

## 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 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: 18/07/2018
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.)	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>											
Vinko Vidjak	Zagreb	Hrvatska	Zajčeva 19		N/A	N/A			6022		6 022
<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	213 499	189 507		403 006
<b>Ukupni broj Primatelja kod zbirne objave – čl. 20.2.</b>						N/A	N/A	104	77		
<b>% broja Primatelja kod zbirnog objavljivanja u odnosu na ukupni broj Primatelja – čl. 20.2.</b>						N/A	N/A	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>											
Hrvatska Komora Zdravstvenih Radnika	Zagreb	Hrvatska	Ilica 229/1			2750					2 750
Hrvatski Liječnički Zbor	Zagreb	Hrvatska	Šubićeva 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
<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>											
Istraživan je i Razvoj	Prijenos Vrijednosti u svrhu Istraživanja i Razvoja prema definiciji iz čl. 21.2.2.										0
Σ						76404	213499	189507	6022		HRK 485 433

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 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			
<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	Vrsko 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 - <i>Art. 3.2</i>						N/A	N/A	213 499	189 507		N/A	403 006
		Number of Recipients (named list, where appropriate) - <i>Art. 3.2</i>						N/A	N/A	104	77		N/A	
	% of total transfers of value to individual HCPs - <i>Art. 3.2</i>						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	Šubićeva 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	Minarska 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 - <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	
<b>R&amp;D</b>														
Transfers of Value Research & Development											0			
<b>Σ</b>														
							76 404	213 499	189 507	6023			<b>HRK 485 433</b>	

### **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

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.*