

Tillotts Pharma Transfers of Value in 2021 to Italian Healthcare Professionals and Healthcare Organisations

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	Full Name (Art. 1.01)	HCPs: City of Principal Practice HCOs: city where registered (Art. 3)	Country of Principal Practice (Schedule 1)	Principal Practice Address (Art. 3)	Unique country local identifier OPTIONAL (Art. 3)	Donations and Grants to HCOs (Art. 3.01.1.a)	Contribution to costs of Events (Art. 3.01.1.b & 3.01.2.a)			Fee for service and consultancy (Art. 3.01.1.c & 3.01.2.c)		Transfer of Value re Research & Development as defined (Art. 3.04)	Total OPTIONAL	
							Sponsorship agreements with HCOs / third parties appointed by HCOs to manage an Event	Registration Fees	Travel & Accommodation	Fees	Related expenses agreed in the contract, including travel & accommodation relevant to the contract			
HCPs	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)													
						N/A						N/A	N/A	
						N/A						N/A	N/A	
	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				€ 4'335.00		N/A	N/A
	Number of Recipients (named list, where appropriate) - Art. 3.2						N/A				2		N/A	N/A
	% of totaltransfers of value to indidual HCPs - Art. 3.2.						N/A				100%		N/A	N/A
% on total of Recipients - Art. 3.02						N/A				100%		N/A	N/A	
HCOs	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)													
												N/A	N/A	
	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										€ 3'200.00		N/A	N/A
	Number of Recipients (named list, where appropriate) - Art. 3.2										1		N/A	N/A
% of totaltransfers of value to indidual HCOs - Art. 3.2.										100%		N/A	N/A	
R & D	AGGREGATE DISCLOSURE													
	Research & Development Transfers of Value											N/A	N/A	

Methodological Notes

Disclosure by Tillotts Pharma of payments to Italian healthcare professionals and healthcare organisations in 2021

The Farmindustria Code on disclosure of transfers of value from companies to healthcare professionals and healthcare organisations mandates the public disclosure in 2022 of certain transfers of value made during 2021 to Italian healthcare professionals and healthcare organisations. The disclosure data will be published on the website of Tillotts Pharma, www.tillotts.com. The Farmindustria disclosure requirements are set forth in Section 5 of the Code of Conduct for the Pharmaceutical Industry.

The methodological notes below explain the data Tillotts Pharma has disclosed and how the data has been prepared, to assist the reader's understanding. Inclusion of this methodological note alongside the disclosure data is also mandated by Paragraph 5.10 of Section 5 to the Farmindustria Code.

VAT

VAT is excluded from all disclosures of transfer of value.

Currency

All disclosures are made in Euros (€). Where the original payment was made in another currency, the sum was converted to Euros based on the average annual exchange rate published by the European Central bank (www.ecb.europa.eu).

Consolidated Disclosures of the Corporate Group and Cross-border Payments

The disclosures represent the consolidated transfers of value made by the Tillotts Pharma corporate group in line with the EFPIA Disclosure Code's dictate that separate entities belonging to the same multinational company (which could be the parent company and subsidiary company) shall be deemed to constitute a single company. The 2021 disclosures represent payments by Tillotts Pharma AG, directly or indirectly.

Aggregated Data

Where permission to disclose transfers of value has been refused by individual healthcare professionals, or where permission was granted but then later revoked, all transfers of value made to them are disclosed in an aggregated fashion.

Data Protection

Consent to disclose data

In countries where it is required by applicable data protection laws, Tillotts has taken all reasonable steps to obtain consents from the HCPs, and HCOs, as applicable, to publicly disclose payments and other transfers of value. In accordance with EFPIA guidance, partial consents are not acceptable. If consent is not provided, the data will be reported on an aggregate level only.

Consent collection and withdrawal

Tillotts respects applicable data protection laws. If a stakeholder withdraws the provided consent, Tillotts will adjust the publication accordingly within a reasonable time.

Data included

The data disclosed by Tillotts Pharma is consistent with the requirements of the Farindustria Code. The data can be categorised as follows:

Sponsorship agreements with HCOs / third parties appointed by HCOs to manage an Event

Disclosed data includes payments to healthcare organisations that represent a contribution of costs related to an event. Such data includes the following types of payments paid to the healthcare organisations or to a third party appointed by the healthcare organisation to organize an event: fees for exhibition/booth space at an event; fees for event exhibition badges and event registration fees, in each case for Tillotts Pharma staff and, when applicable, other non-HCP individuals; fees related to advertising at an event; and sponsorship fees related to an event or satellite symposium at an event.

Donations, grants and benefits to healthcare organisations

Disclosed data includes transfers of value healthcare organisations such as donations or grants to healthcare organisations that support healthcare, and the contribution of costs related to a scientific-professional meeting, congress, conference or similar event.