



Transparency Roundtable

Company Perspective | May 13th, 2015

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Global Transparency and Disclosure

Experiences from a company perspective (Grünenthal)

1. Global Transparency Approach

2. Internal and External Communication

3. Key Learnings

Global Transparency Approach

Interesting journey to reach full transparency

- To create **full internal transparency** on all interactions with HCP/HCO and other external partner
- To meet **external reporting requirements** in US and Europe

Global Transparency Initiative led by Compliance

2011

2012

2013/14

2014/15

2016

Goal to improve centralized oversight on all HC Interactions

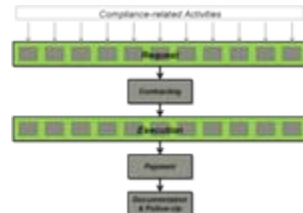
Inventory Taking & Structuring

Processes & Standards

Tools and Systems (Europe and US)

Data Monitoring & Consent Solution

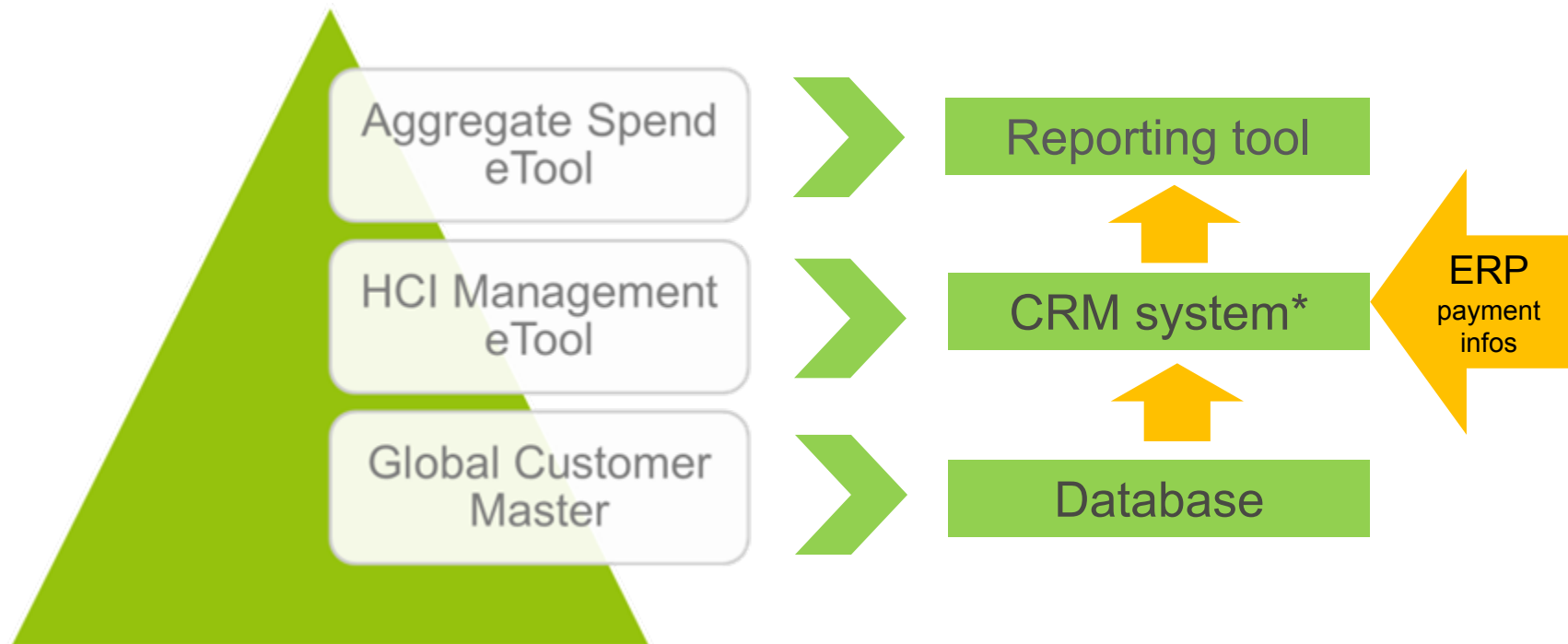
EFPIA closure of ToV



Activity	Activity ID	Activity Name	Activity Description	Activity Status	Activity Owner	Activity Start Date	Activity End Date	Activity Completion Date	Activity Completion Status	Activity Completion Date	Activity Completion Status
Inventory Taking & Structuring	1	Inventory Taking & Structuring	Inventory Taking & Structuring	Completed	Compliance	2011-01-01	2011-12-31	2011-12-31	Completed	2011-12-31	Completed
Processes & Standards	2	Processes & Standards	Processes & Standards	Completed	Compliance	2012-01-01	2012-12-31	2012-12-31	Completed	2012-12-31	Completed
Tools and Systems (Europe and US)	3	Tools and Systems (Europe and US)	Tools and Systems (Europe and US)	Completed	Compliance	2013-01-01	2013-12-31	2013-12-31	Completed	2013-12-31	Completed
Data Monitoring & Consent Solution	4	Data Monitoring & Consent Solution	Data Monitoring & Consent Solution	Completed	Compliance	2014-01-01	2014-12-31	2014-12-31	Completed	2014-12-31	Completed
EFPIA closure of ToV	5	EFPIA closure of ToV	EFPIA closure of ToV	Completed	Compliance	2016-01-01	2016-12-31	2016-12-31	Completed	2016-12-31	Completed

Global Transparency Approach

Smart selection and deployment of embedded business tools



* All required information is collected in the CRM system (except trial related information)

Global Transparency Approach

Key focus activities to secure success

1 Awareness

- Top management support needed
- Involvement of all departments
- Information of external partners (e.g. CROs)

2 Training

- Correct understanding of processes
- Definition of roles & responsibilities
- Training on systems
- Training of external partners

3 Monitoring

- Correct use of processes and tools
- Completeness of collected data
- Plausibility checks
- Accuracy of consent for disclosure information

4 Reporting

- Complete and accurate recipient information
- Differentiation between values for individual vs. aggregate disclosure
- Correct allocation of costs by category

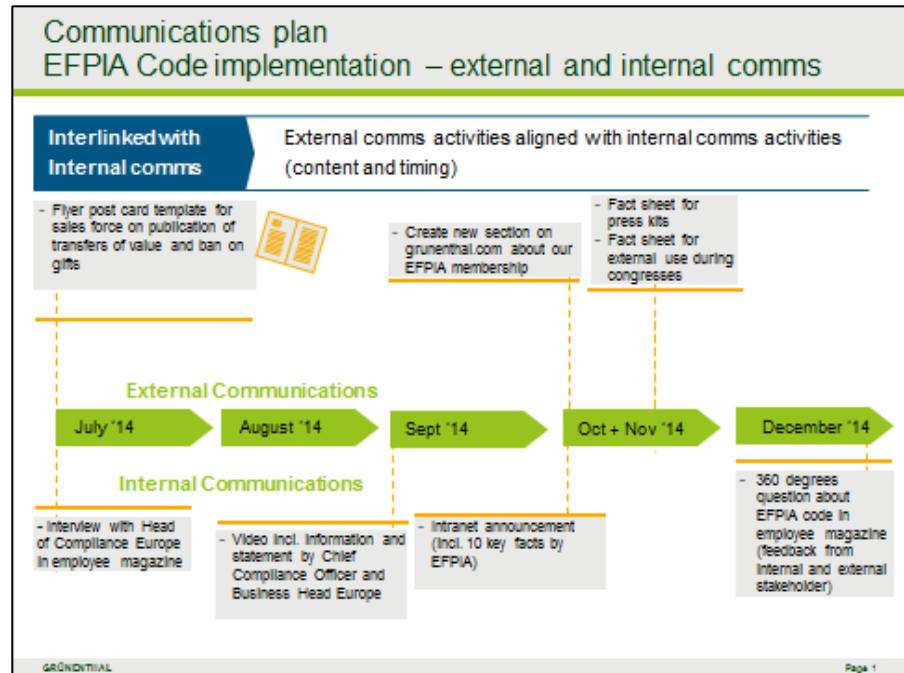
Internal and External Communication

To obtain Acceptance

- In many company, town hall and departmental meetings to reach all employees
- Via newsletter, intranet and company magazine
- By using a video with the Chief Compliance Officer and the Head of the European Business Unit
- And by using materials for external communication (e.g. flyer)

To ensure complete and accurate reporting in 2016;

While obtaining high number of consents to allow a good level of individual data disclosure.




Internal and External Communication

To obtain Acceptance

Internal and external stakeholder have been asked for their opinion*

360 degree question:



In 2015, the new European Federation of Pharmaceutical Industries and Associations (EFPIA) transparency code will become effective. Grünenthal as a member of (EFPIA) is making the commitment to publish payments and other transfers of value to healthcare professionals (HCPs) and healthcare organizations (HCOs). This will have a significant impact on the collaboration with our external partners. Therefore we asked you for your feedback on the question:

What does the new
efpia
transparency code
mean for you?

"WHEN ANYONE BECOMES ill, they take comfort in the knowledge that the healthcare professionals who are looking after their needs at every level are trustworthy, honest and are always keeping their best interests first and foremost in their mind. The new EFPIA transparency code is hugely important in that it gives patients and healthcare professionals at every level, comfort in the knowledge that from here on in, everything will be open, honest and transparent. I am pleased that lessons have been learned from the mistakes of the past and I am convinced that it is in everyone's interest that these codes are fully and properly adopted."

, Patient Ambassador

* Published in the employee magazine in February 2015

Key Learnings

After First Years of Implementation

**Global approach needed
with some flexibility for
local adaptations**

**Top Level commitment needed
to ensure the “buy-in”
from the entire organization**

efpia
DISCLOSURE
CODE

**Regular systematic
monitoring is needed to
ensure accuracy of data to
be published**

**High value of “Internal
transparency” not only for
Compliance but also to
provide better business
oversight**

