

**CELGENE INTERNATIONAL HOLDINGS  
CORPORATION  
BRANCH OFFICE SLOVENIA**

**Methodological Statement**

*summarizing the methodologies used in preparing the disclosure of transfers of value to health professionals and healthcare organisations pursuant to Clause 3.5 of the Code on Disclosure of Transfers of Value from Pharmaceutical Companies to Healthcare Professionals and Healthcare Organisations, the “Code”*

**Introduction**

Celgene International Holdings Corporation, Branch Office Slovenia (“**Celgene**”) is responsible for the sales support and marketing of medicinal products in Slovenia.

Celgene also collaborates both directly and through its parent company, Celgene Corporation<sup>1</sup>, in pre-clinical research and clinical trials in Slovenia.

In the course of these activities, Celgene engages with health professionals whose registered practice addresses are in Slovenia and with healthcare organisations based in Slovenia.

The disclosures that Celgene has published on its website represent the transfers of value that Celgene has made to such health professionals and healthcare organisations during the course of 2017 insofar as those transfers of value fall within Celgene’s disclosure obligations as defined in the Code.

**Methodology**

The data upon which Celgene’s disclosures are based has

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**Pojasnilo o metodologiji**

*ki povzema uporabljeno metodologijo pri pripravi razkritja prenosov vrednosti zdravstvenim delavcem in zdravstvenim organizacijam v skladu s členom 3.5 Kodeksa o javni objavi prenosov sredstev zdravstvenim delavcem in zdravstvenim organizacijam s strani farmacevtskih družb, (“Kodeks”)*

**Uvodno**

Celgene International Holdings Corporation, Podružnica v Sloveniji (“**Celgene**”) se ukvarja s podporo prodaje in trženjem zdravil v Sloveniji.

Celgene prav tako sodeluje, tako neposredno kot preko svoje matične družbe Celgene Corporation<sup>2</sup>, v predkliničnih raziskavah in kliničnih preskušanjih v Sloveniji.

V okviru teh dejavnosti Celgene sodeluje z zdravstvenimi delavci, ki primarno poklicno dejavnost opravljajo v Sloveniji in z zdravstvenimi organizacijami s sedežem v Sloveniji.

Razkritja, ki jih Celgene objavil na svoji spletni strani, predstavljajo prenose vrednosti, ki je Celgene prenesel tem zdravstvenim delavcem in zdravstvenim organizacijam v letu 2017, kolikor ti prenosi vrednosti sodijo med podatke, ki jih mora podjetje Celgene razkriti, v skladu s Kodeksom.

**Metodologija**

Podatke, na katerih temeljijo razkritje podjetja Celgene, je

<sup>1</sup> For the purposes of this document alone, the term “Celgene Corporation” refers to Celgene Corporation and all of its affiliates, sub-contractors and agents worldwide.

<sup>2</sup> Samo za namen tega dokumenta se pojem “Celgene Corporation” nanaša na Celgene Corporation in vse njene povezane družbe, podizvajalce in zastopnike po celem svetu.

been collected and compiled by Celgene Corporation's Spend Transparency Office based in Summit, New Jersey. The Spend Transparency Office is responsible for the disclosure of transfers of value to health professionals and healthcare organisations made by any Celgene Corporation affiliate worldwide in accordance with relevant local laws and codes of practice.

In order to prepare for compliance with the Code, the Spend Transparency Office first identified all of the possible sources of information within the Celgene Corporation finance system and held by third party vendors that could identify any and all payments made by Celgene. Using information supplied by IMS Health, verified and supplemented by various commercial operations resources within Celgene and Celgene Corporation, publically available information and information from third party vendors, the Spend Transparency Office narrowed down the list of payees to those that fell within the definitions of health professional, other relevant decision makers and healthcare organisation, as set out in the Code. Celgene used the IMS OneKey Code as a unique identifier of any given health professional.

On the basis of these data Celgene has used its best endeavours to disclose the data by publication thereof on Celgene's website. Pursuant to Code, adopted by Forum of International Research and Development Pharmaceutical Companies, EIG ("Forum") published information include all direct and indirect transfers of value made between 1 January 2017 and 31 December 2017 inclusive that fall within its disclosure obligations as set out in the Code, applying the relevant definitions contained therein. Celgene undertakes to promptly make any corrections or additions that may be required as a result of knowledge acquired after the date the disclosures are submitted.

### ***Third parties***

Celgene has included in its contractual templates, on the basis of which it contracts with all third parties, a binding clause requiring the third party to notify to Celgene all transfers of value made to health professionals and healthcare organisations. Celgene has used its best

zbrala Služba za preglednost poslovanja Celgene Corporation (*Spend Transparency Office*) s sedežem v Summitu, New Jersey. Ta služba je odgovorna za razkritje prenosov vrednosti zdravstvenim delavcem in zdravstvenim organizacijam, ki jih opravijo podružnice in odvisne družbe Celgene Corporation podružnice po vsem svetu, v skladu z veljavnimi lokalnimi zakoni in pravilniki.

Z namenom priprave podatkov v skladu s Kodeksom je Služba za preglednosti poslovanja najprej identificirala vse možne vire podatkov v finančnem sistemu Celgene Corporation in pri tretjih dobaviteljih, ki lahko identificirajo vsa plačila, ki jih opravi Celgene. Z uporabo informacij, ki jih dobavlja IMS Health, s preverjanjem in dopolnjevanjem pri različnih virih komercialnih informacij v Celgene in Celgene Corporation, z javno dostopnimi podatki in podatki tretjih dobaviteljev je Služba za preglednosti poslovanja zožila seznam prejemnikov plačil na tiste, ki zapadejo pod pojem zdravstvenih delavcev, drugih zadevnih odločevalcev in zdravstvenih organizacij, kot je to določeno v Kodeksu. Celgene kot edinstven identifikator posameznega zdravstvenega delavca uporablja šifro IMS OneKey.

Na podlagi teh podatkov je Celgene je po svojih najboljših močeh razkril podatke z objavo na spletni strani podjetja Celgene. V skladu s Kodeksom, ki ga je sprejel Mednarodni forum znanstvenoraziskovalnih farmacevtskih družb, GIZ ("Forum"), so objavljeni vsi neposredni in posredni prenosi vrednosti, opravljeni med 1. januarjem 2017 in vključno 31. decembrom 2017, ki spadajo v okvir obveznega razkritja, kot je določeno v Kodeksu in definicijah, vsebovanih v njem. Celgene se obvezuje, da bo nemudoma popravil ali dopolnil, če bi se objavljeni podatki po datumu razkritja izkazali na nepravilne ali nepopolne.

### ***Tretje osebe***

Celgene je v svoje vzorce pogodb, ki jih uporablja pri poslovanju s tretjimi osebami, vključil zavezujočo klavzulo, ki od tretje osebe zahteva, da Celgene obvesti o vseh prenosih vrednosti, ki jih opravi zdravstvenim delavcem in zdravstvenim organizacijam. Celgene je po svojih

endeavours to include all such transfers of value so notified within the scope of its disclosure.

#### ***Distributors***

Celgene does not market its products through distributors in Slovenia.

#### ***Cross border transactions***

Celgene Spend Transparency Office has worked with all of Celgene's functions and affiliates worldwide to capture data relating to transfers of value made by them to health professionals with their practice address in Slovenia and healthcare organisations based in Slovenia. Celgene has used its best endeavours to include all such transfers of value so notified within the scope of its disclosure.

#### ***Consent***

Celgene has used its best endeavours to seek consent from all health professionals to disclosure on an individual basis, naming the recipient and identifying the value of the transfer. To this end, Celgene has incorporated a binding clause to this effect in its contractual templates on the basis of which, pursuant to Celgene's relevant policies, all such engagements should proceed.

In the event that a health professional has declined to give their consent to such individual disclosure, the Country Manager of Celgene, or his designee, has considered in each case whether there is an overriding need to pursue the potential engagement with the result that any transfer of value may only be disclosed in aggregate pursuant to the Code. Factors that are relevant to this consideration include whether the health professional has special knowledge and skills that are not available to Celgene from another health professional willing to give consent to individual disclosure.

In circumstances where a health professional declines to give, or subsequently withdraws, consent to one or more transfers of value in the course of the 2017 reporting year, Celgene has disclosed all transfers of value made to that

najboljših močeh v razkrite podatke vključil tudi vse takšne prenose vrednosti.

#### ***Distributerji***

Celgene v Sloveniji svojih izdelkov ne trži preko distributerjev.

#### ***Čezmejne transakcije***

Celgenova Služba za preglednost poslovanja je sodelovala z vsemi odvisnimi družbami in podružnicami po celem svetu, da je zajela vse podatke, ki se nanašajo na prenose vrednosti, ki so jih zdravstvenim delavcem, ki svojo primarno poklicno dejavnost opravljajo v Sloveniji, in zdravstvenim organizacijam s sedežem v Sloveniji, izplačale te odvisne družbe in podružnice. Celgene je po svojih najboljših močeh v razkrite podatke vključil tudi vse takšne prenose vrednosti.

#### ***Soglasje***

Celgene je po svojih najboljših močeh skušal pridobiti soglasje od vseh zdravstvenih delavcev za razkritje na individualni osnovi s poimenovanjem prejemnika in navedbo vrednosti prenosa. V ta namen je Celgene v vzorce svojih pogodb, ki je v skladu s svojimi politikami Celgene dolžan uporabljati, vključil zavezujočo klavzulo.

V primeru, da je zdravstveni delavec odklonil soglasje za individualno razkritje, je direktor Celgene ali njegov pooblaščenec v vsakem primeru posebej preveril, ali obstaja nujna potreba po sodelovanju s takšno osebo, ki bo imela za posledico razkritje prenosa vrednosti le v agregirani obliki skladno s Kodeksom. Dejavniki, ki so bili pomembni za takšno odločitev, so bila posebna znanja in veščine zdravstvenega delavca, ki jih Celgene ne bi mogel dobiti od drugega zdravstvenega delavca, ki bi bil soglasje za individualno razkritje sicer pripravljen podati.

V primerih, ko je zdravstveni delavec odklonil soglasje ali je soglasje naknadno umaknil za enega ali več prenosov vrednosti v letu 2017, je Celgene vse prenose vrednosti temu zdravstvenemu delavcu razkril v agregirani obliki.

health professional in aggregate.

### ***Disclosure in aggregate***

Where the recipients of transfers of value cannot be disclosed for legal reasons, including where a health professional has declined to give consent to disclosure on an individual basis, Celgene has disclosed those transfers of value on an aggregate basis.

Celgene has also disclosed on an aggregate basis transfers of value falling within the definition of "Research and Development Transfers of Value" pursuant to the Code.

### ***Currency***

Celgene has made its disclosures in EUR, using a published monthly average exchange rate for payments made in any other currency.

### ***Tax***

Celgene has made its disclosures relating to direct transfers of value exclusive of all applicable taxes. It is possible, however, that some indirect transfers of value made by third party vendors have been reported to us inclusive of taxes.

### ***Date methodology***

Celgene has made its disclosures relating to cash payments by reference to the payment date. In circumstances where transfers of value represent benefits in kind Celgene has made its disclosures by reference to the date of the event.

### ***Multi-year contracts***

Celgene has not identified any multi-year contracts that fall within its disclosure obligations for 2017.

Prepared by

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### ***Razkritje v agregirani obliki***

Kjer iz zakonskih razlogov prejemniki prenosov vrednosti niso mogli biti razkriti, vključno s primeri, kjer zdravstveni delavci niso podali soglasja za objavo podatkov na individualni ravni, je podjetje Celgene prenose vrednosti razkrilo v agregirani obliki.

Celgene je prav tako v agregirani obliki razkril prenose vrednosti, ki skladno s Kodeksom zapadejo pod pojem "Prenosi vrednosti na področju raziskav in razvoja".

### ***Valuta***

Celgene je prenose vrednosti objavil v EUR, pri čemer je uporabil objavljene mesečne povprečne menjalne tečaje za pretvorbo zneskov plačil v tujih valutah.

### ***Davki***

Celgene je razkril podatke, ki se nanašajo na neposredne prenose vrednosti brez vseh veljavnih davkov. Vseeno je pa možno, da so bili nekateri posredni prenosi vrednosti, ki jih tretji dobavitelj poročajo podjetju Celgene, razkriti skupaj z davki.

### ***Časovna metodologija***

Celgene je prenose vrednosti v zvezi z gotovinskimi plačili razkril glede na datum plačila. V primerih, kjer je prenos vrednosti predstavljala korist v naravi, je podjetje Celgene prenose vrednosti razkrilo glede na datum dogodka.

### ***Večletne pogodbe***

Celgene ni identificiral večletnih pogodb, ki bi sodile po obveznost razkritja za leto 2017.

Pripravila:

Celgene International Holdings Corporation, Podružnica v  
Sloveniji  
Celgene Corporation, Spend Transparency Office, Summit,  
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