEKRILE TEHTUD MAKSED KOKKU												
Ülejäänud tasud, mida ei või seadusest tulenevalt isikuliselt avalikustada ning mida ei ole märgitud üleval pool												
Tervishoiutöötaja/ apteeker	Kogusumma tervishoiutöötaja/ apteekri kohta				X	X	18.500	65.366				83.866
	Tasu saajate arv				X	X	21	43				64
	Summeeritud avalikustatavate tervishoiutöötajate/apteekrite % koostis avalikustamisele kuuluvast				X	X	100%	100%				
TEENUSE OSUTAJA PÕHINE AVALIKUSTAMINE - KÕIK AASTA JOOKSUL ÜHELE TEENUSE OSUTAJALE TEHTUD MAKSED KOKKU												
Teenuse osutaja	Baltic Nuclear Medicine Association	Tallinn	Eesti Vabariik	Sutiste tee 19			5.200					5.200
	Estonian Nuclear Medicine Society	Tallinn	Eesti Vabariik	Sutiste 19			2.800					2.800
	Eesti Radioloogiatehnikute Ühingu	Tallinn	Eesti Vabariik	Ravi 18			1.800					1.800
	Ülejäänud tasud, mida ei või seadusest tulenevalt isikuliselt avalikustada ning mida ei ole märgitud üleval pool											
SUMMEERITUD AVALIKUSTAMINE												
Uuringud ja arenduste gevused	Uuringute ja arendustegevuse jaoks makstud tasud											
Σ												EUR 93.666

ENGLISH EFPIA VERSION

Schedule 2 - ESTONIA Article 2 - Section 2.03														
	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 local 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)		Transfers of Value re Research & Development as defined (Art. 3.04)	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			
in EUR														
INDIVIDUAL	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. 3.2	N/A	N/A	18.500	65.366					N/A	83.866		
		Number of Recipients (named list, where appropriate) - Art. 3.2	N/A	N/A	21	43					N/A	64		
		% of total transfers of value to individual HCPs - Art. 3.2	N/A	N/A	100%	100%					N/A	N/A		
INDIVIDUAL	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												
		Baltic Nuclear Medicine Association	Tallinn	Estonia	Sutiste tee 19			5200					N/A	5.200
		Estonian Nuclear Medicine Society	Tallinn	Estonia	Sutiste 19			2800					N/A	2.800
		Eesti Radioloogitehnikute Ühingu	Tallinn	Estonia	Ravi 18			1800					N/A	1.800
OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons														
AGGREGATE	AGGREGATE DISCLOSURE													
	N/A	N/A	N/A	N/A	N/A		9.800	18.500	65.366	-	-		EUR 93.666	

3. METHODOLOGY

The purpose of this methodology is to clarify how the EFPIA/APME Disclosure Code¹ requirements have been implemented within the pharmaceutical business of GE Healthcare (GEHC) and its compliance programs. Any deviations from the EFPIA Disclosure Code that have been transposed into APME Disclosure Code have been taken into account.

1. Disclosable Transfers of Value

In line with the EFPIA requirements, the following transactions are in scope of each local EFPIA report:

1.1 Event support

GEHC may support a third-party organized event in the form of a sponsorship. If the event is organized by a third party (e.g. event organizer, travel agency) then the healthcare association responsible for the content of the educational program will be listed as the recipient of this transfer of value.

Example: GEHC is represented with a booth space during a medical congress

Where permitted under local law/code, GEHC may pay or reimburse modest travel, living, and registration expenses for HCPs attending a GE-led event or a third party event such as a third party congress. If a travel agency is being used to organize travel arrangements, the administrative fee for this service will not be reported.

Example: GEHC is paying the registration fee for an HCP to support his/her participation in a medical congress

1.2 Service and Consultancy

GEHC may engage an HCP to provide consulting services to fulfill a legitimate business need. Examples of consulting services include speaking engagements, product training, advisory board participation, review/input on publications, and product input. The published amount is the same as the amount agreed in the underlying contract.

Example: An HCP is hired to provide input on GEHC's product

¹ Art.12 APME Code

1.3 Grant

GEHC may provide funding or in-kind support of medical education programs (e.g., grand rounds, fellowships, scholarships) in the form of educational grants. The published amount is the same as the amount agreed in the underlying contract.

Example: GEHC is paying for medical books.

1.4 Donation

GEHC may donate money, products or services to legitimate charitable organizations. The published amount is the same as the amount agreed in the underlying contract.

Example: GEHC is providing a cash donation to a non-profit organization to support their work.

1.5 Research

GEHC may contract an HCP, an HCI (e.g., the site or investigator) or contract research organization (CRO) to conduct research. The published amount is the same as the amount agreed in the underlying contract.

Example: GEHC is hiring a CRO to do clinical study

2. Recipients of Transfers of Value

For each local report, GEHC has focused on the country where the recipient has his primary physical address.

2.1 Definition Healthcare Professional (HCP)

Any individual in a position, directly or indirectly, to purchase, lease, recommend, use, prescribe, or arrange for the purchase or lease of any GEHC product or service. Includes: physicians, physician assistants, nurses, pharmacists, technicians, other clinicians, or research coordinators.

2.2 Definition Healthcare Institution (HCO)

Any entity or its employees or agents, in a position, directly or indirectly, to purchase, lease, recommend, use, prescribe, or arrange for the purchase or lease of any GEHC product or service. Includes: hospitals, clinics, academic institutions, nursing homes, assisted living facilities purchasing agents, group purchasing organizations, physician's practice managers, and healthcare associations.

3. Period and value of transactions

In order to assure that a Disclosable Transfer of Value (ToV) has occurred and a consistent approach is being used, payments or any other transfers of benefit that have been made in 2015 for grants, donations, event support or services will only be disclosed in the 2015 data report if they have occurred or have been provided in 2015. Consequently, all ToV where either the payment or any other transfers of benefit has not been made in 2015 will only be reported in the next annual disclosure report.

Example: A speaker is providing his service during a congress in December 2015 but the payment is only made in January 2016. This transaction will be disclosed in the next EFPIA report in 2017.

3.1 Currency and taxes

All amounts inside the report are listed with the local currency, excluding the VAT or any other applicable taxes. In case payments have been made in a foreign currency, the exchange rate of the payment date has been used.

3.2 Transfers across country borders

Since the focus lays on the primary physical address of the recipient, all payments regardless of the location of the paying GEHC legal entity will be included under each local report.

Example: GEHC Belgium is paying an Estonian HCP consultant to provide product input. This transaction will be reported by GEHC Estonia in accordance with the CoC of the Estonian pharmaceutical association.

4. Individual and aggregate disclosure

The 2015 GE Healthcare report will disclose all ToV to HCP as an aggregated payment within each EFPIA country. This fulfills our disclosure requirements while maintaining our obligation to obtain an individual HCP's consent before public reporting. Where consent has not been provided or has been revoked, the ToV will be published as an aggregated value. As per the EFPIA/ APME Disclosure Code guidelines, all ToV relating to R&D will always be published under the dedicated aggregated value section.