

Transfers of Values to Healthcare Professionals, Organizations and Patient Advocacy Groups in Belgium and Luxembourg

Commitment



Collaborative Research Benefits Patients and Society

The collaboration between the pharmaceutical industry and Healthcare Professionals (HCP's), Organizations (HCO's) and Patient Advocacy Groups (together named HCx) has delivered numerous innovative medicines and changed the way many diseases impact our lives. We at Bayer are convinced that close cooperation with HCx and continuous education of HCP's is key to achieving better outcomes for the patients we strive to help.



Pharmaceutical Industry – Healthcare Professionals and Organizations: A Highly Regulated Relationship

When collaborating with medical experts, we comply with existing laws and regulations that clearly outline the interaction between industry and HCx, e.g. healthcare laws and industry codes. Additionally, these rules are amended by different transparency regulations, such as the Sunshine Act in the US, the EFPIA Disclosure Code in Europe, and various local legal reporting obligations like the Sunshine Act in Belgium. We fully respect the independence and integrity of these Healthcare Professionals and Organizations.



Implementing the EFPIA and the Sunshine Act Disclosure Code

As a member of the European Federation of Pharmaceutical Industries and Associations (EFPIA) and in line with the Belgian Sunshine Act and our company values we fully endorse the Disclosure Code. In accordance with the Code, Bayer will disclose payments as well as benefits in kind to Healthcare Professionals, Healthcare Organizations and Patient Advocacy Groups on global and local Bayer websites (Luxembourg) and the external website of [BeTransparent](#) (Belgium).



Disclosure of Data Reports

Find out how we are collecting and disclosing transfers of value to HCx and get access to the national data disclosure.

Click on below links to see the disclosure of our Transfers of Value:

[BeTransparent](#) Belgium

Luxembourg:

[2020](#)

[2021](#)

[2022](#)

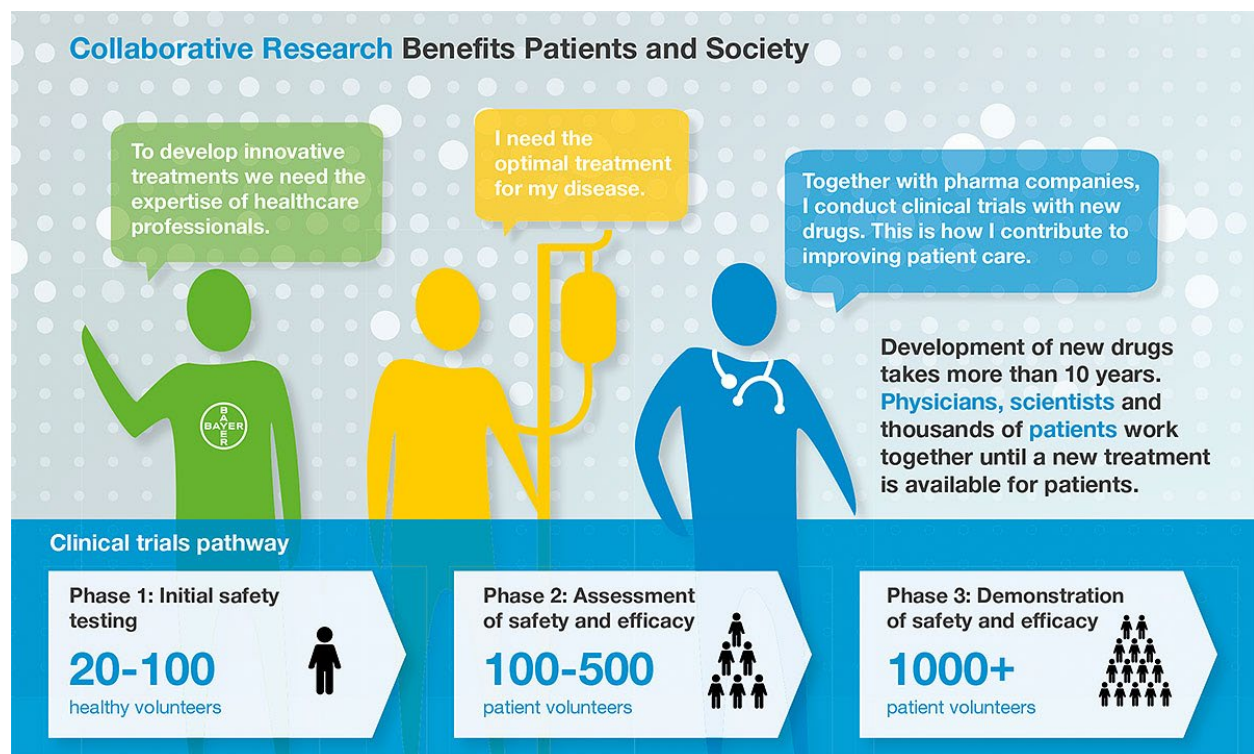
Collaboration with Healthcare Professionals and Organizations

Industry and Healthcare Professionals and Organizations collaborate in a range of activities in preclinical research, clinical development as well as clinical practice and patient outcome.

As the primary point of contact with patients, Healthcare Professionals offer invaluable and expert knowledge on patient outcomes and the management of diseases. This plays a crucial role in optimizing our efforts to improve patient care, treatment options and patient outcomes.

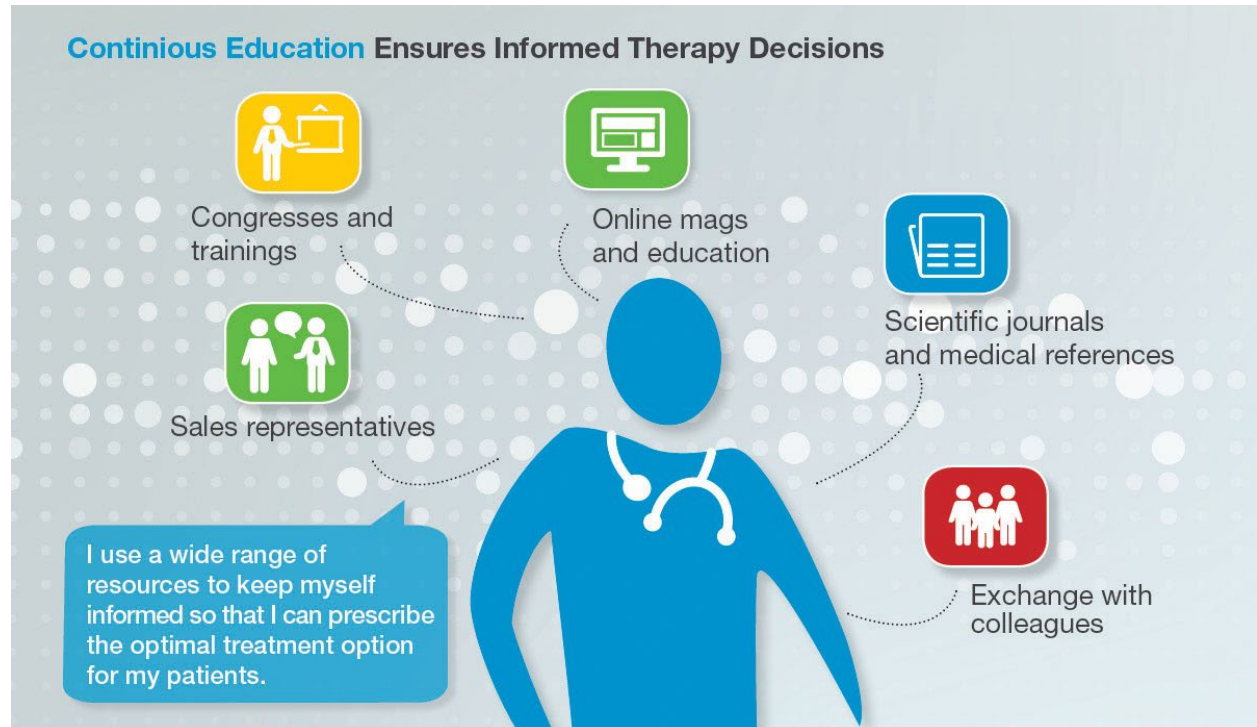
Collaboration example 1: Clinical Trials; Patients Need the Right Medicines

Patients can only truly benefit from the huge amount of invaluable medical knowledge that exists worldwide when our internal experts work closely together with external researchers and Healthcare Professionals. We strongly believe that the joint use of this expertise will help us to gain a better understanding of major diseases and to develop better medicines faster. The treating physician and other Healthcare Professionals conduct clinical trials at study centers in accordance with the clinical study protocol as approved by health authorities, institutional review boards, and ethics committees. Thus, they are the major link to the participating patients and are responsible for collecting data. Expertise and time offered by Healthcare Professionals and Healthcare Organizations in the course of a clinical trial need to be compensated.



Collaboration Example 2: Supporting Physician's Education; Patients Need the Best Informed Doctors

Bayer develops innovative medicines. Novel treatments have to be introduced and explained to Healthcare Professionals to ensure their responsible use. Therefore, we support the education of Healthcare Professionals at congresses and trainings. This contributes to ensuring doctors have access to the latest medical research and are thus able to prescribe the best treatment option for their patients. Only then can we fulfill our commitment to support the correct use of our new treatments. Scientific events are just one of many resources for physician's education.



Facts on Disclosure

What the Disclosure Code is about

Bayer fully supports greater transparency in the relationship between the pharmaceutical industry and Healthcare Professionals, Organizations and Patient Advocacy Groups and therefore ensures compliance with the European EFPIA Disclosure Code and Belgian Sunshine Act.



40 Leading European Companies in 33 Countries are Committed to the EFPIA Disclosure Code

The EFPIA Disclosure Code (full title: EFPIA Disclosure Code of Transfers of Value from Pharmaceutical Companies to Healthcare Professionals and Healthcare Organizations) is a voluntary commitment that requires all EFPIA member companies to disclose transfers of value to Healthcare Professionals and Healthcare Organizations. Under this code, all EFPIA member companies, including Bayer, will publish all direct and indirect, monetary and non-monetary transfers of value related to the development and commercialization of prescription-only human pharmaceuticals. Disclosure of payments (or transfer of value) made in the previous calendar year will be published in July of the current year. This process will be repeated every year.





Level of Compensation

Healthcare Professionals are compensated for their expertise and the services they provide to the pharmaceutical industry. The level of payments and transfers of value depend on the kind of activity, level of expertise, and amount of time. The permissible amounts depend on various factors, e.g. local income level, governing laws and existing codes. The core principle is fair market value remuneration for services received to ensure that honoraria are not misused to unduly influence healthcare Professionals in their treatment decisions.



Individual or Aggregated Disclosure?

Transfers of value to Healthcare Professionals, Organizations and Patient Advocacy Groups will be reported on an individual or an aggregated basis. As the EFPIA Disclosure Code is an industry self-obligation, data privacy laws in most European countries allow individual disclosure only with explicit consent from the healthcare professional. Should a Healthcare Professional not grant his/her consent for individual disclosure, then transfers of value to such a Healthcare Professional will be reported on an aggregated basis (not applicable for Belgium). In some countries, consent must also be obtained from Healthcare Organizations. Transfers of value in the area of 'Research and Development' will always be reported on an aggregated level. In Belgium, disclosure is mandatory by law. Consent is therefor not required.



Data Privacy

Bayer fully respects data privacy and data security. We therefore take multiple steps to protect data in compliance with the data privacy policies required and audited by local and global authorities. Furthermore, data is disclosed only if the affected Healthcare Professional has provided explicit written consent via a contract. High data security mechanisms are in place to ensure data is protected against external attacks and manipulation. In addition, access to any personal disclosure related data is restricted internally to employees responsible for data collection or report preparation.

Data Disclosure

Bayer discloses transfers of value connected to the development and commercialization of prescription-only human pharmaceuticals to Healthcare Professionals, Healthcare Organizations and Patient Advocacy Groups.

The disclosed data include transfers of value in four main categories:

Categories	Transfers of Value	
	Healthcare Professionals	Healthcare Organizations
Donations and Grants		(non) monetary support
Events	1. Registration fees 2. Travel & Accommodation	
Services and Consultancy	1. Fees including related expenses that are covered in connection with the service.	
Research & Development	Support of Clinical Studies, Fees, travel & Accommodation, and other related expenses that are covered in connection with the service.	

We at Bayer Belgium and Luxembourg confirm that our disclosures of transfers of value to Healthcare Professionals, Healthcare Organizations and Patient Advocacy Groups have been reported in application of the key principles of the Belgian Sunshine Act and EFPIA.

Click [here](#) for the Methodology Note of Bayer Belgium and [here](#) for the Methodology Note of Bayer Luxembourg.