

## 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 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/IFI Disclosure Codes and all applicable data privacy regulations, the report lists the payments made to HCOs, HCPs and research and development for 2015.

## 2. EFPIA TEMPLATES

## CROATIAN VERSION

Dodatak 1 – primjer											Datum objave: 30.06.2016.	
Ime i prezime  (čl. 19.1.)	Zdravstveni radnik: Grad osobnog ili profesionalnog prebivališta ili sjedišta  (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.)  (čl. 20.1.A.(i))	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
						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		
<b>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)</b>												
Zdravstveni radnik	Dr. A				N/A	N/A						
	Dr. B				N/A	N/A						
	itd.				N/A	N/A						
	<b>OSTALO, ŠTO NIJE UKLJUČENO GORE: kada zbog postojanja pravnih zapreka podatak nije moguće objaviti pojedinačno</b>											
<b>Zbirno objavljivanje s naslova Prijenosa Vrijednosti Primateljima – čl. 20.2.</b>					N/A	N/A	116.486	152.378	22.872			291.737
<b>Ukupni broj Primatelja kod zbirne objave – čl. 20.2.</b>					N/A	N/A	91	82	4			
<b>% broja Primatelja kod zbirnog objavljivanja u odnosu na ukupni broj Primatelja – čl. 20.2.</b>					N/A	N/A	100%	100%	100%			
<b>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)</b>												
Zdravstvena organizacija	HRVATSKI LUEČNIČKI ZBOR - HRVATSKO DRUŠTVO RADIOLOGA- Sekcija za intervencijsku radiologiju	Zagreb	Hrvatska	Šubičeva 9			34.425					34.425
	HRVATSKI LUEČNIČKI ZBOR - HRVATSKO DRUŠTVO ZA ULTRAZVUK U MEDICINI I BIOLOGIJU	Zagreb	Hrvatska	Šubičeva 9			12.500					12.500
	HRVATSKO DRUŠTVO INŽENJERA MEDICINSKE RADIOLOGUE	Zagreb	Hrvatska	Minarska Cesta 38			10.000					10.000
	HRVATSKA UDRUGA ZA NEUROREHABILITACIJU I RESTAURACIJSKU I NEUROLOGIJU	Osijek	Hrvatska	J. Hutterla 4			6.250					6.250
	HRVATSKI LUEČNIČKI ZBOR - HRVATSKO SENOLOŠKO DRUŠTVO	Zagreb	Hrvatska	Šubičeva 9			4.600					4.600
<b>OSTALO, ŠTO NIJE UKLJUČENO GORE: kada zbog postojanja pravnih zapreka podatak nije moguće objaviti pojedinačno</b>												
<b>Zbirno objavljivanje s naslova Prijenosa Vrijednosti Primateljima – čl. 20.2.</b>												
<b>Ukupni broj Primatelja kod zbirne objave – čl. 20.2.</b>												
<b>% broja Primatelja kod zbirnog objavljivanja u odnosu na ukupni broj Primatelja – čl. 20.2.</b>												
<b>ZBIRNO OBJAVLJIVANJE</b>												
Istraživanje i Razvoj	Prijenos Vrijednosti u svrhu Istraživanja i Razvoja prema definiciji iz čl. 21.2.2..										0	
Σ												HRK 359 512

ENGLISH EFPIA VERSION

Schedule 2 - EFPIA 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 &amp; 3.01.2.a)</i>			Fee for service and consultancy <i>(Art. 3.01.1.c &amp; 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			
<b>INDIVIDUAL NAMED DISCLOSURE - one line per HCP</b> (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)														
INDIVIDUAL	HCPs	Dr A				N/A	N/A					N/A		
		Dr B					N/A	N/A					N/A	
		etc.					N/A	N/A					N/A	
	<b>OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons</b>													
	<b>Aggregate amount attributable to transfers of value to such Recipients - Art. 3.2</b>						N/A	N/A	116 486	152 378	22 872		N/A	291 737
	<b>Number of Recipients (named list, where appropriate) - Art. 3.2</b>						N/A	N/A	91	82	4		N/A	
	<b>% of total transfers of value to individual HCPs - Art. 3.2</b>						N/A	N/A	100%	100%	100%		N/A	
	<b>INDIVIDUAL NAMED DISCLOSURE - one line per HCO</b> (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)													
	HCOs	HRVATSKI LUEČNIČKI ZBOR - HRVATSKO DRUŠTVO RADIOLOGA- Sekcija za intervencijsku radiologiju	Zagreb	Hrvatska	Šubičeva 9			34 425					N/A	34 425
		HRVATSKI LUEČNIČKI ZBOR - HRVATSKO DRUŠTVO ZA ULTRAZVUK U MEDICINI I BIOLOGJI	Zagreb	Hrvatska	Šubičeva 9			12 500					N/A	12 500
HRVATSKO DRUŠTVO INZENJERA MEDICINSKE RADIOLOGIJE		Zagreb	Hrvatska	Minarska Cesta 38			10 000					N/A	10 000	
HRVATSKA UDRUGA ZA NEURORREHABILITACIJU I RESTAURACIJSKU I NEUROLOGIJU		Osijek	Hrvatska	J. Hutlera 4			6 250					N/A	6 250	
HRVATSKI LUEČNIČKI ZBOR - HRVATSKO SENOLOŠKO DRUŠTVO		Zagreb	Hrvatska	Šubičeva 9			4 600					N/A	4 600	
<b>OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons</b>														
<b>Aggregate amount attributable to transfers of value to such Recipients - Art. 3.2</b>												N/A		
<b>Number of Recipients (named list, where appropriate) - Art. 3.2</b>												N/A		
<b>% of total transfers of value to individual HCOs - Art. 3.2</b>												N/A	N/A	
<b>AGGREGATE DISCLOSURE</b>														
AGGREGATE	N/A	N/A	N/A	N/A	N/A		67 775	116 486	152 378	22 872			HRK 359 512	

### **3. METHODOLOGY**

The purpose of this methodology is to clarify how the EFPIA/IFI 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 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**

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 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 GEHC Croatia in accordance with the CoC of the Croatian 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/IFI Disclosure Code guidelines, all ToV relating to R&D will always be published under the dedicated aggregated value section.