



Disclosure of Transfers of Value Across Europe

Healthcare Compliance Office

CHUGAI PHARMA EUROPE LTD, MULLINER HOUSE, FLANDERS ROAD, TURNHAM GREEN, LONDON, W4 1NN



CONTENTS

Introduction..... 2

Chugai Affiliates Local Processes 2

Non-R&D Payments 3

Consent for Disclosure..... 3

Data Protection..... 3

Disclosure 4

2016 Disclosed Payments Listed by Country 5

Contacts 5

Link to EFPIA Code 5

INTRODUCTION

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 EU Data Protection Directive 95/46/EC and local legislation).

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) (<http://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 (<http://transparency.efpia.eu/the-efpia-code-2>) 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.

CHUGAI AFFILIATES LOCAL PROCESSES

The local payments by each Chugai affiliate separately disclose via central platforms in France, Germany and the UK respectively.

Chugai Pharma UK disclose in accordance with both The Association of British Pharmaceutical Industry (ABPI) and the Irish Pharmaceutical Healthcare Association (IPHA) as the company undertakes marketing activities in both Member States.

Chugai Pharma France disclose in accordance with Loi Bertrand via the website Ordre National Des Medecins (<http://www.sunshine-act.ordre.medecin.fr/>).

Chugai Pharma Germany voluntarily disclose in accordance with Arzneimittel und Kooperation im Gesundheitswesen (AKG) (<http://www.ak-gesundheitswesen.de/home/>).

Chugai Pharmaceutical Co. Ltd, Japan disclose in accordance with The Japan Pharmaceutical Manufacturers Association (JPMA) Code of Practice (<http://www.jpma.or.jp/english/>).

Payments made in the United States are disclose in accordance with The Physician Financial Transparency Report ('Sunshine Act') managed by Genentech (www.gene.com/).

Chugai Pharma Europe Ltd and Chugai Pharmaceutical Co. Ltd, Japan have also taken the initiative to disclose all transfers of value relating to those HCPs and HCOs who are registered to practice in European countries

where there is no Chugai office or marketing activities. Direct payments take place where a HCP has provided consultative support with regards to product development in order to give a better understanding of local treatment and regulatory needs.

For these engagements there is a contract containing clearly defined consultative role in content, context and format and any payment would be strictly controlled through standard Fair Market Value limitations (<http://transparency.efpia.eu/codes-of-conduct/countries>). 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:

Section 3.04. Research and Development Transfers of Value. Research and Development Transfers of Value in each Reporting Period shall 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 ¹.

NON-R&D PAYMENTS

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.

CONSENT FOR DISCLOSURE

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.

DATA PROTECTION

Chugai upholds and works according to Article 7 of Directive 95/46 EC on Data Protection. Where explicit consent is not given then the transfer of value will be disclosed in an aggregated form.

DISCLOSURE

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 2016 to Dec 31st 2016 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 the disclosure initiative 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 from 2016 in a format which is in accordance with local requirements (using the standard template) and supported by methodological notes outlining definitions and practices which will be provided in a commonly used local language, thus ensuring the highest level of transparency.

From 2017, where possible, Chugai will disclose via the central portal managed in each country if one is available.

2016 DISCLOSED PAYMENTS LISTED BY COUNTRY

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

Click on the country name to access the disclosed payments using the required EFPIA template.

Click on the Language to access the methodological notes in a commonly spoken local language.

Click on 'Methodological notes in English' for full detail.

Member State	Abbreviated methodological notes in local language	
Austria	German	Methodological notes in English
Belgium	Dutch	
Bulgaria	Bulgarian	
Croatia	Croatian	
Denmark	Danish	
France	French	
Germany	German	
Hungary	Hungarian	
Italy	Italian	
Netherlands	Dutch	
Poland	Polish	
Romania	Romanian	
Russia	Russian	
Spain	Spanish	
Sweden	Swedish	
Switzerland	German	
Turkey	Turkish	
Ukraine	Ukrainian	

CONTACTS

Chugai has made every effort to ensure accuracy. However, currency conversion rates may result in the disclosed figures being slightly different. To discuss any issue directly with Chugai, contact:

disclosure@chugai.eu +44 208 987 5682

Head of Compliance, Chugai Pharma Europe

LINK TO EFPIA CODE

EFPIA Code on Disclosure on Transfers of Value to Pharmaceutical Companies to Healthcare Professionals and Healthcare Organisations: <http://transparency.efpia.eu/the-efpia-code-2>