



Europe

Teva Pharmaceuticals Europe B.V.

EFPIA Disclosure Code

Self-certification for the calendar year 2017

Teva Pharmaceuticals Europe BV

Background

As owners of scientific knowledge and as experts in medicinal products, pharmaceutical companies can be unique resources to healthcare systems and providers, including to healthcare professionals (HCPs) and healthcare organizations (HCOs). In turn, HCPs and HCOs provide pharmaceutical companies and the pharmaceutical industry as a whole with valuable, independent and expert knowledge derived from their clinical and professional experiences. This collaborative dynamic ultimately benefits patients.

Throughout the life cycle of medicinal products, pharmaceutical companies interact with HCPs and HCOs. These interactions are essential in addressing patient needs. Pharmaceutical companies interact with HCPs and HCOs on a range of activities, from clinical research and sharing best clinical practice to exchanging information on how new medicines fit into the patient pathway. Like most pharmaceutical companies, Teva Pharmaceuticals Europe BV, through country affiliates, interacts with HCPs and HCOs.

Transparency and Teva Pharmaceuticals Europe BV

Teva Pharmaceuticals Europe BV has a long association with self-regulatory organizations in the pharmaceutical industry. Teva Pharmaceuticals Europe BV was a founding member and continues to be a leading member of Medicines for Europe (originally known as the European Generics Medicines Association), which is now the self-regulatory organization for generics, biosimilars, and value-added medicines. In late 2016, Teva Pharmaceuticals Europe BV also became a member of EFPIA at a regional level, although some Teva Pharmaceuticals Europe BV country-level affiliates had previously joined country-level EFPIA associations.

Both EFPIA and Medicines for Europe have codes of conduct as well as rules for disclosing support to HCPs and HCOs. Teva Pharmaceuticals Europe BV has both innovative and generic businesses subject to the respective disclosure frameworks. Some of Teva Pharmaceuticals Europe BV's country-level affiliates had already disclosed support under EFPIA rules in 2017 for calendar year 2016 data. In 2018, EFPIA issued guidelines that all companies having both innovative and generics businesses must disclose under EFPIA disclosure rules.

Teva Pharmaceuticals Europe B.V.

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Transparency framework

EFPIA and its member associations have adopted codes and guidelines to ensure that the interactions of their member companies with HCPs and HCOs meet high standards of integrity and transparency. A similar code and guidelines exist for Medicines for Europe.

Both self-regulatory bodies aspire to greater transparency about interactions between pharmaceutical companies on the one hand and HCPs and HCOs on the other hand. This transparency serves in part to increase understanding of these interactions and recognition of their value to patient care. Transparency related to these interactions includes disclosure of Transfers of Value (ToVs) to HCPs and HCOs. Teva Pharmaceuticals Europe BV, through its country-level affiliates, discloses data under the EFPIA transparency framework (Disclosure Code and guidelines).

Scope

Teva Pharmaceuticals Europe BV certifies that its disclosures of ToVs

- have been completed in each EFPIA country where Teva Pharmaceuticals Europe BV operates,
- include direct and indirect ToVs as defined in the codes and associated guidance issued by EFPIA, and
- are further described in the respective country's Methodological Note.

Methodology

Teva Pharmaceuticals Europe BV certifies that:

- disclosure complies with relevant data protection obligations,
- data collection complies with the requirements of the EFPIA transparency framework (Disclosure Code and guidelines) with limitation on cross-border data,
- actions were taken to ensure individual disclosure for ToVs to HCPs and HCOs,
- aggregate disclosures are limited to Research and Development ToVs as well as ToVs that cannot be disclosed on an individual basis for legal and/or data protection reasons, and
- if an HCP or HCO has provided consent to individual disclosure only in respect of part of the ToVs the HCP or HCO has received, all ToVs to such HCP or HCO are disclosed in the aggregate.

July 2, 2018

Amsterdam, The Netherlands

Richard Daniell

Executive Vice President

Teva Pharmaceuticals Europe BV

Signature: _____



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