



Stakeholder Payment Reporting for Suppliers

Stakeholders are people or organizations with a special role in delivering, or affecting the delivery of, healthcare, including healthcare professionals (“HCPs”), hospitals and other healthcare organizations (“HCOs”), patients and patient organizations.

Roche Canada, as a member of the Roche Group of companies operating globally, adheres to a multitude of global, regional and local rules and regulations and best industry practices and standards relating to tracking and reporting payments and other transfers of value to Stakeholders, including the Innovative Medicines Canada Voluntary Guidelines on Transfer of Value Reporting, the U.S. *Sunshine Act*, and the European EFPIA Disclosure Code.

Accordingly, where a Roche Supplier is working on a project that involved or requires the services of a Stakeholder, the following rules apply:

1. Except in the case of market research activities, clinical trial activities, medical education activities or where other **explicitly** required for the services and agree to in advance by Roche, Suppliers **should not** engage or make any payments to Stakeholders on behalf Roche. If a project requires the services of a Stakeholder, Provider will contact Roche and arrange for Roche to retain and pay the Stakeholder directly.
2. Where Roche has **explicitly agreed** that the services **require** the Supplier to engage and make indirect payments to HCPs, HCOs, patients or patient organizations on behalf of Roche, the following provisions apply:
 - a. Any engagement of a Stakeholder must be made pursuant to a written agreement or other document **in a form approved by Roche**, executed prior to commencement of the services. Provider will promptly deliver to Roche all such signed agreements.
 - b. All fees payable to Stakeholders shall be the fair market value for the services and no payments shall be provided for the purpose of inducing Stakeholder (including anyone in or under Stakeholder’s employ, direction or control) to purchase, recommend or prescribe any drugs, devices or products.
 - c. All fees shall be paid directly to the Stakeholder who has rendered the services (and not any third party in lieu of the contracted party).
 - d. All fees shall be paid to the Stakeholder only after the services are rendered by the Stakeholder.
 - e. If the project requires travel, all travel and accommodations for the Stakeholder must be arranged directly by Roche via Roche’s dedicated travel agency. Any exceptions to this requirement must be approved in writing by Roche.
3. **Reporting:** Within thirty (30) days of making any payment to a Stakeholder or upon Roche’s demand, Provider will submit information relating to Stakeholder payments in a form provided by Roche (and available on the Roche Vendor Portal), which will require the disclosure of the following information:
 - a. In the case of an HCP, the jurisdiction (province or state) in which the HCP is licensed and whether or not the physician is licensed to practice medicine in the United States;
 - b. The name and business address of the HCP, HCO, patient or patient organization;



- c. The amount of the payment or other transfer of value;
 - d. The date on which the payment or transfer of value was made;
 - e. A description of the form of the payment or other transfer of value (i.e., cash or cash equivalent; in-kind items or services);
 - f. A description of the nature of the payment or transfer of value (i.e., consulting fees, compensation for non-consulting services, grant, education, research, food, travel, or royalty); and
 - g. If applicable, the name of the specific Roche product to which the payment relates.
4. Provider will also ensure that any payee is made aware that the above information will be collected by Roche and may be used and disclosed by Roche and its Affiliates in order to comply with global, regional and local rules, regulation and best industry practices and standards relating to transparency.

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