

# Transfers of Value to Healthcare Professionals (HCPs) and Healthcare Organizations (HCOs) for those countries for which there is an EFPIA member association and that do not have national portals

## Responsibility

The disclosure initiative requires companies to disclose payments, collaborations and other Transfers of Value (ToV) made to Healthcare Professionals (HCPs) and Healthcare Organizations (HCOs). The type of collaborations includes registering and attending medical conferences; taking part in clinical trials and research; patient education and awareness initiatives as well as details of specific interactions such as research and medical grants.

## Payments to Healthcare Professionals

The EFPIA (European Federation of Pharmaceutical Industries and Associations) Code requires companies to report the following payments made to HCPs and HCOs:

### *For Transfers of Value to a HCO*

- Donations and Grants to HCOs that support healthcare, including donations and grants (either cash or benefits in kind) to institutions, organizations or associations that are comprised of HCPs and/or that provide healthcare services (governed by Article 11 of the EFPIA HCP Code).
- Contribution to costs related to Events through HCOs or third parties, including sponsorship to HCPs to attend events, such as:
  - Registration fees;
  - Sponsorship agreements with HCOs or with third parties appointed by a HCO to manage an event; and
  - Travel and accommodation (to the extent governed by Article 10 of the EFPIA HCP Code.)
- Fees received in consideration for Consultancy Services and/or Transfers of Value resulting from or related to a contract between the Company and institutions, organizations or associations of HCPs under which such institutions, organizations or associations provide any type of services to the Company (or any other fees not covered in the previous categories). Fees and Transfers of Value (e.g. related expenses reimbursed to or paid on behalf of the institutions, organizations or associations of HCPs as agreed in the consultancy agreement) will be disclosed as two separate amounts.

### *For Transfers of Value to a HCP*

- Contribution to costs related to Events, such as:
  - Registration fees; and

- Travel and accommodation (to the extent governed by Article 10 of the EFPIA HCP Code.)
- Fees received in consideration for consultancy services and/or Transfers of Value resulting from or related to a contract between the Company and HCPs under which such HCPs provide any type of services to the Company (or any other fees not covered in the previous categories). Fees and Transfers of Value (e.g. related expenses reimbursed to or paid on behalf of the HCP) will be disclosed as two separate amounts.

## **Aggregate Disclosure**

For Transfers of Value where certain information, which can be otherwise reasonably allocated to one of the categories set forth in Section 3.01 of the EFPIA Code, cannot be disclosed on an individual basis for legal reasons, the Company shall disclose the amounts attributable to such Transfers of Value in each Reporting Period on an aggregate basis.

## **Research and Development Transfers of Value**

Research and Development Transfers of Value in each Reporting Period shall be disclosed on an aggregate basis.

## **Countries**

In line with local Transparency Reporting requirements, Concordia International is disclosing its interactions with Healthcare Professionals and Healthcare Organizations

Concordia International is disclosing data on its website only for countries that do not have national portals. Whilst the information is correct at the time of publishing (30<sup>th</sup> June 2018), it may be subject to change as required.