



Disclosure of Transfers of Value in Switzerland for 2015

Methodological Note

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SWITZERLAND

Servier fully supports the objectives of the EFPIA Disclosure Code. We believe this Code will contribute to provide a better insight on the long established relationship between healthcare professionals and pharmaceutical companies for the improvement of patient care.

The present document is intended to provide all methodological information relevant for interpretation of the information disclosed by Servier in Switzerland as required by the Article 3 of the EFPIA Code on Disclosure of Transfers of Value from Pharmaceutical Companies to Healthcare Professionals and Healthcare Organisations.

1. Definitions

1.1. Recipients of Transfers of Values

1.1.1. Healthcare Professionals

The following definition of Healthcare Professionals is provided by the EFPIA Disclosure Code:

“Any natural person that is a member of the medical, dental, pharmacy or nursing professions or any other person who, in the course of his or her professional activities, may prescribe, purchase, supply, recommend or administer a medicinal product and whose primary practice, principal professional address or place of incorporation is in Europe.

For the avoidance of doubt, the definition of HCP includes: (i) any official or employee of a government agency or other organisation (whether in the public or private sector) that may prescribe, purchase, supply or administer medicinal products and (ii) any employee of a Member Company whose primary occupation is that of a practicing HCP, but excludes (x) all other employees of a Member Company and (y) a wholesaler or distributor of medicinal products.”

This definition allows identifying the following professionals our Company is interacting with:

- Physicians
- Pharmacists
- Medical staff who are authorized to prescribe, return and use medications (for instance, midwives, dental hygienists, chiropractors, rescuers, caregivers who have followed a complementary training, medical podiatrists and complementary medicine professionals)

nb: the term “*physician*” refers in this context to a professional qualified to practice medicine.

1.1.2. Healthcare Organisations

The following definition of Healthcare Organisations is provided by the EFPIA Disclosure Code:

“Any legal person (i) that is a healthcare, medical or scientific association or organisation (irrespective of the legal or organisational form) such as a hospital, clinic, foundation, university or other teaching institution or learned society (except for patient organisations within the scope of the EFPIA PO Code) whose business address, place of incorporation or primary place of operation is in Europe or (ii) through which one or more HCPs provide services.”

This definition allows identifying the following Organisations our Company is interacting with:

- Hospitals,
- Healthcare institutions or clinics,
- Group medical practices,
- Universities (Medical departments),
- Foundations and charities involved in the medical domain,
- Medical or learned societies,
- Medical education companies,
- Associations of healthcare professionals.

1.2. Types of Transfers of Values being Disclosed

1.2.1. Transfers of Values to Healthcare Professionals

Transfers of values disclosed by our Company consist in:

- Registration fees,
- Travel and accommodation expenses,
- Fee for services,
- Expenses agreed in the services or consultancy contracts.

⇒ When provided, paid or reimbursed to Healthcare Professionals or for their benefit, either directly or indirectly.

1.2.2. Transfers of Values to Healthcare Organisations

Transfers of values disclosed by our Company consist in:

- Donations and grants,
- Registration fees,
- Sponsorship agreements,
- Travel and accommodation expenses,
- Fees for services,
- Expenses agreed in the services or consultancy contracts.

⇒ When provided, paid or reimbursed to Healthcare Organisations or for their benefit, either directly or indirectly.

1.2.3. Transfers of Values related to Research and Development Activities

According to the EFPIA Disclosure Code, Research and Development activities correspond to:

- Non-Clinical Studies (laboratory),
- Clinical Trials,
- Non-interventional Studies.

All kind of Transfers of Values – as identified in 1.2.1. and 1.2.2. – provided to Healthcare Professionals or Healthcare Organisations in relation with Research and Development activities are disclosed in aggregate.

Post marketing authorizations studies are also included in the figures provided for Research and Development activities.

1.3. Origin of the Transfers of Values

The information disclosed by our Company in the present country is provided on behalf of the Servier Group.

Servier is a Group of companies with affiliates in other countries that can initiate interactions with Healthcare Professionals or Healthcare Organisations.

A Group process is implemented to ensure that the local disclosure includes all transfers of values provided by companies of the Servier Group, either established locally or in foreign countries, during the previous calendar year (from 1st January to 31st December).

2. Disclosure Scope

2.1. Products Concerned

All Transfers of Values related to activities in connection with our Company's pharmaceutical products portfolio are included in the disclosure.

2.2. Excluded Transfers of Values

The Transfers of Values corresponding to the following categories or provided in relation with the following activities, are not included in the disclosed information:

- the usual conditions offered to professionals for the ordering and delivery of medications,
- the distribution of free medical samples to professionals (as part of prescriptions from competent authorities),
- the objects, general information and low-value didactic information, targeted at professionals and designed exclusively for medical or pharmaceutical activities, or used for postgraduate medical and pharmaceutical training and which, in both cases, are also useful to patients,
- meals of appropriate and reasonable prices (beverages included). The maximum authorized amount is 150 CHF per professional per meal in Switzerland, and according to the threshold applicable to each country.

2.3. Date of Transfers of Values

As a standard rule, the date considered to prepare the disclosure corresponds to the date of the financial payment made to or for the benefit of the recipient.

2.4. Direct and Indirect Transfers of Values

The disclosure includes both direct and indirect Transfers of Values provided to recipients or for their benefit.

In this context:

- Direct Transfers of Values are provided to the recipient by our Company directly,
- Indirect Transfers of Values are provided to the recipient through a third party. In this situation, our partners are required by contract to share with our Company all information relative to Transfers of Values in order to allow an appropriate preparation of the disclosure.

2.5. Transfers of Values in Case of Partial Attendance or Cancellation

In case of partial attendance or cancellation of the participation, Transfers of Values provided for the benefit of a recipient will disappear of the disclosed information.

Exception applies when Transfers of Values can be refund.

2.6. Cross Border Activities

A Group reporting process is implemented to ensure that the local disclosure includes all Transfers of Values provided by the companies of the Servier Group, either established locally or in foreign countries.

All Transfers of Values initiated by foreign companies of the Group are thus captured for disclosure in the country where the recipient has its physical address or principal place of practice, if applicable.

3. Specific Considerations

3.1. Country Unique Identifier Code (UCI)

The allocation of a Unique Country Identifier Code is intended to facilitate the identification of recipients at country level and to prevent confusion when several recipients have the same name.

This code is optional according to the EFPIA Disclosure Code.

In the present country, the UCI corresponds to the EAN code for HCPs.

3.2. Agreements

Each collaboration initiated by the Swiss subsidiary is subject to a contract with the HCP or the HCO.

Only the date of each Transfer of Value, as isolated operation, is taken into consideration to prepare the reporting.

4. Consent Management

4.1. Consent Collection

Consent to individual publication is collected prior to the publication through a dedicated consent form or an agreement directly integrated into the collaboration contract.

In case no consent is given, or if our Company was unable to obtain a consent form duly filled by the recipient, the publication is made under the aggregate category.

4.2. Management of Consent Withdrawal

A recipient may decide to modify or withdraw his or her consent to individual publication.

In that case, the publication will be adapted in short delay in accordance with the decision taken by the recipient. Disclosed information will be updated to move the amounts from the individual information category to the aggregated information category as defined by the reporting publication template.

4.3. Management of Recipient's Request

Recipients may initiate requests related to the information being published by our Company.

All demands will be processed according to our internal procedure.

5. Disclosure Financial Data

5.1. Publication Currency

The currency used for the current publication is CHF.

5.2. VAT

Financial amounts indicated in the publication are expressed without sales taxes included.

5.3. Calculation Rule

For Transfers of Values involving the use of foreign currencies, amounts are converted from the initial currency to the publication currency according to the Yearly Average Exchange Rate applicable at the date of the Transfers of Value.

6. Disclosure Form

6.1. Date of Publication

The date of publication is: 06/28/2016

This date has been defined in accordance with the Scienceindustries recommendation.

6.2. Reporting Year

The publication relates to the previous calendar year (from 1st January to 31st December).

This information will remain available on the Internet for a period of 3 years after the date of the publication.

6.3. Disclosure Platform

The publication is provided through:

- <http://www.servier.ch/index.cfm/de/engagements/transparenz/> in English and German
- <http://www.servier.ch/index.cfm/fr/engagements/transparence/> in English and French

6.4. Disclosure Language

The publication is provided in English, German and French.