

Disclosure of transfers of value across Europe

Payments made in 2015

Chugai Pharma Europe Ltd and Chugai Pharmaceutical Co. Ltd, Japan disclose all relevant transfers of value to HCPs and HCOs made in the European Union in accordance with the EFPIA Disclosure Code and the relevant local Codes of Practice and/or local legal requirements, and also in accordance with Data Protection regulations (including but not limited to the EU Data Protection Directive 95/46/EC and local legislation).

The move towards greater transparency is part of a Europe-wide initiative designed to bring clarity and transparency to the manner in which the research based pharmaceutical industry and the healthcare community collaborate, which ultimately benefits patient care. The healthcare profession offers invaluable expertise on disease management and plays an important part in informing the pharmaceutical industry's efforts to improve patient care and treatment – both critical to improving health outcomes.

It's important that these interactions meet the highest standard of integrity that patients, governments, regulatory bodies, other stakeholders and the media expect. Our goal is to assure the public that such relationships do not influence clinical decisions and that they can trust their HCP to recommend treatment, or administer appropriate care based solely on clinical evidence and experience.

Chugai Pharma Europe Ltd and Chugai Pharmaceutical Co. Ltd, Japan support the initiative by The European Federation of Pharmaceutical Industries and Associations (EFPIA) (<http://www.efpia.eu/>) and has taken the decision to disclose all transfers of value in keeping with the EFPIA Code on Disclosure on Transfers of Value to Pharmaceutical Companies to Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs) (<http://transparency.efpia.eu/the-efpia-code-2>) for both direct and indirect payments made across the European Union from any part of the Chugai corporation.

The local payments by each Chugai affiliate separately disclose via central platforms in France, Germany and the UK.

Chugai Pharma UK disclose in accordance with both The Association of British Pharmaceutical Industry (ABPI) and the Irish Pharmaceutical Healthcare Association (IPHA) as the company undertakes marketing activities in both Member States.

Chugai Pharma France disclose in accordance with Loi Bertrand via the website Ordre National Des Medecins (<http://www.sunshine-act.ordre.medecin.fr/>).

Chugai Pharma Germany voluntarily disclose in accordance with Arzneimittel und Kooperation im Gesundheitswesen (AKG) (<http://www.ak-gesundheitswesen.de/home/>).

Chugai Pharmaceutical Co. Ltd, Japan disclose in accordance with The Japan Pharmaceutical Manufacturers Association (JPMA) Code of Practice (<http://www.jpma.or.jp/english/>).

Payments made in the United States are disclose in accordance with The Physician Financial Transparency Report ('Sunshine Act') managed by Genentech (www.gene.com/).

Chugai Pharma Europe Ltd and Chugai Pharmaceutical Co. Ltd, Japan have also taken the initiative to disclose all transfers of value relating to those Healthcare Professionals and Healthcare Organisations who are registered to practice in EU Member States where there is no Chugai office or marketing activities. Direct payments take place where a HCP has provided consultative support with regards to product development in order to give a better understanding of local treatment and regulatory needs. For these engagements there is a contract containing clearly defined consultative role in content, context and format and any payment would be strictly controlled through standard Fair Market Value limitations (<http://transparency.efpia.eu/codes-of-conduct/countries>).

Such engagements would include attendance to advisory boards meetings or speaking at a company-sponsored event. Indirect payments take place during the research and development phase where responsibility for managing a clinical trial has been outsourced to a Clinical Research Organisation (CRO). The CRO are responsible for making these payments, and Chugai is responsible for ensuring such indirect payments are disclosed accurately. Payments relating to research and development are be disclosed in an aggregated form in accordance with EFPIA requirements:

Section 3.04. Research and Development Transfers of Value. Research and Development Transfers of Value in each Reporting Period shall be disclosed by each Member Company on an aggregate basis. Costs related to events that are clearly related to activities covered in this section can be included in the aggregate amount under the "Research and Development Transfers of Value" category ¹.

Payments relating to activities that do not fit the criteria of research and development are disclosed at an individual level. Payments made by Chugai Pharma Europe Ltd and Chugai Pharmaceutical Co. Japan will also be made in the non R&D setting where a therapy area specialist may be invited to provide advice at an advisory board or attend a company-sponsored event as a speaker.

In most EU Member States explicit consent is a fundamental requirement in order to disclose at a named individual level which captures payments relating to

- the contribution of costs related to events (e.g. travel, accommodation) and includes sponsorship
- fees for service and consultancy.

Chugai upholds and works according to Article 7 of Directive 95/46 EC on Data Protection. Where explicit consent is not given then the transfer of value will be disclosed in an aggregated form.

Chugai encourages all transfers of value to be disclosed in a form that is transparent and will disclose according to the requirements of each Member State.

Payments made to Healthcare Organisations are all disclosed at a named institutional level.

The disclosed payments are in local currency where possible. The information given relates to payments made in the financial year Jan 1st 2015 to Dec 31st 2015 and relates to the dates of payments rather than event dates. The EFPIA Code requires disclosure in the country where the Recipient has its principal practice.

All Transfers of Value to a given Recipient will be disclosed in the country where this Principal Practice is located. The EFPIA Code states that each Member Company will decide how to organise its disclosures, either at a central or local level, unless the national code fixes the platform of disclosure.

However, disclosure should conform to the national code requirements and relevant disclosures should be publicly accessible in the country where the Recipient has their practice.

If a Member Company is not resident or does not have a subsidiary or an affiliate in the country where the Recipient has their principal practice, the Member Company should disclose the Transfer of Value in a manner consistent with the national code of the country where the Recipient has their practice. This information will be publicly available for 3 (three) years and stored for a minimum of 5 (five) years. Chugai does not support partial disclosure.

Chugai supports these initiatives and will adhere to the relevant Codes of Practice. This is a progressive initiative with the objective for Chugai to disclose all transfers of value from 2016 in a format which is in accordance with local requirements (using the standard template) and where possible via a central portal managed in each Member State and supported by methodological notes outlining definitions and practices which will be provided in each local language, thus ensuring the highest level of transparency.

Payments made to individuals (aggregated)**R&D activities**

Member State	Currency	Total	Number of Engagements
Belgium	EURO	5,000.00	6
Germany	EURO	28,022.69	43
Hungary	EURO	4,658.15	35
Poland	EURO	829.23	26
Spain	EURO	3,107.98	59
Sweden	EURO	17,743.94	8
UK	GBP	3,788.71	6

Non R&D activities

Member State	Currency	Total	Number of Engagements
Belgium	EURO	14,959.93	6
France	EURO	47,750.47	53
Germany	EURO	68,377.54	41
Spain	EURO	8,407.92	9
UK	GBP	70,112.20	33
Netherlands (The)	EURO	19,717.80	16

Payments to HCOs (R&D)

Member State	Currency	Total	Number of Hospitals
Italy	EURO	47,838.00	6
Poland	PLN	480,313.11	17
Spain	EURO	14,986.00	3
Germany	EURO	196,834.00	16
Denmark	DKK	37,750.00	1
UK	GBP	51,880.09	5
Hungary	HUF USD	22,000.00 3,927.72	2

Payments to HCOs made by Chugai Pharmaceutical Co. Ltd, Japan

Member State	Currency	Amount	Payee	Nature of the payment
Switzerland	JPY	200,000.00	<u>Spitaeler fmi Interlaken Spitalapotheke</u>	Site Visit Training for MR
Germany	EUR	17,500.00	<u>University Hospital Aachen</u>	Research Collaboration
Switzerland	EUR	21,000.00	<u>kenes international organizer of Congresses Ltd</u>	ILS-Sponsorship package-Gold 10th International Congress on Autoimmunity
Denmark	EUR	10,000.00	<u>Nordic Bioscience A/S</u>	Contract Research
Austria	EUR	75,000.00	<u>11th International Congress on Syytemic Lupus Erythematosus</u>	Exhibition fee in Congress
Switzerland	USD	2,000.00	<u>BioMedical Transporters Conference 2015</u>	Sponsorship
Switzerland	USD	15,000.00	<u>Interpharma</u>	Donation
Germany	EUR	69,000.00	<u>Ruhr-University Bochum St.Josef-Hospital</u>	Grant
Germany	EUR	40,680.00	Klinikum der Ludwig-Maximilians-Universitat Munchen	Grant

Chugai has made every effort to ensure accuracy. However, currency conversion rates may result in the disclosed figures being slightly different.

To discuss any issue directly with Chugai, contact disclosure@chugai.eu

Head of Compliance, Chugai Pharma Europe

1. EFPIA Code on Disclosure on Transfers of Value to Pharmaceutical Companies to Healthcare Professionals and Healthcare Organisations (<http://transparency.efpia.eu/the-efpia-code-2>)