

COMPANY: GE Healthcare

COUNTRIES:

1. BULGARIA/България
2. CROATIA/Hrvatska
3. HUNGARY/Magyarország
4. SLOVENIA/Slovenija
5. TURKEY/Türkiye

YEAR: 2016

1. BULGARIA/България

ИНИЦИАТИВИ ЗА ПРОЗРАЧНОСТ

1.УВОД

Като глобално активна фирма в различни области на здравния сектор, ние сме ангажирани с прозрачно партньорство с всички медицински специалисти (МС) и здравни организации (ЗО). Това близко и добре регулирано партньорство ни позволява да осигурим нашите медицински продукти да бъдат подобрявани непрекъснато чрез научни изследвания и обмяна на най-добрите клинични практики на високо технологична технология, което е в полза на пациента.

Оповестяването на такива партньорства е ключово, защото това помага да се управлява и промотира положителна, колаборативна и базирана на доверието връзка между МС/ЗО и търговските организации по науката за живота. Това осигурява тези връзки да повлияват клиничните решения, тъй като всички финансови взаимодействия са напълно прозрачни.

Една от най-последните инициативи за прозрачност идва от Европейската федерация на фармацевтичните индустрии и асоциации (EFPIA). През 2013 г, EFPIA възприе това фармацевтично саморегулиране според **‘Кодекс за оповестяване на преводите на суми от фармацевтични фирми до медицинските специалисти и здравни организации’**, който изисква фирмите като GE Healthcare, публично да публикуват доклад до края на юни за всички преводи на суми от GE Healthcare за медицинските специалисти и здравни организации натрупани през предходната година. Такива разкрития ще се провеждат на годишна база. GE Healthcare, като член на фармацевтичните индустрии, е ангажирана с по-голяма прозрачност за финансовите връзки със медицинските специалисти чрез спазване на EFPIA Код на прозрачност и другите национални разпоредби за прозрачност.

Ние сме убедени, че тази индустриално задвижвана инициатива е важна възможност да се демонстрира пред обществото, че близката връзка между фирмите и здравния сектор е в най-добър интерес за пациентите и затова създава взаимно доверие за дългосрочна полза.

Според докладващите стандарти на EFPIA/ARPharM Кодекси за разкриване и приложимите разпоредби за поверителност на данните, докладът изброява плащанията извършени до здравните организации и научните изследвания и разработки за 2016 г.

2. EFPIA ФОРМАТИ

БЪЛГАРСКА ВЕРСИЯ

Приложение № 2 - Формат на оповестяване													
по чл.13 от Кодекса за оповестяване на предоставяне на стойност													
	Име/Наименование	Град, в който се упражнява дейността/МС/седалище на ЗО	Държава по регистрацията 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	
							Договори за спонсорство със ЗО или с трети лица, посочени от ЗО като отговорни за провеждането на събитие	Такси за регистрация	Пътуване и настаняване	Хонорари	Съпътстващи разходи за услугата, уговорени в консултантския договор		
	(чл. 2)	(чл. 8)	чл. 8,9, 10, и 15	чл. 8,9, 10, и 15 ч	чл. 8,9, 10, и 15								
ИНДИВИДУАЛНО Оповестяване	ИНДИВИДУАЛНО Оповестяване – отделен ред за всеки МС (т.е. всякакъв 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)												
	Медицински специалисти	Д-р А					N/A	N/A				N/A	
		Д-р В					N/A	N/A				N/A	
		т.н.					N/A	N/A				N/A	
	ДРУГИ, (невключени по-горе поради правни ограничения, позволяващи информацията да се оповести индивидуално)												
	Обща сума на предоставената стойност на медицински специалисти - чл.19						N/A	N/A	3 409	8 176		N/A	11 585
	Брой медицински специалисти на обобщен принцип - чл.19						N/A	N/A	7	7		N/A	
	% на броя Получатели, включени в обобщеното оповестяване, от общия брой на тези получатели - чл.19						N/A	N/A	100%	100%		N/A	N/A
	Здравни организации	Индивидуално, поименно оповестяване - отделен ред за ЗО (т.е. всички предоставяния на стойност за годината за отделна ЗО се сумират: подробности следва да са достъпни за отделния Получател или при поискване от оправомощени публични органи)											
		ЗО 1											N/A
ЗО 2												N/A	
т.н.												N/A	
ДРУГИ (невключени по-горе поради правни ограничения, позволяващи информацията да се оповести на индивидуална основа)													
Обща сума на предоставената стойност на здравни организации - чл.19											N/A		
Брой здравни организации на обобщен принцип - чл.19											N/A		
% на броя Получатели, включени в обобщеното оповестяване, от общия брой на тези получатели - чл.19											N/A	N/A	
Научноизследователска и развойна дейност	ОБЩЕНО Оповестяване												
	Предоставяне на стойност за научноизследователска и развойна дейност (чл. 21)										0		
Σ									3 409	8 176			BGN 11 585

ENGLISH VERSION

Schedule 2 - TEMPLATE															
Article 2 - Section 2.03															
	Full Name <i>(Art. 1.01)</i>	HCPs: City of Principal Practice HCOs: city where registered <i>(Art. 3)</i>	Country of Principal Practice <i>(Schedule 1)</i>	Principal Practice Address <i>(Art. 3)</i>	Unique country local identifier OPTIONAL <i>(Art. 3)</i>	Donations and Grants to HCOs <i>(Art. 3.01.1.a)</i>	Contribution to costs of Events <i>(Art. 3.01.1.b & 3.01.2.a)</i>			Fee for service and consultancy <i>(Art. 3.01.1.c & 3.01.2.c)</i>		Transfers of Value Research & Development as defined <i>(Art. 3.04)</i>	TOTAL OPTIONAL		
							Sponsorship agreements with HCOs / third parties appointed by HCOs to manage an Event	Registration Fees	Travel & Accomodation	Fees	Related expenses agreed in the fee for service or consultancy contract				
INDIVIDUAL	<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>														
	HCPs	Dr A					N/A	N/A					N/A		
		Dr B						N/A	N/A					N/A	
		etc.						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 - <i>Art. 3.2</i>						N/A	N/A	3 409	8 176			N/A	11 585	
	Number of Recipients (named list, where appropriate) - <i>Art. 3.2</i>						N/A	N/A	7	7			N/A		
	% of total transfers of value to individual HCPs - <i>Art. 3.2</i>						N/A	N/A	100%	100%			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>													
		HCO 1												N/A	
		HCO 2												N/A	
		etc.												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 - <i>Art. 3.2</i>												N/A			
Number of Recipients (named list, where appropriate) - <i>Art. 3.2</i>												N/A			
% of total transfers of value to individual HCOs - <i>Art. 3.2</i>												N/A	N/A		
R&D	Transfers of Value Research & Development											0			
	Σ							3409	8176				BGN 11 585		

3. МЕТОДИКА

Целта на тази методика е да се обясни как изискванията на EFPIA/ ARPharM Кодекс за оповестяване са били реализирани във фармацевтичния бизнес на GE Healthcare (GEC) и нейните програми за съгласие. Всички отклонения от Кодекс за оповестяване на Европейската федерация на фармацевтичните индустрии и асоциации (EFPIA) са били транспонирани в ARPharM Кодекс за оповестяване и са взети предвид.

1. Оповестени преводи на суми

Според изискванията на EFPIA/Кодекс за оповестяване, следните сделки са в сферата на всеки местен EFPIA доклад:

1.1 Помощ за събитие

ГЕНС може да подкрепи събитие, организирано от трета страна, под формата за спонсорство. Ако събитието е организирано от трета страна (напр. Организатор на събитието, пътническа агенция) тогава здравната асоциация, отговорна за съдържанието на учебната програма, ще бъде посочена като реципиент на този превод на сумата.

Пример: ГЕНС е представена с щанд по време на медицински конгрес.

Там където е разрешено според местния закон/кодекс, ГЕНС може да заплати или компенсират скромно пътуване, дневни и регистрационни разходи за медицинския специалист, който присъства на събитие ръководено от GE или събитие на трета страна като конгрес на трета страна. Ако се използва пътническа агенция да организира пътните приготовления, административната такса за тази услуга няма да се докладва.

Пример: ГЕНС плаща таксата за регистрация за медицинския специалист, за да подкрепи неговото/нейното участие в медицинския конгрес.

1.2 Обслужване и консултация

ГЕНС може да ангажира здравен професионалист да осигури консултации услуги, за да задоволи нуждата на законния бизнес. Примери на консултации услуги включват ангажименти за речи, обучение за продукта, участие в консултативен съвет, преглед/въвеждане на публикации, и въвеждане на продукта. Публикуваната сума е същата като сумата съгласувана в подлежащия договор.

Ако ГЕНС реши да направи индиректно оповестяване на преводите до медицинските специалисти и здравни организации чрез договорна изследователска организация (CRO), като част от консултантско споразумение и е наясно с тяхната идентичност тогава тези преводи ще бъдат също така оповестени в категория Сервиз и Консултантски услуги.

Пример: Здравен професионалист е нает да осигури въвеждане на продукт на ГЕНС.

1.3 Субсидия

ГЕНС може да осигури финансиране или подкрепа в натура на програмите за медицинско обучение (напр. важни обиколки, стипендии за научни работи, стипендии за обучение) под формата на образователни субсидии. Публикуваната сума е същата като сумата съгласувана в подлежащия договор.

Пример: ГЕНС плаща за медицински книги.

1.4 Дарение

ГЕНС може да дари пари, продукти или услуги на законни благотворителни организации. Публикуваната сума е същата като сумата съгласувана в подлежащия договор.

Пример: ГЕНС осигурява дарение на ръка на организация с идеална цел, за да подкрепи работата ѝ.

1.5 Научно изследване

ГЕНС може да договори медицински специалист, здравен изследовател (напр. обект или изследовател) или договорна изследователска организация (CRO) да проведе научно изследване. Ако ГЕНС реши да направи индиректно оповестяване на преводите до медицинските специалисти и здравни организации чрез договорна изследователска организация (CRO) като част от научни изследвания и разработки и е наясно с тяхната идентичност тогава тези преводи ще бъдат също така оповестени в категория Научни Изследвания и Разработки. Публикуваната сума е същата като сумата съгласувана в подлежащия договор.

Пример: ГЕНС наема CRO да извърши клинично проучване.

2. Получатели на преведените суми

За всеки местен доклад, ГЕНС са се фокусирали върху държавата, където получателя има първичен физически адрес.

2.1 Дефиниция на медицински специалист (МС)

Всеки индивид на пост, директно или косено, да закупува, взема под наем, препоръчва, използва, предписва или урежда закупуване или на лизинг продукт или услуга на GEHC . Включва: лекари, лекарски асистенти, сестри, фармацевти, техници, други клиницисти или изследователски координатори.

2.2 Дефиниция на здравна организация (ЗО)

Всяка юридическа личност или нейните служители или агенти, на пост, директно или косвено, да закупуват, вземат на лизинг, препоръчват, използват, предписват или уреждат закупуване или на лизинг продукт или услуга на GEHC. Включва: болници, клиники, академични институции, частни болници, агенти за закупуване на асистирани ежедневни съоръжения, групово закупуващи организации, управители на лекарски практики и здравни асоциации.

3. Период и стойност на сделките

За да се осигури Оповестен превод на суми (ToV) да бъде извършен и да се използва принципен подход, плащанията и всички други преводи на облаги, които са извършени през 2016 г. за субсидии, дарения, подкрепа на събитие или услуги, ще бъдат разкрити в доклада с данни за 2017 г, ако са извършени или са били осигурени през 2016 г. съответно, всички ToV , където плащането или други преводи на облаги не са били извършени през 2016 г. ще бъдат докладвани само в следващия годишен доклад за оповестяване.

Пример: Говорител осигурява услуга по време на конгрес през декември 2015 но плащането е извършено през януари 2016. Тази сделка ще бъде оповестена в следващия EFPIA доклад през 2017 г.

Също така, ако Оповестен превод на суми (ToV) се състои от няколко плащания и същите не са извършени в една и съща календарна година оповестяването ще бъде извършено през няколко години.

Пример: Здравен консултант извършва услуга през четвърто тримесечие на 2016г. и също така пътува за да извърши проучване. Ако пътуването без да се включва услугата е било платено през 2016г. тогава Оповестеният превод на суми (ToV) ще бъде частично оповестен през 2017г. и 2018г.

3.1 Валута и данъци

Всички суми в доклада са изброени в местна валута и не включват ДДС и всички приложими данъци. Ако плащанията са направени в чужда валута, използван е курса на обмяна в деня на плащането.

3.2 Превод през границата на държавата

Тъй като фокусът лежи върху първичния физически адрес на получателя, всички плащания независимо от локацията на плащането от юридическото лице на GEHC ще бъдат включени във всеки местен доклад.

Пример: GEHC Германия плаща на български МС консултант, за да осигури въвеждане на продукт. Тази сделка ще се докладва от GEHC България според CoS на Българската фармацевтична асоциация.

4. Индивидуално и обобщено оповестяване

Докладът на GE Healthcare ще оповести всички ToV за здравните професионалисти индивидуално, след получено индивидуално съгласие от всеки здравен професионалист. В случаите когато, такова съгласие не е получено или е било отменено през същата календарна година всички ToV свързани с това лице ще бъдат публикувани, като обобщена сума. Там където няма съгласие или е било отменено, ToV ще се публикува като обобщена сума. Според утвърденията на EFPIA/ARPhaM Кодекс за оповестяване, всички ToV отнасящи се до изследователска и развойна дейност ще бъдат винаги публикувани в специалния раздел за обобщена сума.

Процента на обобщената сума се изчислява отнесен към съответната категория.

Пример: В графа Консултантски услуги са включени 30 лица, към които е имало превод на сума. Двадесет от тях са дали съгласието си за индивидуално разкриване. В този случай процента на обобщеното разкриване ще бъде равен на 33%.

2. CROATIA/Hrvatska

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 of all transfers of value from GE Healthcare to HCPs and HCOs accumulated in the previous year. 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/IFI Disclosure Code and all applicable data privacy regulations, the report lists the payments made to HCOs, HCPs and research and development.

2. EFPIA TEMPLATES

CROATION VERSION

Dodatak 1 – primjer											Datum objave: 30.06.2016.
Ime i prezime (čl. 19.1.)	Zdravstveni radnik: Grad osobnog ili profesionalnog prebivališta ili sjedišta Primatelja (čl. 20.6.)	Država profesionalnog prebivališta ili sjedišta Primatelja (čl. 20.6. u vezi čl. 2.1.)	Primarna adresa profesionalne djelatnosti (čl. 20.6.)	Jedinstvena oznaka države (OPCIONALNO) (čl. 20.6.)	Donacije Zdravstvenim organizacijama (čl. 20.1.A. (i) .a.)	Troškovi u vezi Sastanaka (čl. 20.1.A. (ii) i 20.1.B. (i))			Naknada za usluge (čl. 20.1.A. (iii) i 20.1.B. (ii))		UKUPNO OPCIONALNO
	(čl. 20.1.A. (i))	Iznos sponzorstva iz ugovora o sponzorstvu sa Zdravstvenom organizacijom/trećim osobama (u ime Zdravst. Organizacije)	Trošak kotizacije	Putni troškovi i troškovi smještaja	Naknada	Vežani troškovi koji su ugovoreni uz naknadu 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)											
Zdravstveni radnik	Vinko Vidjak	Zagreb	Hrvatska	Zajčeva 19	N/A	N/A			6022		6 022
	OSTALO, ŠTO NIJE UKLJUČENO GORE: kada zbog postojanja pravnih zapreka podatak nije moguće objaviti pojedinačno										
	Zbirno objavljivanje s naslova Prijenosa Vrijednosti Primateljima – čl. 20.2.					N/A	N/A	2 17 249	196 457		413 706
	Ukupni broj Primatelja kod zbirne objave – čl. 20.2.					N/A	N/A	107	105		
% broja Primatelja kod zbirnog objavljivanja u odnosu na ukupni broj Primatelja – čl. 20.2.					N/A	N/A	100%	100%			
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)											
Zdravstvena organizacija	Hrvatska Komora Zdravstvenih Radnika	Zagreb	Hrvatska	Ilica 229/I		2750					2 750
	Hrvatski Liječnički Zbor	Zagreb	Hrvatska	Šubičeva ul. 9		40 350					40 350
	Klinički zavod za dijagnostičku i intervencijsku radiologiju	Zagreb	Hrvatska	Zajčeva 19		9 554					9 554
	Zdravstveno veleučilište	Zagreb	Hrvatska	Minarska cesta 38		5 000					5 000
	Hrvatsko kardiološko društvo	Zagreb	Hrvatska	Kišpatičeva 12		18 750					18 750
	OSTALO, ŠTO NIJE UKLJUČENO GORE: kada zbog postojanja pravnih zapreka podatak nije moguće objaviti pojedinačno										
Zbirno objavljivanje s naslova Prijenosa Vrijednosti Primateljima – čl. 20.2.											
Ukupni broj Primatelja kod zbirne objave – čl. 20.2.											
% broja Primatelja kod zbirnog objavljivanja u odnosu na ukupni broj Primatelja – čl. 20.2.											
ZBIRNO OBJAVLJIVANJE											
Istraživanje i Razvoj	Prijenos Vrijednosti u svrhu Istraživanja i Razvoja prema definiciji iz čl. 21.2.2..										0
Σ						76404	217249	196457	6022		HRK 496 132

ENGLISH VERSION

Schedule 2 - EFPIA TEMPLATE														
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 for 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			
<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>														
INDIVIDUAL	HCPs	Vinko Vidjak	Zagreb	Hrvatska	Zajčeva 19		N/A	N/A			6022	N/A	6022	
		<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. 3.2						N/A	N/A	217 249	196 457		N/A	413 706
		Number of Recipients (named list, where appropriate) - Art. 3.2						N/A	N/A	107	105		N/A	
	% of total transfers of value to individual HCPs - Art. 3.2						N/A	N/A	100%	100%		N/A		
	<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>													
	HCOs	Hrvatska Komora Zdravstvenih Radnika	Zagreb	Hrvatska	Ilica 229/I			2 750					N/A	34 425
		Hrvatski Liječnički Zbor	Zagreb	Hrvatska	Šubičeva ul. 9			40 350					N/A	12 500
		Klinički zavod za dijagnostičku i intervencijsku radiologiju	Zagreb	Hrvatska	Zajčeva 19			9 554					N/A	10 000
		Zdravstveno veleučilište	Zagreb	Hrvatska	Mlinarska cesta 38			5 000					N/A	6 250
Hrvatsko kardiološko društvo		Zagreb	Hrvatska	Kišpatičeva 12			18 750					N/A	4 600	
<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. 3.2												N/A		
Number of Recipients (named list, where appropriate) - Art. 3.2												N/A		
% of total transfers of value to individual HCOs - Art. 3.2												N/A	N/A	
R&D														
Transfers of Value Research & Development														
Σ														
							76 404	217 249	196 457	6022			HRK 496 132	

3. METHODOLOGY

The purpose of this methodology is to clarify how the EFPIA/IFI Disclosure Code requirements will 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 the IFI 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

1.3 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

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 during one calendar year 'A' for grants, donations, event support or services will only be disclosed in the calendar year 'A' data report if they have occurred or have been provided in calendar year 'A'. Consequently, all ToV where either the payment or any other transfers of benefit has not been made in calendar year 'A' will only be reported in the next annual disclosure report.

Example: A speaker is providing his service during a congress in December 2016 but the payment is only made in January 2017. This transaction will be disclosed in the next EFPIA report in 2018.

Also, if a ToV consists of several payments and some are not processed in same calendar year, the disclosure will be made across several years.

Example: A HCP consultant is providing his service in Q4 2016 and travels as well to conduct his study. If the travel but not the service has been paid in 2016 then the ToV will partly be disclosed in the 2017 and 2018 reports.

3.1 Currency and taxes

All amounts inside the report are listed with the local currency and including 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 Germany is paying a Croatian HCP consultant to provide product input. This transaction will be reported by GHEC Croatia in accordance with the CoC of the Croatian pharmaceutical association.

4. Individual and aggregate disclosure

The GEHC report will disclose all ToV individually if consent has been provided by the individual recipient. Where consent has not been provided, or has been revoked throughout the same calendar year, all ToV related to this individual will be published under the aggregated section. As per the EFPIA/IFI Disclosure Code guidelines, all ToV relating to R&D will be published under the dedicated aggregated value section.

The percentage for aggregated values is being calculated per category.

Example: Under Consultancy Fees, there are 30 individuals who have received a Transfer of Value. 20 of them have provided their consent to allow individual disclosure. The percentage for aggregated disclosure will be 33% in this case.

3. HUNGARY/Magyarország

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 of all transfers of value from GE Healthcare to HCPs and HCOs accumulated in the previous year. 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/AIPM Disclosure Code and all applicable data privacy regulations, the report lists the payments made to HCOs, HCPs and research and development

2. TEMPLATES

TEMPLATE HUNGARIAN VERSION

1. sz Melléklet - minta													
	Név	Egészségügyi szolgáltató / szervezet) vagy praxis helye (Egészségügyi szakember)	Tevékenység végzésének helye (ország szerint)	Tevékenység végzésének címe	Peccszám / nyilvántartási szám (cégjegyzékszám, statisztikai számjel stb.)OPCIONÁLIS	Egészségügyi szolgáltatóknak / szervezetnek nyújtott adományok és támogatások (3.1.1.a pont)	Rendezvényekhez nyújtott Juttatások (3.1.1.b & 3.1.2.a pont)			Szolgáltatói és tanácsadói díjak (3.1.1.c & 3.1.2.b pont)		Összeg OPCIONÁLIS	
							Egészségügyi szolgáltatóval / szervezettel vagy Egészségügyi szolgáltató / szervezet által megbízott harmadik féllel Rendezvény szervezésére kötött támogatási szerződés	Regisztrációs díjak	Utazási és szállás költségtérítés	Díjak	A szolgáltatói és tanácsadói szerződésben meghatározott járulékos költségek		
	(3. pont)	(3. pont)	(1.sz. Melléklet)	(3. pont)	(3. pont)								
INDIVIDUAL	Egészségügyi szakember	NÉV SZERINTI EGYÉNI KÖZZÉTÉTEL - Egészségügyi szakembereknél (minden tárgyévi, egy Egészségügyi szakembernek nyújtott Juttatás összevonásra kerül: amennyiben szükséges, az egyes összesenkénti elszámolást a Kedvezményezettnek vagy az illetékes hatóságoknak)											
							N/A	N/A				N/A	
		EGYÉB, A FENTIEKHEZ NEM SOROLHATÓ - amennyiben az információ egyéni közzétételének jogi akadálya van											
		A fentiek szerinti Kedvezményezettek nyújtott Juttatások összege - 3.2. pont	N/A	N/A	333 756						N/A	333 756	
		Kedvezményezettek száma - összesített közzététel - 3.2. pont	N/A	N/A	1						N/A	Opcionális	
	Kedvezményezettek (összesített közzététel) százalékos aránya az összes Kedvezményezett viszonylatában	N/A	N/A	100%						N/A	N/A		
	Egészségügyi szolgáltató / szervezet	NÉV SZERINTI EGYÉNI KÖZZÉTÉTEL - Egészségügyi szolgáltatóknál / szervezeteknél (minden tárgyévi, egy Egészségügyi szolgáltatóknak / szervezetnek nyújtott Juttatás összevonásra kerül: amennyiben szükséges, az egyes összesenkénti elszámolást a Kedvezményezettnek vagy)											
												N/A	Opcionális
		EGYÉB, A FENTIEKHEZ NEM SOROLHATÓ - amennyiben az információ egyéni közzétételének jogi akadálya van											
		A fentiek szerinti Kedvezményezettek nyújtott Juttatások összege - 3.2. pont										N/A	Opcionális
Kedvezményezettek száma - összesített közzététel - 3.2. pont											N/A	Opcionális	
Kedvezményezettek (összesített közzététel) százalékos aránya az összes Kedvezményezett viszonylatában - 3.2. pont										N/A	N/A		
Kutatás-fejlesztés	Kutatás-fejlesztéshez kapcsolódó Juttatások - 3.4 pont és 1.sz Melléklet												
											0		
Σ												333 756 HUF	

30/06/2017

ENGLISH VERSION

Schedule 2 - TEMPLATE													
Article 2 - Section 2.03													
	Full Name <i>(Art. 3)</i>	HCPs: City of Principal Practice HCOs: city where registered <i>(Art. 3)</i>	Country of Principal Practice <i>(Schedule 1)</i>	Principal Practice Address <i>(Art. 3)</i>	Unique country local identifier OPTIONAL <i>(Art. 3)</i>	Donations and Grants to HCOs <i>(Art. 3.01.1.a)</i>	Contribution to costs of Events <i>(Art. 3.01.1.b & 3.01.2.a)</i>			Fee for service and consultancy <i>(Art. 3.01.1.c & 3.01.2.c)</i>		Transfers of Value re Research & Development as defined <i>(Art. 3.04)</i>	TOTAL OPTIONAL
							Sponsorship agreements with HCOs / third parties appointed by HCOs to manage an Event	Registration Fees	Travel & Accomodation	Fees	Related expenses agreed in the fee for service or consultancy 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 or public authorities' consultation only, as appropriate)													
						N/A	N/A				N/A		
OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons													
INDIVIDUAL	HCPs	Aggregate amount attributable to transfers of value to such Recipients - <i>Art. 3.2</i>				N/A	N/A	333 756				N/A	333 756
		Number of Recipients (named list, where appropriate) - <i>Art. 3.2</i>				N/A	N/A	1				N/A	Optional
		% of total transfers of value to individual HCPs - <i>Art. 3.2</i>				N/A	N/A	100%				N/A	N/A
		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)											
											N/A	Optional	
OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons													
INDIVIDUAL	HCOs	Aggregate amount attributable to transfers of value to such Recipients - <i>Art. 3.2</i>										N/A	Optional
		Number of Recipients (named list, where appropriate) - <i>Art. 3.2</i>										N/A	Optional
		% of total transfers of value to individual HCOs - <i>Art. 3.2</i>										N/A	N/A
R&D													
Transfers of Value re Research & Development											0		
Σ												333 756 HUF	

3. METHODOLOGY

The purpose of this methodology is to clarify how the EFPIA/AIPM Disclosure Code 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 the AIPM Disclosure Code have been taken into account.

1. Disclosable Transfers of Value

In line with the EFPIA/ABPI code requirements, the following transactions are in scope:

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 a HCP to support his/her participation in a medical congress

1.2 Service and Consultancy

GEHC may engage a 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.

If GEHC makes indirect Disclosable Transfers to HCPs/HCOs through a contract research organization (CRO) as part of a consulting arrangement and is aware of their identity, then these transfers will be disclosed as well under the Service and Consultancy category.

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

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 a HCP, an HCI (e.g., the site or investigator) or contract research organization (CRO) to conduct research. If GEHC makes indirect Disclosable Transfers to HCPs/HCOs through a CRO as part of R&D and is aware of their identity, then these transfers will be disclosed under the R&D category. 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

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 during one calendar year 'A' for grants, donations, event support or services will only be disclosed in the calendar year 'A' data report if they have occurred or have been provided in calendar year 'A'. Consequently, all ToV where either the payment or any other transfers of benefit has not been made in calendar year 'A' will only be reported in the next annual disclosure report.

Example: A speaker is providing his service during a congress in December 2016 but the payment is only made in January 2017. This transaction will be disclosed in the next EFPIA report in 2018.

Also, if a ToV consists of several payments and some are not processed in same calendar year, the disclosure will be made across several years.

Example: A HCP consultant is providing his service in Q4 2016 and travels as well to conduct his study. If the travel but not the service has been paid in 2016 then the ToV will partly be disclosed in the 2017 and 2018 reports.

3.1 Currency and taxes

All amounts inside the report are listed with the local currency and 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 Poland is paying a Hungarian HCP consultant to provide product input. This transaction will be reported in accordance with the CoC of the local pharmaceutical association AIPM.

4. Individual and aggregate disclosure

The GEHC report will disclose all ToV individually if consent has been provided by the individual recipient. Where consent has not been provided, or has been revoked throughout the same calendar year, all ToV related to this individual will be published under the aggregated section. As per the EFPIA/AIPM Disclosure Code guidelines, all ToV relating to R&D will be published under the dedicated aggregated value section.

The percentage for aggregated values is being calculated per category.

Example: Under Consultancy Fees, there are 30 individuals who have received a Transfer of Value. 20 of them have provided their consent to allow individual disclosure. The percentage for aggregated disclosure will be 33% in this case.

5. SLOVENIA/Slovenija

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 of all transfers of value from GE Healthcare to HCPs and HCOs accumulated in the previous year. 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/FORUM Disclosure Code and all applicable data privacy regulations, the report lists the payments made to HCOs, HCPs and research and development.

2. TEMPLATES

SLOVENIAN VERSION

Kodeks o javni objavi prenosov sredstev zdravstvenim delavcem in zdravstvenim organizacijam s strani farmacevtskih družb, priloga 2: Predloga za JOPS										
	priimek in ime	registriran sedež za ZO oz. naslov opravljanja poklicne dejavnosti za ZD	Donacije in prispevki za izobraževanje (člen 3.1.1.1)	Prispevek za kritje stroškov povezanih z dogodki (člen 3.1.1.2 in člen 3.1.2.1)			Nadomestila za storitve in svetovanje (člen 3.1.1.3 in člen 3.1.2.2)		SKUPAJ OPCIJSKO	
				Sponzorske pogodbe z ZO ali tretjimi osebami, ki jih imenuje ZO za vodenje dogodka	Pristojbine za registracijo	Stroški potovanj in nastanitve	Nadomestila za storitve in svetovanje	Dogovorjeni in/ali s pogodbe določeni stroški, povezani s pogodbo za storitve (vključno s potnimi in nastanitvenimi stroški)		
POSAMEZNI PODATKI	ZDRAVSTVENI DELAVCI	OBJAVA PODATKOV PO POSAMEZNIH ZDRAVSTVENIH DELAVCIH - vsaka vrstica za posameznega ZD (seštevek vseh prenosov sredstev posameznemu ZD v času enega leta: na voljo mora biti opredelitev prenosov sredstev po kategorijah samo za posvetovanje glede vsakega prejemnika ali javnega organa, kot je to primerno)								
			N/A	N/A					N/A	
		DRUGO, KAR NI ZAJETO ZGORAJ - kjer podatka ni mogoče javno objaviti po posameznikih iz pravnih razlogov								
		Skupinski znesek za prenos sredstev takim prejemnikom (člen 3.2)	N/A	N/A			500	468	N/A	968
		Število prejemnikov (poimenski seznam prejemnikov, kjer je primerno) - (člen 3.2)	N/A	N/A			1	1	N/A	1
	% celotnega števila prejemnikov vključenih v skupinsko poročanje v primerjavi s celotnim številom razkritih prejemnikov (člen 3.2)	N/A	N/A			100%	100%	N/A	N/A	
	ZDRAVSTVENE ORGANIZACIJE	OBJAVA PODATKOV PO POSAMEZNIH ZDRAVSTVENIH ORGANIZACIJAH - vsaka vrstica za posamezno ZO (seštevek vseh prenosov sredstev posamezni ZO v času enega leta: na voljo mora biti opredelitev prenosov sredstev samo za posvetovanje glede vsakega prejemnika ali javnega organa, kot je to primerno)								
		Slovensko zdravniško društvo	Dunajska 162, 1001 Ljubljana	5000					N/A	5000
		DRUGO, KAR NI ZAJETO ZGORAJ - kjer podatka ni mogoče javno objaviti po posameznikih iz pravnih razlogov								
		Skupinski znesek za prenos sredstev takim prejemnikom (člen 3.2)							N/A	
Število prejemnikov v skupinskem poročanju (člen 3.2)								N/A		
% celotnega števila prejemnikov vključenih v skupinsko poročanje v primerjavi s celotnim številom razkritih prejemnikov (člen 3.2)							N/A	N/A		
RAZISKAVE IN RAZVOJ										
	Plačila na področju raziskav in razvoja (člen 3.4)							0		
Σ				5000			500	468	EUR 5 968	

ENGLISH VERSION

Schedule 2 - TEMPLATE													
Article 2 - Section 2.03													
		Full Name	Principal Practice Address or Registered Seat of Institution	Donations and Grants to HCOs (Art. 3..1.1.1)	Contribution to costs of Events (Art. 3.1.1.2 & 3.1.2.1)			Fee for service and consultancy (Art. 3.1.1.3 & 3.1.2.2)			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 related to the contract				
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)											
		Dr A										N/A	
		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			500	468	N/A	968
		Number of Recipients (named list, where appropriate) - Art. 3.2				N/A	N/A			1	1	N/A	1
	% of total transfers of value to individual HCPs - Art. 3.2				N/A	N/A			1	1	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)											
		Slovensko zdravniško društvo		Dunajska 162, 1001 Ljubljana				5 000				N/A	5 000
		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	
Number of Recipients (named list, where appropriate) - Art. 3.2										N/A			
% of total transfers of value to individual HCOs - Art. 3.2										N/A	N/A		
R&D		Transfers of Value re Research & Development as defined - Article 3.04									TOTAL AMOUNT	OPTIONAL	
Σ						5000			500	468		EUR 5968	

2. METHODOLOGY

The purpose of this methodology is to clarify how the EFPIA/FORUM Disclosure Code 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 the FORUM Disclosure Code have been taken into account.

1. Disclosable Transfers of Value

In line with the EFPIA/FORUM code requirements, the following transactions are in scope:

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 a HCP to support his/her participation in a medical congress

1.2 Service and Consultancy

GEHC may engage a 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.

If GEHC makes indirect Disclosable Transfers to HCPs/HCOs through a contract research organization (CRO) as part of a consulting arrangement and is aware of their identity, then these transfers will be disclosed as well under the Service and Consultancy category.

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

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 a HCP, an HCl (e.g., the site or investigator) or contract research organization (CRO) to conduct research. If GEHC makes indirect Disclosable Transfers to HCPs/HCOs through a CRO as part of R&D and is aware of their identity, then these transfers will be disclosed under the R&D category. 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

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 during one calendar year 'A' for grants, donations, event support or services will only be disclosed in the calendar year 'A' data report if they have occurred or have been provided in calendar year 'A'. Consequently, all ToV where either the payment or any other transfers of benefit has not been made in calendar year 'A' will only be reported in the next annual disclosure report.

Example: A speaker is providing his service during a congress in December 2016 but the payment is only made in January 2017. This transaction will be disclosed in the next EFPIA report in 2018.

Also, if a ToV consists of several payments and some are not processed in same calendar year, the disclosure will be made across several years.

Example: A HCP consultant is providing his service in Q4 2016 and travels as well to conduct his study. If the travel but not the service has been paid in 2016 then the ToV will partly be disclosed in the 2017 and 2018 reports.

3.1 Currency and taxes

All amounts inside the report are listed with the local currency and including 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 Croatia is paying a Slovenian HCP consultant to provide product input. This transaction will be reported in accordance with the CoC of the local pharmaceutical association FORUM.

4. Individual and aggregate disclosure

The GEHC report will disclose all ToV individually if consent has been provided by the individual recipient. Where consent has not been provided, or has been revoked throughout the same calendar year, all ToV related to this individual will be published under the aggregated section. As per the EFPIA/FORUM Disclosure Code guidelines, all ToV relating to R&D will be published under the dedicated aggregated value section.

The percentage for aggregated values is being calculated per category.

Example: Under Consultancy Fees, there are 30 individuals who have received a Transfer of Value. 20 of them have provided their consent to allow individual disclosure. The percentage for aggregated disclosure will be 33% in this case.

5. TURKEY/Türkiye

ŞEFFAFLIK GİRİŞİMLERİ

1. Giriş

Sağlık sektörünün çeşitli alanlarında global olarak aktif bir şirket olarak, tüm sağlık çalışanları (HCP'ler) ve sağlık kuruluşlar (HCO'lar) ile şeffaf bir ortaklığa kendimizi adadık. Bu yakın ve iyi düzenlenmiş ortaklık bizim tıbbi ürünlerimizin en gelişmiş teknolojideki en iyi klinik uygulamaların araştırılması ve mübadelesi ile sürekli olarak geliştirilmesini sağlamamıza izin verecektir ve bu nedenle bu hastaya faydalı olacaktır.

Bu ortaklığın ifşası önemlidir çünkü HCP'ler/HCO'lar ile ticari yaşam bilimleri kuruluşları arasındaki pozitif, işbirlikçi ve güven dayalı ilişkiyi yönetmeye ve teşvik etmeye yardımcı olmaktadır. Bu böyle ilişkilerin klinik kararları etkilememesini ve bunun yanında tüm mali ilişkilerin tam olarak şeffaf olmasını sağlamaktadır.

En son şeffaflık girişimlerinin birisi Avrupa İlaç Sanayileri ve Örgütleri Federasyonundan (EFPIA) gelmiştir. 2013 yılında, EFPIA GE Sağlık gibi şirketlerin her yılı Haziran ayının sonuna kadar bir önceki yılda GE Sağlık'tan HCP'lere ve HCO'lara yapılan tüm değer aktarımları hakkında bir raporu kamuya yayınlamasını gerektiren **“İlaç Şirketlerinden HCP'lere ve HCO'lara olan Değer Aktarımının İfşası hakkındaki Yasa”** kapsamında bu ilaç öz düzenlemesini benimsemiştir. Bu ifşalar yıllık esasta yapılacaktır. İlaç sanayilerinin bir üyesi olarak GE Sağlık Hem EFPIA Şeffaflık Yasası hem de diğer ulusal şeffaflık düzenlemelerine uyarak HCP'ler ile olan mali ilişkilerinde kendisini daha fazla şeffaflığa adanmaktadır.

Sanayiye dayalı girişim şirketler ile sağlık sektörü arasındaki yakın bir ilişkinin hastalar için faydalı olduğu ve bu nedenle uzun vadeli bir fayda için ortak güven oluşturacağını topluma göstermek için önemli bir fırsattır.

EFPIA Kamuya Açıklama Yasası / AIFD Kamuya Açıklama Yasası¹ ve tüm uygulanabilir veri gizlilik düzenlemelerinin rapor edilen standartlarına göre, bu rapor HCO'lara, HCP'lere ve araştırma ve geliştirmeye yapılan ödemeleri listelemektedir.

2. EFPIA ŞABLONLARI

TÜRKÇE VERSİYONU

30/06/2017

Çizelge 2 - SUNUM KALIBI													
Madde 2 - Bölüm 2.03													
	Ad - Soyad	SMM: Çalıştığı birincil şehir SK: Kayıtlı olduğu şehir	Çalıştığı Birincil Ülke	Ana Çalışma Adresi	Özgün Takip Kimlik Kodlaması OPSİYONEL	SK'lara başlıklar, destekler ve hibeler (Madde 3.01.1.a)	Etkinlik maliyetine katkılar (Madde 3.01.1.b ve 3.01.2.a)			Danışmanlık ve hizmet karşılığı ödenenler (Madde 3.01.1.c ve 3.01.2.c)		Araştırma ve Geliştirme ile ilgili değer transferleri (Madde 3.04)	TOPLAM OPSİYONEL
							SK'lara veya SK tarafından etkinliği yürütmek için seçilen 3. taraflarla yapılan Destek Sözleşmeleri	Kayıt Ücretleri	Seyahat ve Konaklama	Ücretler, ödemeler	Danışmanlık Hizmet Sözleşmesinde yer alan, yol ve konaklama masrafları dahil, sözleşmeye ilişkin masraflar		
	(Madde 1.01)	(Madde 3)	(Tanımlar)	(Madde 3)	(Madde 3)								
BİREYSEL	SMM	İSİM VERİLEREK YAPILAN BİREYSEL AÇIKLAMA - her sırada tek sağlık çalışanı (örnek; bir sağlık çalışanı için yapılan tüm yıllık masraf kalemleri toplanacaktır; denetleme durumunda, bireysel alıcı ya da kamusal kurumların her masraf kaleminin ayrı ayrı gösterilmesi mümkün olmalıdır)											
							Uygulanmaz	Uygulanmaz				Uygulanmaz	
		DİĞERLERİ, YUKARIDA YER ALMAYAN - yasal nedenlerle bireysel bazda açıklanamayan bilgiler											
		Bu tür alıcıya yapılan toplam değer transferi tutarı - Madde 3.2		Uygulanmaz	Uygulanmaz					89 760	47 940	Uygulanmaz	137 700
		Alıcı sayısı (uygunsa isim listesi) - Madde 3.2		Uygulanmaz	Uygulanmaz					17	17	Uygulanmaz	
	Bireysel Sağlık Çalışanına yapılan değer transferi toplamındaki % oranı		Uygulanmaz	Uygulanmaz					100%	100%	Uygulanmaz	Uygulanmaz	
	SK	İSİM VERİLEREK YAPILAN BİREYSEL AÇIKLAMA - bir sağlık çalışanı için ayrı bir sıra (örnek, her bir SK için yapılan TÜM yıllık değer transferleri toplanacaktır; denetleme durumunda, bireysel alıcı ya da kamusal kurumların her masraf kaleminin ayrı ayrı gösterilmesi mümkün olmalıdır)											
												Uygulanmaz	
		DİĞERLERİ, YUKARIDA YER ALMAYAN - yasal nedenlerle bireysel bazda açıklanamayan bilgiler											
		Bu tür alıcıya yapılan toplam değer transferi tutarı - Madde 3.2						176 009				Uygulanmaz	176 009
Alıcı sayısı (uygunsa isim listesi) - Madde 3.2							1				Uygulanmaz		
Bireysel Alıcıya yapılan değer transferi toplamındaki % oranı						100%				Uygulanmaz	Uygulanmaz		
Araştırma ve Geliştirme ile ilgili değer transferleri	Araştırma ve Geliştirme ile ilgili değer transferleri										0		
Σ								176 009		89 760	47 940	TRY 313 709	

ENGLISH VERSION

30/06/2017

Schedule 2 - TEMPLATE														
Article 2 - Section 2.03														
	Full Name	HCPs: City of Principal Practice HCOs: city where registered	Country of Principal Practice	Principal Practice Address	Unique country local identifier OPTIONAL	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 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 & Accomodation	Fees	Related expenses agreed in the fee for service or consultancy contract			
	(Art. 1.01)	(Art. 3)	(Schedule 1)	(Art. 3)	(Art. 3)									
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)												
							N/A	N/A				N/A		
		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			89 760	47 940	N/A	137 700
		Number of Recipients (named list, where appropriate) - Art. 3.2					N/A	N/A			17	17	N/A	
	% of total transfers of value to individual HCPs - Art. 3.2					N/A	N/A			100%	100%	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)												
													N/A	
		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						176 009					N/A	176 009
Number of Recipients (named list, where appropriate) - Art. 3.2							1					N/A		
% of total transfers of value to individual HCOs - Art. 3.2						100%					N/A	N/A		
R&D	Transfers of Value Research & Development											0		
Σ							176 009			89 760	47 940		TRY 313 709	

3. METODOLOJİ

Bu metodolojinin amacı EFPIA / AIFD Kamuya Açıklama Yasası gereksinimlerinin GE Sağlık (GEHC) ilaç işi ve uygunluk programları içerisinde nasıl uygulandığını açıklamak içindir. AIFD Kamuya Açıklama Yasasına konmuş EFPIA Kamuya Açıklama Yasasından sapmalar dikkate alınmıştır.

1. Kamuya Açıklanabilir Değer Aktarımları

EFPIA / AIFD Kamuya Açıklama Yasası Kamuya Açıklama gerekleri doğrultusunda, aşağıdaki işlemler her bir lokal EFPIA raporunun kapsamı içerisindedir:

1.1 Etkinlik desteği

GEHC üçüncü tarafça düzenlenen bir etkinliği sponsorluk şeklinde destekleyebilir. Eğer bir etkinlik üçüncü bir tarafça düzenleniyorsa (mesela, etkinlik organizatörü, seyahat acentesi), eğitim programının içeriğinden sorumlu sağlık kuruluşu bu değer aktarımının alıcısı olarak listelenecektir.

Örneğin: GEHC tıbbi kongre esnasında bir stand alanı ile temsil edilmektedir.

Yasal kanun/yasa kapsamında izin verildiği yerlerde, GEHC GE tarafından yönetilen bir etkinliğe veya üçüncü taraf kongresi gib bir üçüncü taraf etkinliğine katılan HCP'lere ilişkin mütevazi seyahat, yaşam ve kayıt masraflarını ödeyebilir veya karşılayabilir. Eğer bir seyahat acentesi seyahat düzenlemelerini organize etmek için kullanılıyorsa, bu hizmete ilişkin idari ücret rapor edilmeyecektir.

Örneğin: Bir HCP'nin tıbbi kongreye katılmasını desteklemek için kayıt ücretinin GEHC'nin ödemesi.

1.2 Hizmet ve Danışmanlık

GEHC meşru bir iş ihtiyacını yerine getirmesi için danışmanlık hizmetleri sağlaması için bir HCP'yi kullanabilir. Danışmanlık hizmetlerinin örnekleri konuşma katılımlarını, ürün eğitimi, danışma kuruluna katılımı, yayınlar hakkında inceleme / girdi ve ürün girdisini içermektedir. Yayınlanan miktar ana sözleşmede mutabık kalınan miktar ile aynıdır.

Şayet GEHC, HCPlere/HCOLara Kamuya Açıklanabilir Değer Aktarımlarını sözleşmeli araştırma organizasyonları (SOA) üzerinden bir danışmanlık ilişkisinin bir parçası olarak dolaylı olarak yapıyorsa ve bu kişilerin kimliklerinden haberdar ise bu şekilde yapılan aktarımlar da Hizmet ve Danışmanlık kategorisi altında ifşa edilecektir.

Örneğin: GEHC'nin ürününe girdi sağlamak için bir HCP'nin kiralınması

1.3 Burs

GEHC eğitim bursları şeklinde tıbbi eğitim programlarına (mesela büyük tur, üyelik, burslu öğrenim) aynı destek veya finansman sağlayabilir. Yayınlanan miktar ana sözleşmede mutabık kalınan miktar ile aynıdır.

Örneğin: Tıbbi kitaplar için GEHC'nin ödeme yapması.

1.4 Bağış

GEHC mütevazi hayırsever kuruluşlara para, ürün veya hizmet bağışı yapabilir. Yayınlanan miktar ana sözleşmede mutabık kalınan miktar ile aynıdır.

Örneğin: İşlerini desteklemek için kar amacı gütmeyen bir kuruluşa GEHC'nin nakit bir bağış vermesi.

1.5 Araştırma

GEHC araştırma yapması için bir HCP, HCl (mesela saha ve araştırmacı) veya sözleşmeli araştırma kuruluşu (CRO) ile bir sözleşme yapabilir. Şayet GEHC, HCPlere/HCOLara Kamuya Açıklanabilir Değer Aktarımlarını SOA üzerinden bir AR&GE ilişkisinin bir parçası olarak dolaylı olarak yapıyorsa ve bu kişilerin kimliklerinden haberdar ise bu şekilde yapılan aktarımlar AR&GE kategorisi altında ifşa edilecektir. Yayınlanan miktar ana sözleşmede mutabık kalınan miktar ile aynıdır.

Örnek: Bir klinik çalışma yapması için GEHC'nin bir CRO kiralınması

2. Değer Aktarımlarının Alıcıları

Her lokal rapor için, GEHC alıcının ana fiziksel adrese sahip olduğu ülkeye odaklanmaktadır.

2.1 Sağlık Çalışanının Tanımı (HCP)

Herhangi bir GEHC ürünü veya hizmetin satın alınması veya kiralınması için doğrudan veya dolaylı olarak satın alma, kiralama, tavsiyede bulunma, reçete yazma veya düzenleme pozisyonundaki herhangi bir bireydir. Doktorları, doktor asistanlarını, hemşireleri, eczacıları, teknisyenleri, diğer klinik görevlilerini veya araştırma koordinatörlerini içermektedir.

2.2 Sağlık Kuruluşunun Tanımı (HCO)

Herhangi bir GEHC ürünü veya hizmetin satın alınması veya kiralanması için doğrudan veya dolaylı olarak satın alma, kiralama, tavsiyede bulunma, reçete yazma veya düzenleme pozisyonundaki herhangi bir kurum veya çalışanları veya acenteleridir. Hastaneleri, klinikleri, akademik kuruluşları, bakım evlerini, destekli yaşam tesislerini, satın alma kurumlarını, grup satın alma kuruluşlarını, doktorun uygulama yöneticisini ve sağlık kuruluşlarını içermektedir

3. İşlemlerin süresi ve değeri

İfşa Edilebilir Değer Aktarımının (ToV) gerçekleşmesini ve tutarlı bir yaklaşımda bulunulmasını sağlamak için, kazandırıcılar, bağışlar, etkinlik destek veya hizmetleri için "A" yılında yapılmış ödemeler ve diğer menfaat aktarımları, "A" yılında meydana gelmiş veya sağlanmış ise, sadece "A" yılına ait veri raporunda açıklanacaktır. Sonuç olarak, ödemelerinin veya diğer menfaat aktarımlarının "A" yılında yapılmadığı tüm ToV'lar sadece bir sonraki yıllık açıklama raporunda rapor edilecektir.

Örneğin: Bir konuşmacı Aralık 2016'daki kongre esnasında hizmetini sunmaktadır fakat ödemesi ancak Ocak 2017'de yapılacaktır. Bu işlem bir sonraki 2018 yılı EFPIA raporunda açıklanacaktır.

Ayrıca, herhangi bir TOV'un birden fazla ödemeye tabi olması ve bu ödemelerin bazılarının aynı takvim yılına ait olmaması durumunda, bu ödemelerin ifşa edilmesi yıllara yansıtılarak yapılacaktır.

Örneğin: Bir HCP danışman hizmetlerini 2016'nın son çeyreğinde sağlayıp bu göreve uygun olarak seyahatlerini yapmıştır. Şayet seyahat masrafları ödenmiş ancak hizmet masraflar 2016 yılında ödenmemiş ise ToV kısmen 2017'de kısmense 2018 raporlarında yer alacaktır.

3.1 Para birimi ve vergiler

Rapor içindeki tüm miktarlar yerel para biriminde ve KDV ve diğer uygulanabilir vergiler hariç tutularak listelenmektedir. Ödemelerin yabancı para biriminde yapılması durumunda, ödeme tarihinin döviz kuru kullanılacaktır.

3.2 Ülke sınırları ötesine aktarımlar

Odak alıcının ana fiziksel adresi üzerine olduğundan, GEHC yasal kurumunun ödeme yaptığı yere bakılmaksızın tüm ödemeler her lokal rapora dahil edilecektir.

Örneğin: GEHC Almanya ürün girdisi yapması için bir Türk HCP danışmanına ödeme yapmaktadır. Bu işlem Türk ilaç kuruluşunun CoC'sine uygun olarak GEHC Türkiye tarafından rapor edilecektir.

4. Münferit ve toplu açıklama

Herhangi bir onay beyanı şahsen verilmişse GEHC raporu her bir ToV'yi bu şahıs kapsamında bildirecektir. Herhangi bir onayın verilmediği durumlarda veya aynı yıl içinde verilen onayın geri alındığı durumlarda, bu şahsa ilişkin tüm ToV'lar ilgili bölümde açıklanacaktır. EFPIA / AIFD Kamuya Açıklam Yasası kurallarına göre, R&D ile ilgili tüm ToV'lar daima toplu değer kısmında yayınlanacaktır.

Toplam değerlerin yüzdesi her bir kategori için hesaplanacaktır.

Örneğin: Danışmanlık Ücretleri kapsamında, 30 şahıs Değer Aktarımı almaktadır. Bunlardan 20 tanesi şahsen ifşa edilmek için onaylarını vermiştir. Bu durumda toplam onay ifşa oranı %33 olmuştur.