

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

CROATIAN VERSION

											Datum objave: 15.07.2018.	
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 (u ime Zdravst. Organizacije)	Trošak kotizacije	Putni troškovi i troškovi smještaja	Naknada	Vezani troškovi koji su ugovoreni uz		
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)												
ANDREJ STIPANOVIĆ	ZAGREB	Hrvatska	VINOGRADSKA 29	N/A	N/A	1875	1400				3275	
ANDRIJANA JOVIĆ	ZAGREB	Hrvatska	BOŽE PERIĆICA 5	N/A	N/A	1789	3081				4870	
ANELA TOLIĆ	ZAGREB	Hrvatska	BOŽE PERIĆICA 5	N/A	N/A	2897	2897				2897	
BOŽENA ŠKOK BARISIC	ZAGREB	Hrvatska	IVANA MEŠTROVIĆA	N/A	N/A	1875	700				2575	
DAMIR PLEČKO	KRAPINSKE TOPLICE	Hrvatska	LIJUEVITA GAJA 2	N/A	N/A	1650	1290				2940	
DARIJA JAKOVAC RATKOVIC	GOSPIĆ	Hrvatska	KANJSKA 111	N/A	N/A	2749	1006				3754	
DARIJA SNAJDER	OSIJEK	Hrvatska	J. HUTTLERA 4	N/A	N/A	760	1395				2155	
DARKO DILBER	ZADAR	Hrvatska	BOŽE PERIĆICA 5	N/A	N/A	794	746				1540	
DAVORKA LULIĆ	RIJEKA	Hrvatska	TOME STRIZICA 3	N/A	N/A	3271	3271				3271	
DUNJA MIJORI	OSIJEK	Hrvatska	J. HUTTLERA 4	N/A	N/A	760	1395				2155	
DURDICA IKIĆ	PULA	Hrvatska	ZAGREBACKA 30	N/A	N/A	2749	645				3294	
ERVIN AVDOVIĆ	RIJEKA	Hrvatska	TOME STRIZICA 3	N/A	N/A	3271	3271				3271	
EUGEN DIVJAK	ZAGREB	Hrvatska	AVENIJA GOJKA	N/A	N/A	1125	1290				2415	
FRANE MARLEKU	ZAGREB	Hrvatska	VINOGRADSKA 29	N/A	N/A	1875	700				2575	
GORAN ZUBAK	ZADAR	Hrvatska	BOŽE PERIĆICA 1	N/A	N/A	1746	758				1904	
IRENA KUJURIĆ	RIJEKA	Hrvatska	KRESIMIROVA 42	N/A	N/A	390	1395				1775	
IVANA KUSERBANJ	ZAGREB	Hrvatska	VINOGRADSKA 29	N/A	N/A	1000	930				1930	
IVICA SJEKAVICA	ZAGREB	Hrvatska	KISPATICEVA 12	N/A	N/A	3327	2198				5525	
IVO ĐUMIĆ	ZAGREB	Hrvatska	AV. GOJKA SUŠKA 6	N/A	N/A	4452	4526				8978	
JADRANKA DASKIJEVIĆ	ZAGREB	Hrvatska	VINOGRADSKA 29	N/A	N/A	1000	930				1930	
JOSIP VINČELJ	ZAGREB	Hrvatska	AV. GOJKA SUŠKA 6	N/A	N/A				4930		4930	
JOVANKA VOJNOVIĆ	ZAGREB	Hrvatska	AV. GOJKA SUŠKA 6	N/A	N/A	327	2198				5525	
JULIO PIROVIĆ	VAROŽDIN	Hrvatska	IVANA MEŠTROVIĆA 1	N/A	N/A	734	746				1480	
KSENIJA GOSPOGIĆ	ZABOK	Hrvatska	BRACAK 8	N/A	N/A	1875	700				2575	
LANA POSTRUŽIN GRŠIĆ	ZAGREB	Hrvatska	VINOGRADSKA 29	N/A	N/A	1875	1400				3275	
MARJA CRNOGORAC	ZAGREB	Hrvatska	AV. GOJKA SUŠKA 6	N/A	N/A	1125	838				1963	
MARIJA SIMIĆ	ZAGREB	Hrvatska	AV. GOJKA SUŠKA 6	N/A	N/A	1650	838				2488	
MARTINA SKENDER ZIZEK	ZAGREB	Hrvatska	KISPATICEVA 12	N/A	N/A	2749	1006				3754	
MARTINA ZIDANIĆ	ZAGREB	Hrvatska	KISPATICEVA 12	N/A	N/A	2697	1006				3903	
MELITA RUPČIĆ	ZAGREB	Hrvatska	KISPATICEVA 12	N/A	N/A	4074	2198				6272	
MILJENKO NOVAK	ČAKOVEC	Hrvatska	I.G. KOVACICA 1e	N/A	N/A	2749	1437				4186	
MIROSLAV MIJŠIĆ	ZAGREB	Hrvatska	KISPATICEVA 12	N/A	N/A	2377	2443				4819	
NIKO RADOVIĆ	ZAGREB	Hrvatska	AV. GOJKA SUŠKA 6	N/A	N/A	1875	1400				3275	
RATIMIR PETROVIĆ	ZAGREB	Hrvatska	KISPATICEVA 12	N/A	N/A	760	2142				2902	
RENATA HUIZIAN KORUNIĆ	ZAGREB	Hrvatska	AV. GOJKA SUŠKA 6	N/A	N/A	1875	775				2650	
SANJA BARIŠIĆ OSTOJIC	ZAGREB	Hrvatska	KISPATICEVA 12	N/A	N/A	2430	8096				10526	
SIME BEROVIĆ	SIBENIK	Hrvatska	STJEPANA RADICA 83	N/A	N/A	1650	1290				2940	
SNJEŽANA MAJETIĆ	RIJEKA	Hrvatska	KRESIMIROVA 42	N/A	N/A	380	1395				1775	
SONJA RAC	RIJEKA	Hrvatska	KRESIMIROVA 42	N/A	N/A	483					483	
SUNČANA DIVOŠEVIĆ	ZAGREB	Hrvatska	VOCARSKA 106	N/A	N/A		3300				3300	
SUZANA DESNIČKA PANJAN	SISAČ	Hrvatska	J. J. STROSSMAYERA	N/A	N/A	1875	1400				3275	
TATJANA BOGOVIĆ CRNČIĆ	RIJEKA	Hrvatska	KRESIMIROVA 42	N/A	N/A	2038					2038	
TATJANA CIGVARA PEČINA	ZAGREB	Hrvatska	AV. GOJKA SUŠKA 6	N/A	N/A	6202	2973				8175	
TATJANA SAMARDŽIĆ	ZAGREB	Hrvatska	KISPATICEVA 12	N/A	N/A	760	2142				2902	
TONGI MIŠEVIĆ	ZAGREB	Hrvatska	AV. GOJKA SUŠKA 6	N/A	N/A	1875	1400				3275	
VALENTINA OSMANAGIĆ	OSIJEK	Hrvatska	JOSIPA HUTTLERA 4	N/A	N/A	1146					1146	
VINKA BABIĆ	ZAGREB	Hrvatska	KISPATICEVA 12	N/A	N/A	4074	2198				6272	
ZDENKA PROTIC	DUBROVNIK	Hrvatska	ROKA MISETICA 2	N/A	N/A	1000					2965	
ZDRAVKA KRIVIĐIĆ	OSIJEK	Hrvatska	JOSIPA HUTTLERA 4	N/A	N/A	2749	1006				3754	
ZORICA TODIĆ	VUKOVAR	Hrvatska	ZUPANIJSKA UL. 35	N/A	N/A	2749	1437				4186	
OSTALO, ŠTO NIJE UKLJUČENO GORE: kada zbog postojanja pravne zapreka podatak nije moguće objaviti pojedinačno												
Zbirno objavljivanje s naslova Prijenosa Vrijednosti Primateljima – čl. 20.2..						N/A	N/A	125072	188636			313709
Ukupni broj Primatelja kod zbirne objave – čl. 20.2..						N/A	N/A	38	46			
% broja Primatelja kod zbirnog objavljivanja u odnosu na ukupni broj Primatelja – čl. 20.2..						N/A	N/A	44%	53%			
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)												
HRVATSKI LIJEČNIČKI ZBOR	Zagreb	Hrvatska	ŠUBIČEVA 9			14000					14000	
KLINIČKI ZAVOD ZA DIJAGNOSTIKU I INTERVENCIJSKU RADIOLOGIJU	Zagreb	Hrvatska	ZAJCEVA 19			3800					3800	
HRVATSKO RADIOLOŠKO DRUŠTVO	Zagreb	Hrvatska	ŠUBIČEVA 9			8750					8750	
HRVATSKO DRUŠTVO NUKLEARNE MEDICINE	Zagreb	Hrvatska	KISPATICEVA 12			10000					10000	
HRVATSKO KARDIOLOŠKO DRUŠTVO	Zagreb	Hrvatska	KISPATICEVA 12			11250					11250	
OSTALO, ŠTO NIJE UKLJUČENO GORE: kada zbog postojanja pravne 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..												
Prijenos Vrijednosti u svrhu Istraživanja i Razvoja prema definiciji iz čl. 21.2.2..											0	
HRK 535,605												

ENGLISH EPPIA VERSION

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 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)												
ANDREJ STIPANOVIC	DUBROVNIK	Hrvatska	ROKA MSETICA 1		N/A	N/A	1875	1400				3275
ANDRIJANA JOVIC	ZAGREB	Hrvatska	VINOGRADSKA 29		N/A	N/A	1789	3081				4870
ANEELA TOLIC	ZADAR	Hrvatska	BOZE PERICICA 5		N/A	N/A	2897					2897
BOZENA SKOK BARISIC	VARAZDIN	Hrvatska	IVANA MESTROVICA BB		N/A	N/A	1875	700				2575
DAMIR PLECKO	ZAGREB	Hrvatska	LJUDEVITA GAJA 2		N/A	N/A	1650	1290				2940
DARIJA JAKOVAC RATKOVIC	GOSPIC	Hrvatska	KANISKA 111		N/A	N/A	2749	1006				3754
DARIJA SNAJDER	OSIJEK	Hrvatska	J. HUTTLERA 4		N/A	N/A	760	1395				2155
DARKO DILBER	ZADAR	Hrvatska	BOZE PERICICA 5		N/A	N/A	794	746				1540
DAVORKA LULIC	RJUEKA	Hrvatska	TOME STRIZICA 3		N/A	N/A	3271					3271
DUNJA MUDRI	OSIJEK	Hrvatska	J. HUTTLERA 4		N/A	N/A	760	1395				2155
DURDICA IKIC	PULA	Hrvatska	ZAGREBACKA 30		N/A	N/A	2749	545				3294
ERVIN AVDOVIC	RJUEKA	Hrvatska	TOME STRIZICA 3		N/A	N/A	3271					3271
EUGEN DIVJAK	ZAGREB	Hrvatska	AVENUE GOJKA ŠUŠKA 6		N/A	N/A	1125	1290				2415
FRANE MARLEKU	ZAGREB	Hrvatska	VINOGRADSKA 29		N/A	N/A	1875	700				2575
GORAN ZUBAK	ZADAR	Hrvatska	BOZE PERICICA 1		N/A	N/A	1146	758				1904
IRENA KUJURIC	RJUEKA	Hrvatska	KRESIMIROVA 42		N/A	N/A	380	1395				1775
IVANA KUSERIBANJ	ZAGREB	Hrvatska	VINOGRADSKA 29		N/A	N/A	1000	930				1930
IVICA SJEKAVICA	ZAGREB	Hrvatska	KISPATICEVA 12		N/A	N/A	3327	2198				5525
IVO DUMIC CULE	ZAGREB	Hrvatska	AV.GOJKA ŠUŠKA 6		N/A	N/A	4452	4526				8978
JADRANKA DASKLJEVIC	ZAGREB	Hrvatska	VINOGRADSKA 29		N/A	N/A	1000	930				1930
JOSIP VINCELJ	ZAGREB	Hrvatska	AV. GOJKA ŠUŠKA 6		N/A	N/A			4930			4930
JOVANKA VOJNOVIC	ZAGREB	Hrvatska	AV.GOJKA ŠUŠKA 6		N/A	N/A	3327	2198				5525
JULIO PIROVIC	VARAZDIN	Hrvatska	IVANA MESTROVICA 1		N/A	N/A	794	746				1540
KSENJA GOSPOVIC	ZABOK	Hrvatska	BRACAK 8		N/A	N/A	1875	700				2575
LANA POSTRUZIN GRŠIC	ZAGREB	Hrvatska	VINOGRADSKA 29		N/A	N/A	1875	1400				3275
MAJA CRNOGORAC	ZAGREB	Hrvatska	AV. GOJKA ŠUŠKA 6		N/A	N/A	1125	838				1963
MARIJA ŠIMIC	ZAGREB	Hrvatska	AV.GOJKA ŠUŠKA 6		N/A	N/A	1650	838				2488
MARTINA SKENDER ZIZEK	ZAGREB	Hrvatska	KISPATICEVA 12		N/A	N/A	2749	1006				3754
MARTINA ZIDANIC	ZAGREB	Hrvatska	KISPATICEVA 12		N/A	N/A	2897	1006				3903
MELITA RUPCIC	ZAGREB	Hrvatska	KISPATICEVA 12		N/A	N/A	4074	2198				6272
MILJENKO NOVAK	ČAKOVEC	Hrvatska	I.G. KOVACICA 1e		N/A	N/A	2749	1437				4186
MIROSLAV MURŠIĆ	ZAGREB	Hrvatska	KISPATICEVA 12		N/A	N/A	2377	2443				4819
NIKO RADOVIC	ZAGREB	Hrvatska	AV. GOJKA ŠUŠKA 6		N/A	N/A	1875	1400				3275
RATIMIR PETROVIC	ZAGREB	Hrvatska	KISPATICEVA 12		N/A	N/A	760	2142				2902
RENATA HUZZJAN KORUNIC	ZAGREB	Hrvatska	AV. GOJKA ŠUŠKA 6		N/A	N/A	1875	775				2650
ŠANJJA BARŠIĆ OSTOJIC	ZAGREB	Hrvatska	KISPATICEVA 12		N/A	N/A	2430	8096				10526
ŠIME BERVOVIC	SIBENIK	Hrvatska	STJEPANARADICA 83		N/A	N/A	1650	1290				2940
SNJEZANA MAJETIC	RJUEKA	Hrvatska	KRESIMIROVA 42		N/A	N/A	380	1395				1775
SONJA RAC	RJUEKA	Hrvatska	KRESIMIROVA 42		N/A	N/A	483					483
SUNCANA DIVOŠEVIĆ	ZAGREB	Hrvatska	VOČARSKA 106		N/A	N/A		3300				3300
SUZANA DEŠNICA PANJAN	SISAK	Hrvatska	J.J. STROSSMAYERA 59		N/A	N/A	1875	1400				3275
TATJANA BOKOVIĆ CRNGIĆ	RJUEKA	Hrvatska	KRESIMIROVA 42		N/A	N/A	2038					2038
TATJANA CIGVARA PECINA	ZAGREB	Hrvatska	AV.GOJKA ŠUŠKA 6		N/A	N/A	5202	2973				8175
TATJANA SAMARDŽIĆ	ZAGREB	Hrvatska	KISPATICEVA 12		N/A	N/A	760	2142				2902
TONCI MIŠEVIĆ	ZAGREB	Hrvatska	AV.GOJKA ŠUŠKA 6		N/A	N/A	1875	1400				3275
VALENTINA OSMANAGIĆ	OSIJEK	Hrvatska	JOSIPA HUTTLERA 4		N/A	N/A	1146					1146
VINKA BABIĆ	ZAGREB	Hrvatska	KISPATICEVA 12		N/A	N/A	4074	2198				6272
ZDENKA PROTIC	DUBROVNIK	Hrvatska	ROKA MSETICA 2		N/A	N/A	1000	1965				2965
ZDRAVKA KRIVDIĆ	OSIJEK	Hrvatska	JOSIPA HUTTLERA 4		N/A	N/A	2749	1006				3754
ZORICA TODIĆ	VUKOVAR	Hrvatska	ZUPANJSKA UL. 35		N/A	N/A	2749	1437				4186
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	125072	188636			N/A	313709
Number of Recipients (named list, where appropriate) - Art. 3.2					N/A	N/A	38	46			N/A	
% of total transfers of value to individual HCPs - Art. 3.2					N/A	N/A	44%	53%			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)												
HRVATSKI LJEČNIČKI ZBOR	Zagreb	Hrvatska	ŠUBIČEVA 9				14000					14000
REPUBLICANSKI FIZIOLOGIJSKI I INTERVENCIJSKI LABORATORIJI	Zagreb	Hrvatska	ZAJCEVA 19				3800					3800
HRVATSKO RADIOLOŠKO DRUŠTVO	Zagreb	Hrvatska	ŠUBIČEVA 9				8750					8750
HRVATSKO DRUŠTVO NUKLEARNE MEDICINE	Zagreb	Hrvatska	KISPATICEVA 12				10000					10000
HRVATSKO KARDIOLOŠKO DRUŠTVO RADNA SKUPINA ZA	Zagreb	Hrvatska	KISPATICEVA 12				11250					11250
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
Transfers of Value Research & Development											0	
HRK 535,605												

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.