

EXPLANATORY NOTE

This Explanatory note has been prepared by ‘Astellas Pharma’ (hereinafter – ‘Astellas’) in accordance with paragraph 7.3.7 of the AIPM Code of Good Practice (hereinafter - the ‘Code’), pursuant to which each pharmaceutical company - member of AIPM undertakes to publish an explanatory note with a brief description of the methodology used for preparation of disclosure and determining the transfer of values for each category, described in paragraphs 7.3.2 and 7.3.3 of the Code.

Transfer of values in favor of healthcare professionals

Processing the information regarding the transfer of values is subject to compliance with the current legislation of the Russian Federation regulating the relations on the processing of personal data, according to which the processing of personal data is carried out with the consent of the subject of personal data processing, provided that the consent may be withdrawn by the subject of personal data.

Information on each fact of transfer of values is disclosed on an individual basis, subject to compliance with current legislation on personal data protection.

In particular, information regarding transfer of values in favor of healthcare professionals, direct or indirect, is disclosed on an individual basis by identifying each individual recipient of values, which were received during the reporting period, in accordance with the informed consent in accordance with the requirements of current Russian legislation.

In case when transfer of values in favor of healthcare professionals was made without an informed consent to the individual disclosure, information on such transfer of values should be disclosed in the reporting period on general terms. Such general disclosure of information displays each category of payments relating to (i) the number of recipients covered by such disclosure, in absolute terms and as a percentage of the total number of recipients, and (ii) the total amount in respect of transfer of values to such recipients.

Fees for services and consulting, paid in favor of healthcare professionals, include personal income tax. All amounts of remuneration specified in the contracts with healthcare professionals in Russian rubles (RUB), should be paid and disclosed in rubles.

Transfer of values in favor of healthcare organizations

Information on the transfer of values in favor of healthcare organization is carried out on an individual basis if the relevant information is not a trade secret of healthcare organization and if the appropriate healthcare organization did not prohibit the disclosure of information in its contract with Astellas.

The amounts of values transferred in favor of healthcare organizations do not include VAT. The amounts of values transferred under the contracts with healthcare organizations, are specified and paid in Russian rubles (RUB), and should be disclosed in rubles.

Payments in connection with the research and development for each reporting period are disclosed on the general terms.

Conflict of interest

Astellas reaffirms its commitment to the principle that collaboration between healthcare professionals and pharmaceutical companies should not result in a conflict of interest for healthcare professionals, in particular between their professional obligations and personal interest.