Novartis Methodological Note

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: Luxembourg
Division: Sandoz
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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 an affiliate of Novartis Pharma AG, which is an EFPIA Member Company, Sandoz NV-SA complies with the obligation to collect, disclose and report ToVs related to prescription-only medicines to HCPs/HCOs in accordance with the National transposition of the EFPIA Code On Disclosure Of Transfers Of Value From Pharmaceutical Companies To Healthcare Professionals And Healthcare Organizations1, as laid down in Art 32 of the Code of Deontology of Mdeon asbl-vzw and chapter 5bis of the Code of Deontology of Association Pharmaceutique Luxembourgoise (APL).

In addition to this Sandoz NV-SA is also disclosing ToVs related to OTC medicines, if applicable.

Sandoz NV-SA has developed HCP/HCO unique identifiers to ensure that the identity of the HCP/HCO benefitting from the ToVs is clearly distinguishable for each Novartis affiliate.

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1 A definition on the terms “HCP/HCO” and “ToVs” is provided in chapter 9 of this document.
2 The EFPIA Code On Disclosure Of Transfers Of Value From Pharmaceutical Companies To Healthcare Professionals And Healthcare Organization (in short: EFPIA Disclosure Code) states in Section 3.05. Methodology that “each Member Company shall publish a note summarizing the methodologies used by it in preparing the disclosures and identifying Transfers of Value for each category described in Section 3.01. The note, including a general summary and/or country specific considerations, shall describe the recognition methodologies applied, and should include the treatment of multi-year contracts, VAT and other tax aspects, currency aspects and other issues related to the timing and amount of Transfers of Value for purposes of this Code, as applicable”.
2. Purpose of the Methodological Note

This document is intended to serve as supporting documentation for the 2017 Disclosure Report of Sandoz NV-SA. Sandoz NV-SA’s position is based on the interpretation of the currently valid version of the EFPIA Disclosure Code, aligned with local transparency laws and locally transposed EFPIA disclosure code.

It summarizes the disclosure recognition methodologies and business decisions as well as country specific considerations applied by Sandoz NV-SA 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 transfers of value in all EFPIA countries.

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

No Transfer of Values occurred in 2016 and thus no Transfer of Values are reportable for Sandoz NV-SA for the disclosure cycle 2017.