

## ASSOCIATION OF INTERNATIONAL PHARMACEUTICAL MANUFACTURERS (AIPM) INITIATIVE

### Definitions and Procedure of Information Disclosure of “EVER Neuro Pharma GmbH”

Since 2016, international pharmaceutical companies – members of the Association of International Pharmaceutical Manufacturers (AIPM) have made a commitment to publish information on values transferred to healthcare professionals and healthcare organizations.

The pharmaceutical community considers it its duty to support open and responsible cooperation, demonstrating its commitment to the principles of transparency. This is the key component of ensuring fruitful interaction for the benefit of our patients.

In accordance with the Federal Law No. 323-ФЗ “On the Fundamentals of Citizens’ Health Protection in the Russian Federation” and the Federal Law No. 61-ФЗ “On the Fundamentals of Health Protection”, Healthcare Professionals **have a right to participate** in professional academic events sponsored by companies, to receive compensation for **educational and (or) scholarly activities** performed by the Healthcare Professional, as well as to act under contracts **during clinical studies of medicinal products, clinical studies of medical devices and to receive compensation specified in such contracts.**

“EVER Neuro Pharma GmbH” interacts with Healthcare Professionals (HCP) and Healthcare Organizations (HCO) on a regular basis, including on the following issues: research programs, continuing education of physicians. These interactions are important for HCP to receive up-to-date information necessary to choose therapy to improve patients’ health, and to share information that may be related to making clinical decisions.

The present Report on Disclosure of Information of “EVER Neuro Pharma GmbH” for 2015 reflects direct and indirect Transfers of Value, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of prescription-only medicinal products, over-the-counter products and biologically active supplements for human use only during the period of January 1, 2015 – December 31, 2015.

The general disclosure obligation does not apply to any Transfers of Value that are associated with devices for medical practice, food products and drinks, samples of pharmaceutical products.

### **Definitions**

#### **Healthcare Professionals and Healthcare Organizations**

“EVER Neuro Pharma GmbH” uses definitions of healthcare professionals and organizations suggested in the AIPM Code of Practice (Principal Notions- § 1.2).

**Healthcare Organizations** (as applies to Chapter VII of the AIPM Code) – Any legal person (i) that is a healthcare, medical, pharmaceutical or scientific association or organization (irrespective of the legal or organizational form) such as a hospital, clinic, foundation, university or another institution (except for patient organizations) whose business address, place of registration or other place of operation is in the Russian Federation or (ii) through which one or more Healthcare Professionals provide services.

**Healthcare Professionals** – physicians and other medical professionals, heads of medical organizations, pharmaceutical professionals, including pharmacists and pharmacy technicians, heads of pharmacies and other professionals who, in the course of their professional activities, deal with pharmaceutical products and may prescribe, recommend, purchase, supply or administer pharmaceutical products.

## **Transfers of Value**

In accordance with the AIPM Code of Practice, the following definitions are used in the present Report:

- Direct Transfer of Value, in cash or in kind, is made directly by “EVER Neuro Pharma GmbH» for the benefit of a Healthcare Organization or a Healthcare Professional.

- Indirect Transfer of Value is made on behalf of “EVER Neuro Pharma GmbH” for the benefit of a Recipient, or Transfer of Value is made through an intermediate (e.g., an event agency), in case “EVER Neuro Pharma GmbH” knows or can identify the Healthcare Organization or a Healthcare Professional that will benefit from the Transfer of Value.

**Reporting Period:** the present Report covers all cases of Transfers of Value made during the year two thousand fifteen (2015). In the Financial system, the date of the Transfer of Value is defined as the date of interaction completion.

The categories of Transfers of Value within the Report on Disclosure of Information of “EVER Neuro Pharma GmbH” for 2015 listed below are in compliance with the structure recommended by the AIPM:

- Donations and grants to Healthcare Organizations
- Contribution to costs of Healthcare Professionals/ Healthcare Organizations related to events:
- Sponsorship agreements
- Registration fees
- Travel and accommodation
- Fees for service and consultancy of Healthcare Professionals/ Healthcare Organizations
- Expenses related to contracts under which services and consultancy are provided, including travel and accommodation expenses not stipulated in the contract
- Transfers of Value related to research and development activities.

## **Disclosure of Transfers of Value to Healthcare Professionals (HCP)**

By virtue of the RF legislation prohibiting disclosure of any information related to an individual person without their direct consent, “EVER Neuro Pharma GmbH” has put the most effort to get relevant permissions (consents) of Healthcare Professionals to disclose data on Transfers of Value made for their benefit, on an individual basis.

In case a HCP has given their consent to disclose Transfers of Value, the complete information on such Transfers made during the Reporting Period will be disclosed on an individual HCP named basis.

In case a HCP has not given their consent to disclose Transfers of Value, all Transfers of Value made during the Reporting Period will be disclosed on an aggregate basis.

This means that the disclosed data will not be attributed to a specific HCP, but added to the aggregate sum of value transferred to all HCP that have not given their consent to disclosure for at least one transfer of value during the Reporting Period.

Consent given by a HCP can be withdrawn at any time. In this case, a report is subject to amendments right after the receipt of the notification of consent withdrawal, but no later than 30 (thirty) working days after it.

## **Disclosure of Transfers of Value to Healthcare Organizations (HCO)**

Transfers of Value to HCO are disclosed on an individual basis.

Transfers of Value can be both direct and indirect. Thus, contribution to costs related to events may be made via a third party, a technical assistant (indirect transfer of value to HCO). A contract signed by both parties is a documentary proof of direct Transfer of Value to HCO. A letter from HCO with a request to provide specific support addressed to the company is a proof of indirect Transfer of Value.

In either case, Transfers of Value to HCO are disclosed with consideration of actual circumstances proved by documentation, when the Company knows or can identify the HCO who is the beneficiary, i.e., benefits from such Transfer of Value.

It should be also taken into account that values, including monetary funds, can be transferred or given to third parties (technical assistants) used by HCO to organize events. Values transferred as part of commercial interaction of companies and pharmacies (pharmacy chains), produced as part of usual activities associated with buying and selling of pharmaceutical products and carried out between pharmaceutical companies and Healthcare Professionals or Healthcare Organizations, respectively, values transferred as part of commercial interaction between companies and pharmacies (pharmacy chains), as well as sponsorship fees associated with events organized by the Ministry of Health, its regional and/or affiliate organization that presents a state authority, payments related to state fees and other mandatory payments required by the state **are not subject to disclosure in accordance with the present Procedure.**