



## **Disclosure of Transfers of Value in Switzerland for 2019**

### **Methodological Note**

## Methodological Note

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 23 and 24 of the EFPIA Code of practice.

### 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 Code of practice:

*“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, deliver or use medical products for human (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 Code of practice:

*“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 Code of practice, Research and Development activities correspond to:

- Non-Clinical Studies (laboratory),
- Clinical Trials,
- Non-interventional Studies (NIS) that are prospective in nature and that involve the collection of patient data from or on behalf of individual, or groups of, HCPs specifically for the study.

All non-interventional studies that do not fall within the scope of “prospective studies”, publication is made on a nominative basis. As such, retrospective studies will be disclosed under the “consultancy / fee for services” category of the disclosure template. In case it is not possible to distinguish between prospective and retrospective non-interventional studies, the disclosure of all NIS will be on an individual basis.

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. For Transfers of Values provided to Patient Organizations in relation with Research and Development activities, please see section 1.2.4.

### 1.2.4. Transfers of Values related to Patient Organizations

Transfers of Values disclosed by our Company consist in:

- Financial support
- Significant non-financial support
- Contracted services

⇒ When provided, paid or reimbursed to Patient Organizations or for their benefit, either directly or indirectly. Transfers of Values provided to Patient Organizations are disclosed on nominative basis, even when related to Research and Development activities.

### 1.2.5. Transfers of Values related to Professional congress organizers (PCO)

Transfers of values disclosed by our Company consist in contribution to costs related to events organized through PCO, such as:

- Registration fees;
- Travel and accommodation
- Speaker fees
- Sponsorship agreements with HCOs or with Third Parties appointed by an HCO to manage an Event

## 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 1<sup>st</sup> January to 31<sup>st</sup> December).

## **2. Disclosure Scope**

### **2.1. Products Concerned**

The Transfers of Values related solely to activities in connection with Over-The-Counter products are out of the scope of 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 activities solely related to Over-the-counter pharmaceutical products,
- 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. Disclosure format of Transfer of Value to Patient Organizations**

For supports:

- The disclosure format includes a description of the nature of the support, the monetary value of financial support and of invoiced costs.
- For significant nonfinancial support that cannot be assigned a meaningful monetary value, the description describes the non-monetary benefit that the Patient Organization receives.

For contracted services: the total amount paid per Patient Organization over the Reporting Period is disclosed.

## **2.6. Disclosure format of Transfer of Values through PCO**

Contributions provided to Events through PCOs (organized whether through their own initiatives or at a request of a HCO – that would therefore be the direct Recipient of the Transfer of Values) must be considered as indirect Transfer of Values and be reported on an individually named basis.

Transfer of Values through PCOs are reported in the name of benefitting HCO / HCP through the PCO.

The full value of the Transfer of Values provided through the PCO shall not be deemed as a benefit (in cash or in kind) to the HCO as the PCO may retain a part of this amount as “service fee”.

## **2.7. 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.

## **2.8. 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 Code of Practice.

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 VAT excluded.

## **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: 06/26/2020

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

## **6.2. Reporting Year**

The publication has been prepared in accordance with the Swiss methodological note and the requirements of Scienceindustries. The interactions listed in this document include all transfers of values made each year from 1<sup>st</sup> January to 31 December by all companies of the Servier Group locally or from foreign countries.

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:

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

For Patient Organizations:

- <https://www.servier.ch/de/engagements/patientenorganisationen/> in German
- <https://www.servier.ch/fr/engagements/organisations-de-patients-1/> in French

## **6.4. Disclosure Language**

The publication is provided in English, German and French.