Novartis Methodological Note

on Disclosure of Payments and other Transfers of Values to Health Care Professionals and Health Care Organizations following the ‘EFPIA Code on Disclosure of Transfers of Value’

Country: Cyprus
Division: Sandoz
Last Update: May 2017
Version: 1.0 this document replaces previous drafts and editions.
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1. Reference to National Transparency Laws and Regulations

Novartis supports laws and regulations that promote transparency around relationships between healthcare companies, Healthcare Professionals (HCPs) and Healthcare Organizations (HCOs) associated with Transfers of Value (ToVs) related to prescription-only medicines by establishing a single, consistent transparency standard in Europe for disclosing ToVs across its divisions and European countries, by following the EFPIA transparency requirements and requirements set in local transparency laws.

As a Novartis Company, Sandoz Cyprus complies with the obligation to collect, disclose and report ToVs related to prescription-only medicines to HCPs/HCOs in accordance with the:

- EFPIA Code On Disclosure Of Transfers Of Value From Pharmaceutical Companies To Healthcare Professionals And Healthcare Organizations>

In addition, Sandoz Cyprus is also disclosing ToVs related to OTC medicines and food supplements.

2. Purpose of the Methodological Note

This document is intended to serve as supporting documentation for the EFPIA disclosure report of Sandoz in Cyprus. Sandoz Cyprus’s position is based on the interpretation of the current version of the EFPIA Disclosure Code, aligned with local transparency laws.

The Methodological Note summarizes the disclosure recognition methodologies and business decisions as well as country specific considerations applied by Sandoz Cyprus in order to identify, collect and report ToVs for each disclosure category as described in Section 3.01 of the EFPIA Disclosure Code.

3. Novartis’ Commitment and Responsibility for Disclosure

Novartis supports laws and regulations that promote transparency around relationships between healthcare companies and HCPs/HCOs associated with ToVs related to prescription-only medicines, OTC medicines and food supplements.
Novartis establishes a single, consistent transparency standard for disclosing ToVs in all EFPIA countries.

4. Scope of the Novartis’ Disclosure on Transfers of Value

No Transfers of Values occurred in 2016 and thus no Transfers of Values are reportable for the disclosure cycle 2017 for Sandoz Cyprus.

Scope overview in case Transfers of Values would occur:

This 2017 Sandoz Cyprus Disclosure Report is following the disclosure standards pursuant to the local transposition of EFPIA Disclosure Code and national transparency laws/regulations. Subject to this disclosure report are all direct or indirect ToVs related to prescription-only medicines, OTC medicines and food supplements disclosed by Sandoz Cyprus to or for the benefit of a Recipient made by any Novartis affiliate as described in Article 3 of the EFPIA Disclosure Code.

The legal definition of ‘prescription-only medicine’ is pursuant to the EFPIA Disclosure Code. ToVs related to a group of products that includes prescription-only medicines (e.g. combination products/diagnostics and medicinal products) are reported in total following the disclosure requirements of the EFPIA Disclosure Code.

In summary, this 2017 Sandoz Cyprus Disclosure EFPIA Report covers direct and indirect ToVs, payments, in kind or otherwise, made to HCPs/HCOs in connection with the development and sale of prescription-only medicinal products OTC medicines and food supplements exclusively for human use, whether for promotional purposes or otherwise.

Sandoz Cyprus disclosure is performed for the full calendar year 2016.