

Data disclosure form												
	Full name	HCPs: City of Principal Practice HCOs: city where registered	Country of Principal Practice	Principal Practice Address	Unique country identifier OPTIONAL	Donations and Grants to HCOs	Contribution to costs of Events			Fee for service and consultancy		TOTAL (OPTIONAL)
							Sponsorship agreements with HCOs / third parties appointed by HCOs to manage an Event	Registration Fees	Travel & Accommodation	Fees	Related expenses agreed in the fee for service or consultancy contract, including travel & accommodation relevant to the contract	
HSP-s	INDIVIDUAL NAMED DISCLOSURE - one line per HCP (i.e. all transfers of value during a year for an individual HCP will be summed up: itemization should be available for the individual Recipient or public authorities' consultation only, as appropriate)											
						N/A	N/A					
						N/A	N/A					
						N/A	N/A					
	OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons											
	Aggregate amount attributable to transfers of value to such Recipients					N/A	N/A	0	747.97 EUR	0	0	Optional
	Number of Recipients in aggregate disclosure					N/A	N/A	0	2	0	0	Optional
	% of the number of Recipients included in the aggregate disclosure in the total number of Recipients disclosed					N/A	N/A	%	100%	%	%	N/A
HCO-s	INDIVIDUAL NAMED DISCLOSURE - one line per HCO (i.e. all transfers of value during a year for an individual HCO will be summed up: itemization should be available for the individual Recipient or public authorities' consultation only, as appropriate)											
												Optional
												Optional
												Optional
	OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons											
	Aggregate amount attributable to transfers of value to such Recipients											Optional
	Number of Recipients in aggregate disclosure											Optional
	% of the number of Recipients included in the aggregate disclosure in the total number of Recipients disclosed					%	%	%	%	%	%	N/A
R&D	AGGREGATE DISCLOSURE											
	Transfers of Value re Research & Development as defined										Total amount	Optional

English language version below

Metoodilised märkused

Tillotts Pharma poolt Eesti tervishoiutöötajatele ja -asutustele 2023. aastal tehtud maksete avalikustamine

Eesti Ravimitootjate Liidu retseptiravimite ja tervishoiuspetsialistidega koostöö edendamise koodeksi („koodeks“) kohaselt on kohustuslik avalikustada 2024. aastal teatavad 2023. aastal Eesti tervishoiuspetsialistidele, tervishoiuorganisatsioonidele ja kolmandatele isikutele nende kasuks tehtud väärtusülekanded. Kui konkreetne tervishoiuspetsialist ei ole talle makstud tasude avaldamist lubanud, avaldatakse talle makstud tasud koondsummas. Avalikustatavad andmed avaldatakse Tillotts Pharma veebisaidil www.tillotts.com. Nõuded avalikustamisele on esitatud koodeksi lisa C1 artiklis 22.

Alltoodud metoodilistes märkustes selgitatakse lugejale lähemalt, milliseid andmeid Tillotts Pharma on avalikustanud ja kuidas need andmed on koostatud. Nende metoodikaalaste märkuste lisamine avaldatavatele andmetele on koodeksi kohaselt samuti kohustuslik.

Käibemaks

Kõik makstud tasud avaldatakse käibemaksuta.

Valuuta

Kõik andmed avaldatakse eurodes. Kui algne makse tehti muus valuutas, konverteeritakse summa eurodesse algse makse ajal kehtinud kursi alusel.

Kontserni koondandmete ja välisriikidesse tehtud maksete avaldamine

Avaldatud andmed on kontserni Tillotts Pharma maksete koondandmed EFPIA avalikustamisjuhendi kohaselt, mis nõuab rahvusvaheliste ettevõtete eraldi üksuste (nt ema- ja tütarettevõtete) käsitamist ühe äriühinguna. Kõik 2023. aastal avaldatud maksed on teinud Tillotts Pharma AG.

Andmekaitse

Andmete avaldamise nõusolek

Riikides, kus seda kohaldatavate andmekaitseseadustega nõutakse, on Tillotts teinud mõistlikkuse piires kõik võimaliku, et hankida nõusolek tervishoiutöötajatelt ja tervishoiuorganisatsioonidelt (kui on kohaldatav), et avalikustada maksed ja muud väärtuste ülekanded. Vastavalt EFPIA suunistele pole osaline nõusolek võimalik. Kui nõusolekut ei anta, esitatakse andmeid ainult koondandmete tasandil.

Nõusoleku hankimine ja tagasivõtmine

Tillotts austab kohaldatavaid andmekaitseseadusi. Kui sidusrühm võtab varem antud nõusoleku tagasi, kohandab Tillotts publikatsiooni mõistliku aja jooksul.

Sisalduvad andmed

Tillotts Pharma avaldatud andmed on kooskõlas koodeksiga. Andmed võib liigitada järgmiselt:

Sponsorlus tervishoiuspetsialistide osalemisele teavitusüritustel

Avaldatud andmed hõlmavad osalemist eelmisel kalendriaastal tervishoiuspetsialistidele kaudselt tasutud üritustega seotud kulude, nt registreerimistasude ja lähetuskulude rahastamisel.

Methodological Notes

Disclosure by Tillotts Pharma of payments to Estonian healthcare professionals and healthcare organisations in 2023

The Code of the Association of Pharmaceutical Manufacturers in Estonia on the Promotion of Prescription Medicines and Cooperation with Healthcare Professionals (the "Code") mandates the public disclosure in 2024 of certain transfers of value made during 2023 to Estonian healthcare professionals, healthcare organisations and to third parties in their benefit. Where permission to disclose transfers of value has not been granted by individual healthcare professionals, the transfer of value made to them is disclosed in an aggregated fashion. The disclosure data will be published on the website of Tillotts Pharma, www.tillotts.com. The disclosure requirements are set forth in Article 22 and Annex C1 of the Code.

The methodological notes below explain the data Tillotts Pharma have disclosed and how the data have been prepared, to assist the reader's understanding. Inclusion of these methodological notes alongside the disclosure data is also mandated by the Code.

VAT

VAT is excluded from all disclosures of transfer of value.

Currency

All disclosures are made in Euros (€). Where the original payment was made in another currency, the sum was converted to Euros at the exchange rate prevailing at the time of the original payment.

Consolidated Disclosures of the Corporate Group and Cross-border Payments

The disclosures represent the consolidated transfers of value made by the Tillotts Pharma corporate group in line with the EFPIA Disclosure Code's dictate that separate entities belonging to the same multinational company (which could

be the parent company and subsidiary company) shall be deemed to constitute a single company. In 2023, the disclosures represent payments that were all made by Tillotts Pharma AG.

Data Protection

Consent to disclose data

In countries where it is required by applicable data protection laws, Tillotts has taken all reasonable steps to obtain consents from the HCPs, and HCOs, as applicable, to publicly disclose payments and other transfers of value. In accordance with EFPIA guidance, partial consents are not acceptable. If consent is not provided, the data will be reported on an aggregate level only.

Consent collection and withdrawal

Tillotts respects applicable data protection laws. If a stakeholder withdraws the provided consent, Tillotts will adjust the publication accordingly within a reasonable time.

Data included

The data disclosed by Tillotts Pharma is consistent with the requirements of the Code. The data can be categorised as follows:

Sponsorship of healthcare professionals to attend educational events

Disclosed data includes the contribution to event-related costs such as registration fees and travel costs paid indirectly to health care professionals in the previous calendar year.