

**Reporting of Transfers of Value to HCPs and HCOs  
Methodological Note for Reporting of 2016 Data in 2017**



## Contents

1. Introduction.....	4
Approach to disclosure at AZ .....	4
2. Definitions.....	5
2.1. Recipients .....	5
2.1.1. Definition of an HCP .....	5
2.1.2. Definition of an HCO.....	5
2.2. Kind of ToVs .....	5
2.2.1. Donations and Grants.....	6
2.2.2. Sponsorship agreements.....	6
2.2.3. Registration fees.....	6
2.2.4. Travel and Accommodation.....	7
2.2.5. Fees for service and consultancy and related expenses.....	7
2.2.6. Research and Development .....	8
3. Scope of disclosure .....	8
3.1. Products concerned.....	8
3.2. Excluded ToVs.....	8
3.2.1. Hospitality costs.....	8
3.2.2. Informational and Educational Materials and Items of Medical Utility... 8	
3.2.3. Logistical costs .....	9
3.2.4. Donations to charitable organisations & Patient Organisations.....	9
3.3. Date of ToVs.....	9
3.4. Direct ToVs .....	9
3.5. Indirect ToVs.....	9
3.5.1. Indirect ToVs through CROs .....	9
3.5.2. Indirect ToVs through other third parties .....	10
3.5.3. Indirect ToVs through HCOs .....	10
3.6. ToVs in case of partial attendances or cancellation .....	10
3.7. Cross-border activities .....	10
3.7.1. Cross-border activities.....	10
4. Specific considerations.....	11
4.1. Country unique identifier .....	11
4.2. Self-incorporated HCP .....	11
5. Consent management .....	11
5.1. Consent collection .....	11
5.1.1. HCO consent .....	11

5.1.2.	HCP consent .....	11
5.2.	Management of recipient consent withdrawal.....	11
5.3.	Management of recipient's requests .....	12
5.4.	Partial consent .....	12
6.	Disclosure form .....	12
6.1.	Disclosure platform .....	12
6.1.1.	Date of publication.....	12
6.1.2.	Retention of data .....	12
6.2.	Disclosure language .....	12
6.3.	Pre-disclosure .....	13
7.	Disclosure financial data .....	13
7.1.	Currency .....	13
7.2.	Value Added Tax (VAT) and other taxes .....	13

## 1. Introduction

### Approach to disclosure at AZ

Collaborative working between medical professionals and healthcare organisations has long been a positive driver for advancements in patient care and the development of innovative medicine. Medical professionals and the organisations with whom they work provide the pharmaceutical industry with valuable, independent and expert knowledge derived from their clinical and disease management experience. Furthermore, as the primary point of contact with patients, the medical professional can offer invaluable expert knowledge on patient outcomes and therapy management. This helps to adapt our products to better suit patients and thereby improve patient care overall.

Healthcare professionals and organisations should be fairly compensated for the services they provide to pharmaceutical companies. The EFPIA Disclosure Code provides accuracy and transparency in disclosing the scope and value of such collaborative work, and it will become an important step towards building greater trust between the pharmaceutical industry, medical community and patients.

As a member company of INOVIA and as a full corporate member of EFPIA, AstraZeneca (“AZ”) is committed to transparency around interactions with Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs) and that these are captured and reported in line with all applicable local transparency requirements.

The aims of the EFPIA Disclosure Code and its local interpretation in the Code on the promotion of prescription-only medicines to, and interactions with healthcare professionals – to promote ethical and transparent interactions with the Healthcare community – are fully aligned with AZ’s own policies. Interactions with HCP/HCOs are governed by the AZ Ethical Interactions (EI) Policy and supporting Standards, including zero tolerance for giving or receiving anything of value that is intended or could be seen as improper influence.

Producing transparency reporting is an opportunity for AZ to demonstrate its commitment to the values and principles behind the EFPIA Disclosure Code and other transparency requirements in Europe.

The objective of this note is to explain AZ’s approach to disclosure, to include key definitions, the scope of disclosed activities and key elements of the process followed to capture and report data.

At a high level, there are three main tenets that characterize the AZ approach:

#### **(1) Affiliate accountability and regional consolidation**

Affiliates are responsible for capturing the Transfers of Value (ToVs) made in their affiliates and for validating the accuracy of the data. A regional reporting solution consolidates the ToVs, providing consistency and automating inclusion of cross border payments within Europe. Other cross border payments are collected through a payment system (US) or manually (rest of world).

## **(2) Compliance with local codes**

Unless there are strong legal mandatory requirements, affiliates have transposed the Code in full that is without deviations. In each country, AZ will comply with applicable local disclosure requirements. There may be variations (stricter than the provision in the Code) or deviations (where because of mandatory national regulations the code cannot be transposed in full).

## **(3) One disclosure per market, including all ToVs paid directly through entities belonging to AZ or indirectly through third parties acting on behalf of AZ**

The entity included in reporting for Serbia is: Predstaništvo AstraZeneca UK Limited

For Serbia, disclosure is made on INOVIA website  
<http://www.inovia.rs/index.php/en/>.

## **2. Definitions**

### **2.1. Recipients**

#### **2.1.1. Definition of an HCP**

The definition of an HCP in Serbia is:

Any natural person that is a member of the medical, dental, pharmacy or nursing professions or any other person who, in the course of his or her professional activities, may prescribe, purchase, supply, recommend or administer a medicinal product and whose primary practice, principal professional address or place of incorporation is in Europe. For the avoidance of doubt, the definition of HCP includes: (i) any official or employee of a government agency or other organization (whether in the public or private sector) that may prescribe, purchase, supply or administer medicinal products and (ii) any employee of a Member Company whose primary occupation is that of a practicing HCP, but excludes (x) all other employees of a Member Company and (y) a wholesaler or distributor of medicinal products.

#### **2.1.2. Definition of an HCO**

The definition of an HCO in Serbia is:

Any legal person (i) that is a healthcare, medical or scientific association or organization (irrespective of the legal or organizational form) such as a hospital, clinic, foundation, university or other teaching institution or learned society (except for patient organizations within the scope of the INOVIA PO Code) whose business address, place of incorporation or primary place of operation is in Europe or (ii) through which one or more HCPs provide services.

### **2.2. Kind of ToVs**

### 2.2.1. Donations and Grants

AZ provides support for medical or scientific education, advances in medical or scientific research, health or healthcare systems or disaster relief through financial or non-financial ToVs to legitimate, established organisations.

AZ can provide this support through:

- Contributions or Sponsorships (or referred to as Grants) to support initiatives in HCP Education, including education about healthcare systems and practices, Medical or Scientific Research, or Partnerships.
- Donations to a non-profit or public sector healthcare organisation (HCO) intended to support their charitable mission and activities. Donations and Grants to Patient Organisations or as part of Community Investments to charities and other non-profit non-HCOs are subject to separate disclosure and thus excluded.

Donations to HCOs can be both monetary and donations in kind. Product Donations are given in circumstances of national emergency, international or national disaster relief or other genuine public health need. AZ charitable product donations and processes are aligned to the World Health Organisation (WHO) Guidelines for Drug Donations.

### 2.2.2. Sponsorship agreements

AZ gives contributions, through financial or non-financial support to legitimate, established organisations for medical or scientific education of external stakeholders, organizing or hosting educational or scientific events (including independent congresses). These contributions aim to increase the scientific or educational quality of the event and/or support with logistics in modest venues or with incidental hospitality, in line with AZ's own ethical principles. The mandatory Sponsorship Agreements will describe the purpose of the sponsorship and for what the funds are to be used.

Sponsorship packages may also include satellite symposia and the sponsoring of speakers or faculty.

ToVs are made to either the HCO directly or to an event organizer or other third party appointed by the HCO to manage the event. In all cases, ToVs are disclosed against the HCO that ultimately benefits.

Where contributions made to HCOs include support for travel & accommodation for HCPs to attend Independent Congresses and the HCPs benefitting from this support are unknown, this payment will be assigned to the EFPIA category "Sponsorship Agreements".

### 2.2.3. Registration fees

As part of support to continuous medical education, AZ provides support to HCOs or HCPs to cover the costs of registration fees for HCPs to attend selected

independent congresses and where provided to HCOs, also for other educational/scientific events.

Where these are provided to HCOs, AZ is not involved in the selection of the HCPs.

Where these are provided to individual HCPs, the purpose of the support is to enable delegates (max two per year):

- to attend presentations or participate in scientific exchange on significant developments related to AZ products or uses or related to AZ's scientific research; or,
- to support the performance of a contract for services.

All arrangements are generally paid directly to travel and or /accommodation providers or organiser.

#### 2.2.4. Travel and Accommodation

As part of support to continuous medical education, AZ provides support to HCOs or HCPs to cover the costs for Travel and Accommodation for HCPs to attend selected independent congresses and/or AZ Organised Meetings and where provided to HCOs for other educational/scientific events.

These costs can include costs of flights, trains, hotel accommodation, taxis, bus transfers, and other travel costs.

Costs for ground transportation (for example bus or taxi) that are organised for group transportation and not assigned to certain HCPs are reported in aggregate, but where the identity of the HCPs is known, these are split by HCP.

#### 2.2.5. Fees for service and consultancy and related expenses

AZ engages an HCP/HCO for services when there is a genuine and legitimate business need and where the HCP/HCO is qualified and appropriate to provide the services. These services are paid with a Fee for Service at Fair Market Value.

These services can include:

- Speaking at and chairing meetings
- Training services
- Participation at advisory board meetings
- Medical writing
- Data analysis
- Development of education materials
- General consulting/advising
- Services performed in connection with a third party congress
- Retrospective Non-interventional studies
- Participation in market research where such participation involves remuneration and/or travel. Payments for these services are only disclosed if AZ is aware of the identity of those participating in the market research.

As part of the written Fee for Services Agreement, related expenses can be paid for and can include costs of flights, trains, car hire, tolls, parking fees, taxis, bus transfers, hotel accommodation and any visa costs. All costs are paid by AZ to travel and or /accommodation providers or meeting organizers (where relevant) or reimbursed supported by appropriate receipts.

#### 2.2.6. Research and Development

All ToVs related to the planning or conduct of non-clinical studies, clinical trials and non-interventional studies performed by AZ or by Clinical Research Organisations on AZ's behalf that are prospective in nature are considered Research & Development ToVs and are reported on an aggregate basis.

Retrospective non-interventional studies or other studies that are not submitted to authorities as per local drug law do not fall under the category of R&D activities. The ToVs related to those studies will be reported as Fee for Service under name of the individual recipient.

### **3. Scope of disclosure**

#### **3.1. Products concerned**

AZ is a science focused company, developing innovative medicines that are prescription only medicines and interactions with HCPs/HCOs are focused on the development and promotion of prescription medicines. Consequently, only ToVs relating to prescription medicines are being disclosed.

#### **3.2. Excluded ToVs**

##### 3.2.1. Hospitality costs

As per Section 1.02 of the Disclosure Code, hospitality costs are not disclosable if in line with the limits set within the national association following Art 10 of the HCP Code. AZ applies these limits for AZ Organised & Sponsored Meetings, and therefore costs of meals & drinks are excluded. However, where meals and drinks make up an integral and inseparable part of contributions to the cost of events or sponsoring as part of Sponsorship Agreements with HCOs, they have been included in Contributions to Cost of Events.

##### 3.2.2. Informational and Educational Materials and Items of Medical Utility

As per Section 1.02 of the EFPIA Disclosure Code, items of medical utility for HCPs and informational and educational material are not disclosed where in line with Art 9 of the HCP Code which states that "The transmission of informational or educational



materials is permitted provided it is: (i) “inexpensive”; (ii) directly relevant to the practice of medicine or pharmacy; and (iii) directly beneficial to the care of patients.”

### 3.2.3. Logistical costs

Logistical costs related to AZ Organised Meetings (for example room hire, technicians, personnel) are excluded. However, ToVs to participants, such as support for travel and accommodation or speaker fees to HCPs are included in the relevant cost category.

### 3.2.4. Donations to charitable organisations & Patient Organisations

All ToVs to non-HCO organisations are out of scope and excluded for example charitable organisations.

All ToVs to Patient Organisations are out of scope as separate reporting requirements provide transparency on ToVs to these organisations. These requirements are outlined in the EFPIA Code of Practice on Relationships between the Pharmaceutical Industry and Patient Organisations.

## 3.3. Date of ToVs

Where the ToV is a payment, values are reported on the date of the payment. iPayments made in 2016 for activities related to 2015 are included. If consent to disclose these has been obtained, they are reported against the individual. If not, they will be reported in aggregate.

Where ToVs relate to multi-year contracts, only the ToVs made in the reporting year are included.

Where the ToV is a benefit in kind, values are reported on the date the recipient received the benefit.

## 3.4. Direct ToVs

The natural or legal person that holds the bank account on which the money is transferred is considered the recipient of the ToV and will be disclosed.

Direct ToVs are captured in SAP and flow into the AZ transparency reporting system.. They are then mapped to the appropriate EFPIA disclosure activity category for reporting.

## 3.5. Indirect ToVs

### 3.5.1. Indirect ToVs through Third Parties for R&D Activities

Where a third party providing services for R&D activities acts on behalf of AZ to make ToVs to HCPs/HCOs, these are within scope and are reported at an aggregate level under R&D (as long as their activities fall within the scope of the definition of R&D activities).

### 3.5.2. Indirect ToVs through other third parties

Where third parties are appointed by an HCO to manage an event, and where the HCO ultimately benefits from that ToV, these ToVs are disclosed against the HCO. Where an event is organised on behalf of multiple HCOs without clarity on allocation, the value is divided equally between the HCOs.

Where third parties are appointed by AZ to make travel and accommodation arrangements for HCPs who are providing services or are supported to attend events, these ToVs are disclosed against the HCP.

Any additional administration fees charged by agencies are not included, as these are not ToVs to HCPs or HCOs.

### 3.5.3. Indirect ToVs through HCOs

Where ToVs are made to an individual HCP indirectly via an HCO and where AZ has obtained the consent, these will be disclosed against the HCP in line with local association guidelines.

## **3.6. ToVs in case of partial attendances or cancellation**

Where an HCP/HCO does not receive the benefit due to a no show or a cancellation of event, the associated costs are not reported, such as the cost of cancelling a hotel booking or accommodation. In case of partial attendance, only the benefits actually received are reported.

Where AZ has to pay cancellation fees to HCP/HCOs as per service contracts, due to cancellation of initiatives or events, these payments are reported.

## **3.7. Cross-border activities**

### 3.7.1. Cross-border activities

AZ makes their best efforts to capture and report all ToVs to HCPs and HCOs with their primary practice in a country with EFPIA Disclosure Code and/or other cross border transparency reporting requirements. The country of disclosure will be determined by the address of principal practice for HCPs and the address of registration for an HCO.

Disclosures are made locally, either on each affiliate's website, or on a separate disclosure platform if prescribed by the national code or law.

## **4. Specific considerations**

### **4.1. Country unique identifier**

AZ provides one unique identifier for any HCP or HCO that is to be reported. This ID is generated by AZ and is used to ensure that transactions are reported against the correct recipient to facilitate collection of ToVs throughout Europe and across other affiliates.

### **4.2. Self-incorporated HCP**

Where a self-employed HCP is incorporated in a legal entity that consists of only that one HCP, this is considered as an HCO, as it is a legal entity but remains subject to providing consent, as per data privacy recommendations.

If an HCP is "self-employed" but has not set up a legal entity, they are treated as an individual HCP.

## **5. Consent management**

### **5.1. Consent collection**

#### **5.1.1. HCO consent**

In Serbia HCOs are reported without the need for a consent as they are legal entities, apart from 4.2.

#### **5.1.2. HCP consent**

All efforts have been made at local level to achieve a high level of individual HCP payment disclosure whilst recognising applicable Data Privacy regulations.

Consent is requested from the HCP once, in the first contract for all future engagements in the year for the period the consent is given.

HCPs' data are reported only after consent is given. If no response is received, a "no" response is assumed and the data are reported in aggregate.

### **5.2. Management of recipient consent withdrawal**

Consent to disclose can be withdrawn at any time before and after public disclosure.

- If consent is withdrawn before disclosure the consent value is changed to "No"
- If consent is withdrawn after public disclosure on INOVIA, consent withdrawal follows the process defined by INOVIA.

### 5.3. Management of recipient's requests

Requests or disputes are managed at a local level. HCPs or HCOs should contact email address EFPIArs@astrazeneca.com if they believe any data reported is inaccurate.

Dispute process summary:

- HCP / HCO contacts Predstavništvo AstraZeneca UK Limited via email with request related to EFPIA report of dispute of content of EFPIA report published on INOVIA website
- Predstavništvo AstraZeneca UK Limited sends acknowledgement of receipt of request / dispute and informs the sender that it will resolve the dispute and republish if required within 30 days of receiving notification of the dispute
- Predstavništvo AstraZeneca UK Limited investigates the request / dispute and sends requested information, or dispute reply
- If correction of report is required Predstavništvo AstraZeneca UK Limited initiates correction of EPFIA report

### 5.4. Partial consent

If consent is requested per engagement and the HCP provides partial consent, the final response (yes or no) will be applied to all transactions for that reporting year.

## 6. Disclosure form

### 6.1. Disclosure platform

#### 6.1.1. Date of publication

The date of publication for Serbia is 30.06.2017 in line with EFPIA requirements.

#### 6.1.2. Retention of data

AZ maintains relevant records of the disclosures for a minimum of 5 years.

### 6.2. Disclosure language

Disclosure is made in Serbian and/or English.

### **6.3. Pre-disclosure**

A process does not allow HCPs to review ToVs planned to be published prior to disclosure on the AZ website.

## **7. Disclosure financial data**

### **7.1. Currency**

Disclosure will be made in RSD. For in scope transactions requiring conversion, the calculation will be applied when the transaction is moved to the reporting environment, using the AZ Uniform Reference Environment (AZURE) rates. AZURE is what AZ utilizes for conversion rates for each currency.

### **7.2. Value Added Tax (VAT) and other taxes**

VAT is excluded. Withholding tax is also excluded.

# EFPIA Standard Disclosure Summary Report

Country Code : RS  
 Reporting Currency : RSD  
 Reporting Year : 2016  
 Date Published : 26/06/2017

Full Name	City	Country of Principal Practice	Principal Practice Address	Donations and Grants to HCOs	Contribution to Costs of Events			Fees for Service and Consultancy		Total
					Sponsorship	Registration Fees	Travel & Accommodation	Fees	Related Expenses	
<b>Health Care Professionals (HCPs)</b>										
ALEKSANDAR STANKOVIC	LESKOVAC	RS	SVETOZARA MARKOVICA 116					15,863		15,863
ALEKSANDAR TEPAVAC	SREMSKA KAMENICA	RS	INSTITUTSKI PUT 4					18,066		18,066
ALEKSANDRA MILOSEVIC	BEOGRAD	RS	DR KOSTE TODOROVICA 8				2,806			2,806
ALEKSANDRA PONJEVIC OGRIZ	SOMBOR	RS	VOJVODJANSKA 75				12,607	15,936		28,543
ALEKSANDRA RADOSAVLJEVIC	KRAGUJEVAC	RS	SLOBODE BB				9,056	15,936		24,992
ALEKSANDRA SPASOJEVIC	LAZAREVAC	RS	DR DJORDJA KOVACEVICA 27				19,102	53,122		72,224
ANA ARSENIJEVIC PLECEVIC	ARANDJELOVAC	RS	KRALJA PETRA I 62					15,863		15,863
ANA DJORDJEVIC	BEOGRAD	RS	ZIVOMIRA SAVKOVICA 15				0	0	26,561	26,561
ANA KARADZIC	BEOGRAD	RS	DR KOSTE TODOROVICA 8					21,249		21,249
ARSEN RISTIC	BEOGRAD	RS	DR KOSTE TODOROVICA 8				58,500	147,431	95,914	301,845
BOBAN STOJANOVIC	VRANJE	RS	JOVANA JAKOVLJEVICA LUNGE					53,122		53,122
BRANKA DJURIC PEJOVIC	BEOGRAD	RS	SLOBODANA PENEZICA 23					63,743		63,743
BRANKO BELESLIN	BEOGRAD	RS	DR KOSTE TODOROVICA 8					44,268		44,268
BRATISLAV STEFANOVIC	NIS	RS	BULEBAR ZORANA DJINDJICA 8					12,602	26,561	39,163
DANIJELA COBANOVIC	SREMSKA MITROVICA	RS	STARI SOR 65					2,667	15,494	18,160
DANIJELA KOCIC	NIS	RS	BULEVAR DR ZORANA DJINDJICA					15,936		15,936
DARKO DUJMIC	BEOGRAD	RS	CRNOTRAVSKA 17				33,942	41,471		75,413
DAVORIN RADOSAVLJEVIC	BEOGRAD	RS	PASTEROVA 14					86,429	303,803	390,232
DEJAN SOFRONIC	VALJEVO	RS	SINDJELICEVA 62					9,642	63,303	72,946
DEJAN STOJANOVIC	PETROVAC NA MLAVI	RS	SETONJE BB					3,471	33,939	37,410
DIMITRIJE JOVANOVIC	LESKOVAC	RS	SVETOZARA MARKOVICA 116					15,863		15,863
DJORDJE TAUSAN	BEOGRAD	RS	CRNOTRAVSKA 17					137,231		137,231
DOBRILA MATOVIC	PROKUPLJE	RS	CIRILA I METODIJA 5					12,602	35,414	48,017
DRAGANA RISTIC	NIS	RS	BULEBAR ZORANA DJINDJICA 8					19,888	15,936	35,824
DRAGAN RUDINAC	SMEDEREVO	RS	KNEZ MIHAJLOVA 51					12,942	26,561	39,503

DRAGAN SIMIC	BEOGRAD	RS	DR KOSTE TODOROVICA 8				4,156	51,646		55,802
DRAGICA MIRKOVIC	VALJEVO	RS	SINDJELICEVA 62				18,282	79,682		97,965
DUSAN MILICEVIC	ZEMUN	RS	VUKOVA 9				2,806			2,806
ELIZABETA RASIC	BOR	RS	NIKOLE KOPERNIKA 2-4				18,580			18,580
EMILIJA VIDENOVIC	NIS	RS	BULEVAR DR ZORANA DJINDJIC				26,122	47,809		73,932
FERENC TOTH	BACKA TOPOLA	RS	NADJ JOZEFA 1				30,534	56,663		87,197
GABRIJELA STOJKOVIC	LESKOVAC	RS	SVETOZARA MARKOVICA 116					106,243		106,243
GORAN COLAKOVIC	BEOGRAD	RS	FRANSE DEPEREA 5					35,414		35,414
GORAN STANKOVIC	ZAJECAR	RS	RASADNICKA BB				8,250	53,122		61,372
GORAN STOJANOVIC	SREMSKA KAMENICA	RS	INSTITUTSKI PUT 4					37,628		37,628
GORDANA KOVACEVIC	UZICE	RS	MILOSA OBRENOVICA 17				13,955	26,561		40,516
GORDANA STOJANOVIC	ARANDJELOVAC	RS	KRALJA PETRA I 62				18,956			18,956
GORDANA VELJOVIC	PANCEVO	RS	MILOSA TREBINJCA 11				1,000			1,000
IGOR MRDOVIC	BEOGRAD	RS	DR KOSTE TODOROVICA 8				4,156	55,335		59,491
ILINKA TODOROVSKA	NIS	RS	BULEVAR DR ZORANA DJINDJIC				33,471	36,024		69,495
IVANA STANKOVIC	NIS	RS	BULEVAR DR ZORANA DJINDJIC				37,289	195,809		233,098
IVANA ZOGOVIC	ZRENJANIN	RS	PETEFIJEVA 4					26,561		26,561
IVANKA DAMNJANOVIC	BEOGRAD	RS	OLGE JOVANOVIC 11				9,005	25,823		34,828
IVAN TASIC	NISKA BANJA	RS	SRPSKIH JUNAKA 2				15,000	36,890		51,890
JASMINA NEDOVIC	KRAGUJEVAC	RS	ZMAJ JOVINA 30				29,500	40,579		70,079
JELENA DENCIC	PIROT	RS	VOJVODE MOMCILA BB					26,561		26,561
JELENA KARAJOVIC	BEOGRAD	RS	CRNOTRAVSKA 17			126,125	23,089			149,214
JELENA LUKIC PETROV	ZRENJANIN	RS	DR VASE SAVICA 5					15,936		15,936
JELENA PRODANOVIC	ARANDJELOVAC	RS	KRALJA PETRA I 62				13,594			13,594
JELENA STANKOVIC	KRAGUJEVAC	RS	ZMAJ JOVINA 30				3,500	22,134		25,634
JOVAN BALINOVAC	VALJEVO	RS	SINDJELICEVA 62					21,027		21,027
JOVANKA GAVRILOVIC	PANCEVO	RS	MILOSA TREBINJCA 11					19,921		19,921
JOVANKA NOVAKOVIC - PARO	NOVI SAD	RS	HAJDUK VELJKOVA 1-9					56,073		56,073
JOVAN STOILJKOVIC	BEOGRAD	RS	CARA DUSANA 187					26,561		26,561
KATARINA MILOSEVIC	BEOGRAD	RS	TIRSOVA 10					70,829		70,829
KATARINA ODANOVIC	VALJEVO	RS	SINDJELICEVA 62				11,704	33,939		45,642
KATICA ARANDJELOVIC	CUPRIJA	RS	MIODRAGA NOVAKOVICA 78				14,080	42,497		56,578
KORNELIJA JAKSIC HORVAT	SUBOTICA	RS	IZVORSKA 3					33,201		33,201
LIDIJA DJURICIC ZIVKOVIC	SABAC	RS	POPA KARANA 2- 4					26,561		26,561
LIDIJA SAVIC	BEOGRAD	RS	XI KRAJISKE DIVIZIJE 57					21,249		21,249

LJILJANA MARKOVIC	BEOGRAD	RS	GOCE DELCEVA 30				5,611	44,756		50,366
LJILJANA RADENKOVIC	PETROVAC NA MLAVI	RS	SETONJE BB				17,557			17,557
LJUBICA STANOJEVIC	KRAGUJEVAC	RS	SLOBODE BB				9,056	26,561		35,617
MARIJA GLAVINIC MIJIC	ZEMUN	RS	RADA KONCARA 46				5,611	25,823		31,434
MARIJANA PEJIC	BEOGRAD	RS	DR KOSTE TODOROVICA 8					21,249		21,249
MARIJA POPIN TARIC	ZEMUN	RS	VUKOVA 9					26,561		26,561
MARIJA ZDRAVKOVIC	BEOGRAD	RS	BEZANIJSKA KOSA BB					36,890		36,890
MARINA CEKIC	NIS	RS	BULEVAR ZORANA DJINDJICA 4					36,890		36,890
MARINA PETROVIC	GORNJA TOPONICA	RS	STEVANA SINDJELICA 39					92,088		92,088
MILA KOVACEVIC	SREMSKA KAMENICA	RS	INSTITUTSKI PUT 4				25,490	35,414		60,904
MILAN DOBRIC	BEOGRAD	RS	DR KOSTE TODOROVICA 8				2,806	40,579		43,385
MILAN PAVLOVIC	NIS	RS	BULEVAR DR ZORANA DJINDJICA				65,212			65,212
MILAN PETAKOV	BEOGRAD	RS	DR SUBOTICA 13					125,426		125,426
MILAN RANCIC	NIS	RS	BULEVAR DR ZORANA DJINDJICA		33,942		100,971	171,217		306,130
MILENA MITROVIC	NOVI SAD	RS	HAJDUK VELJKOVA 1-9				13,333	37,920		51,253
MILENA TRNINIC STANKOVIC	NIS	RS	BULEBAR ZORANA DJINDJICA 8				19,888	42,497		62,385
MILIJA GAJIC	BEOGRAD	RS	VISEGRADSKA 26		33,942		41,471			75,413
MILIVOJ VISACKI	VRSAC	RS	ABRASEVICEVA BB				6,850	35,857		42,707
MILKA VRANJANAC TEPIC	KRUSEVAC	RS	KOSOVSKA 16				22,805	97,390		120,194
MILOJE TOMASEVIC	BEOGRAD	RS	DR KOSTE TODOROVICA 8				4,156	39,841		43,998
MILOS RADOJICIC	LOZNICA	RS	BOLNICKA BB				6,954	26,561		33,514
MIODRAG DIKIC	BEOGRAD	RS	DR KOSTE TODOROVICA 8					33,201		33,201
MIODRAG DJORDJEVIC	ZAJECAR	RS	RASADNICKA BB				69,380	36,890		106,270
MIODRAG VUKCEVIC	BEOGRAD	RS	VISEGRADSKA 26					267,523		267,523
MIRA VASILJEVIC	BEOGRAD	RS	CRNOTRAVSKA 17					19,921		19,921
MIRELA VUCKOVIC	POZAREVAC	RS	JOVANA SERBANOVICA 10				16,390			16,390
MIRJANA LAPCEVIC	BEOGRAD	RS	KRIVOLACKA 4-6				4,394	26,561		30,954
MIRJANA SUMARAC DUMANOV	BEOGRAD	RS	DR SUBOTICA 13				64,869	128,377		193,246
MIRKO MILICEVIC	ARANDJELOVAC	RS	KRALJA PETRA I 62					70,829		70,829
MIROSLAVA MILOSEVIC	BEOGRAD	RS	DR KOSTE TODOROVICA 8					15,936		15,936
MIROSLAV VUKOMANOVIC	SID	RS	ALEKSE SANTICA 1				18,976			18,976
NADA PETKOVSKI	PANCEVO	RS	MILOSA TREBINJCA 11					15,936		15,936
NADICA BLAGOJEVIC	NIS	RS	BULEBAR ZORANA DJINDJICA 8				12,602	46,481		59,084
NENAD BOZINOVIC	NIS	RS	BULEVAR DR ZORANA DJINDJICA					35,414		35,414
NEVENA BANKOVIC MILENKOVIC	SURDULICA	RS	SRPSKIH VLADARA 141					22,134		22,134



NEVENA SECEN	SREMSKA KAMENICA	RS	INSTITUTSKI PUT 4					93,701		93,701
NIKOLA JAGIC	KRAGUJEVAC	RS	ZMAJ JOVINA 30				13,000	79,682		92,682
OLGA MARASANIN	OBRENOVAC	RS	VOJVODE MISICA 231				7,870			7,870
OLGICA STANIC-BUGARCIC	SABAC	RS	POPA KARANA 2- 4				2,500	70,829		73,329
OLIVERA BOSKOVIC	PODGORICA	RS	LJUBLJANSKA BB					88,643		88,643
OLIVERA MICIC	UZICE	RS	MILOSA OBRENOVICA 17					35,414		35,414
OLIVERA VUJADINOVIC	SABAC	RS	POPA KARANA 2- 4					21,027		21,027
PETAR SEFEROVIC	BEOGRAD	RS	DR KOSTE TODOROVICA 8					119,696		119,696
RADE BABIC	BEOGRAD	RS	HEROJA MILANA TEPIKA 1				4,156	88,536		92,692
RADE MILIC	BEOGRAD	RS	CRNOTRAVSKA 17				145,950	125,278		271,228
RADIVOJ JEZERKIC	NOVI SAD	RS	ZMAJ OGNJENA VUKA 19				11,394	28,440		39,834
RADMILA JANKOVIC	BEOGRAD	RS	PASTEROVA 14					281,887		281,887
RADOSAV SAROVIC	UZICE	RS	MILOSA OBRENOVICA 17				19,705	79,682		99,388
RADOSLAV ROMANOVIC	BEOGRAD	RS	CRNOTRAVSKA 17				4,156	35,414		39,571
RATKO LASICA	BEOGRAD	RS	DR KOSTE TODOROVICA 8				4,156	70,829		74,985
ROBERT JUNG	SREMSKA KAMENICA	RS	INSTITUTSKI PUT 4				20,350	99,603		119,953
SANJA SARAC	BEOGRAD	RS	CRNOTRAVSKA 17					26,561		26,561
SANJA SIMIC OGRIZOVIC	BEOGRAD	RS	PASTEROVA 2				24,868	132,804		157,672
SASA HINIC	BEOGRAD	RS	BEZANIJSKA KOSA BB					68,615		68,615
SASA JOVANOVIC	NIS	RS	BULEBAR ZORANA DJINDJICA 8				23,595	106,686		130,280
SASA KIKOVIC	BEOGRAD	RS	CRNOTRAVSKA 17				4,394			4,394
SINISA RADULOVIC	BEOGRAD	RS	PASTEROVA 14				151,657	109,932		261,589
SINISA STOJKOVIC	BEOGRAD	RS	DR KOSTE TODOROVICA 8				4,156	234,620		238,777
SLADJANA DROBNJAK	BEOGRAD	RS	NARODNIH HEROJA 38				5,611	26,561		32,172
SLAVICA CIRKOVIC	POZAREVAC	RS	JOVANA SERBANOVICA 10				12,656	60,131		72,787
SLAVICA KNEZEVIC USAJ	SREMSKA KAMENICA	RS	INSTITUTSKI PUT 4					40,579		40,579
SLAVICA MITROVIC	PROKUPLJE	RS	CIRILA I METODIJA 5					15,936		15,936
SLOBODAN ACIMOVIC	BEOGRAD	RS	CRNOTRAVSKA 17					44,240		44,240
SLOBODAN ANTIC	NIS	RS	BULEVAR DR ZORANA DJINDJIC				22,727	89,669		112,396
SMILJANA ORLOVIC	BEOGRAD	RS	CARA DUSANA 187					53,122		53,122
SNEZANA DESPOTOVIC KUSLJI	BEOGRAD	RS	KNEZ DANILOVA 16					25,823		25,823
SNEZANA DJOKIC MILOJEVIC	PROKUPLJE	RS	PASJACKA 2					15,863		15,863
SNEZANA JOTIC	PIROT	RS	VOJVODE MOMCILA BB				26,602	53,122		79,724
SNEZANA KOMNENOVIC	BEOGRAD	RS	DR KOSTE TODOROVICA 8					29,512		29,512
SNEZANA KUZMIC JANKOVIC	BEOGRAD	RS	CRNOTRAVSKA 17					35,414		35,414

SNEZANA PILIPOVIC	BEOGRAD	RS	CARA DUSANA 187					26,561		26,561
SNEZANA ZDRAVKOVIC	KRUSEVAC	RS	KOSOVSKA 16			83,750	288,415	92,077		464,242
SONJA MRDOVIC	SABAC	RS	POPA KARANA 2- 4				4,567			4,567
SONJA SALINGER MARTINOVIC	NIS	RS	BULEVAR DR ZORANA DJINDJIC				18,684	88,536		107,220
SRDJAN BOSKOVIC	BEOGRAD	RS	HEROJA MILANA TEPICA 1					35,414		35,414
SRDJAN POPOVIC	BEOGRAD	RS	DR SUBOTICA 13				7,394			7,394
SVETLANA APOSTOLOVIC	NIS	RS	BULEVAR DR ZORANA DJINDJIC				4,156	95,176		99,333
SVETLANA JELIC	BEOGRAD	RS	BEZANIJSKA KOSA BB				54,009	37,920		91,929
SVETLANA MILANOV	BEOGRAD	RS	FRANSE DEPEREA 5				4,703	15,936		20,640
SVETLANA PRICA POPOVIC	SREMSKA MITROVICA	RS	STARI SOR 65				2,954	26,561		29,514
TANJA JOZIC	BEOGRAD	RS	DR KOSTE TODOROVICA 8				4,156	21,249		25,405
TATJANA ZECEVIC	PROKUPLJE	RS	CIRILA I METODIJA 5					15,936		15,936
TEODORA BELJIC-ZIVKOVIC	BEOGRAD	RS	DIMITRIJA TUCOVICA 161					166,400		166,400
VALENTIN PETROV	NIS	RS	BULEBAR ZORANA DJINDJICA 8			0	8,988	73,334		82,322
VANESA SEKERUS	SREMSKA KAMENICA	RS	INSTITUTSKI PUT 4					29,512		29,512
VERA KRSMANOVIC	LOZNICA	RS	VLADISLAVA BRONJEVSKOG 65				17,909	46,481		64,390
VESNA DOPUDJA-PANTIC	BEOGRAD	RS	DIMITRIJA TUCOVICA 161				137,002	101,816		238,818
VESNA MARJANOVIC	VELIKA PLANA	RS	MILOSA VELIKOG 110				14,080			14,080
VESNA MILOSAVLJEVIC	LESKOVAC	RS	SVETOZARA MARKOVICA 116				24,269	26,561		50,830
VIOLETA MLADENOVIC	KRAGUJEVAC	RS	ZMAJ JOVINA 30				10,108	36,890		46,998
VLADAN VUKCEVIC	BEOGRAD	RS	DR KOSTE TODOROVICA 8			143,753	201,446	230,194		575,392
VLADIMIR PAZIN	BEOGRAD	RS	NARODNOG FRONTA 62					150,483		150,483
VLADIMIR TRAJKOVIC	JAGODINA	RS	KARADJORDJEVA 4				177,832	127,492		305,324
VOJISLAV CUPURDIJA	KRAGUJEVAC	RS	ZMAJ JOVINA 30				7,000	35,414		42,414
ZAKLINA MIJOVIC	NIS	RS	BULEVAR ZORANA DJINDJICA 4				8,500	49,296		57,796
ZAKLINA RISTIC	TRSTENIK	RS	SVETOG SAVE 49					33,939		33,939
ZLATA BOGICEVIC	SABAC	RS	POPA KARANA 2- 4				2,500	70,829		73,329
ZORANA DJURAN	BEOGRAD	RS	CRNOTRAVSKA 17					35,414		35,414
ZORAN HAJDUKOVIC	BEOGRAD	RS	CRNOTRAVSKA 17					35,414		35,414
ZORAN JOVIC	BEOGRAD	RS	CRNOTRAVSKA 17				4,156	21,249		25,405
ZORICA DJURIC	LOZNICA	RS	VLADISLAVA BRONJEVSKOG 65				47,145	69,353		116,499
ZORICA SLAVKOVIC	POZAREVAC	RS	JOVANA SERBANOVICA 10				22,890	53,122		76,011
ZORICA ZIVANOVIC	SMEDEREVO	RS	KNEZ MIHAJLOVA 51				4,150	42,497		46,647
ZVIJEZDANA VUKMIROVIC	PANCEVO	RS	MILOSA TREBINJCA 11					53,122		53,122

OTHER HCPs Not Included Above - Information cannot be disclosed on an individual basis for legal reasons

<b>Transfers of Value - Aggregate Amount</b>				2,286,587	9,586,911	16,734,920		28,608,419
<b>Number of Recipients in Aggregate Disclosure</b>				27	409	244		530
<b>% of Number of Recipients - Aggregate Disclosure</b>				75	80.35	63		76

Health Care Organisations (HCOs)								
AMEC AKADEMSKI MEDICINSKI	BEOGRAD	RS	JURIJA GAGARINA 26A/III/6	2,986,856	422,100	370,211		3,779,167
Asocijacija za preventivnu pedijatri	PODGORICA	RS	TRG NIKOLE KOVACEVICA 6		0			0
DRUSTVO LEKARA KOSOVA I M	KOSOVSKA MITROVICA	RS	ANRI DINANA BB		0			0
DRUSTVO LEKARA URGENTNE	NIS	RS	BULEVAR NEMANJICA 19/33		80,000			80,000
DRUSTVO LEKARA VOJVODINE	NOVI SAD	RS	VASE STAJICA 9		90,000			90,000
DRUSTVO LEKARA VOJVODINE	SOMBOR	RS	VOJVODJANSKA 75		18,000			18,000
DRUSTVO LJEKARA CRNE GOR	PODGORICA	RS	JOVANA TOMASEVICA 4		0			0
DRUSTVO ZA BORBU PROTIV R	SOMBOR	RS	CONOPLJANSKA 15D	120,000				120,000
DZ DOKTOR BOSKO VREBALOV	ZRENJANIN	RS	SVETOSAVSKA 31	19,248				19,248
DZ VALJEVO	VALJEVO	RS	ZELEZNICKA BB	19,248				19,248
FAKULTET MEDICINSKIH NAUK	KRAGUJEVAC	RS	SVETOZARA MARKOVICA 69	100,000				100,000
FRANCUSKO-SRPSKO ONKOLC	SREMSKA KAMENICA	RS	PUT DR GOLDMANA 4		300,000			300,000
GRADSKA PODRUZNICA SRPSK	NIS	RS	BULEVAR DR ZORANA DJINDJI		1,449,757			1,449,757
GRADSKI ZAVOD ZA HITNU MEI	BEOGRAD	RS	FRANSE DEPEREA 5	128,318				128,318
GRADSKI ZAVOD ZA PLUCNE B	BEOGRAD	RS	PRESEVSKA 35	420,000				420,000
IKVB SREMSKA KAMENICA	SREMSKA KAMENICA	RS	INSTITUTSKI PUT 4	320,795				320,795
INSTITUT ZA KARDIOVASKULAF	BEOGRAD	RS	HEROJA MILANA TEPIKA 1	64,159			60,000	124,159
INSTITUT ZA ONKOLOGIJU I RA	BEOGRAD	RS	PASTEROVA 14	15,163,741				15,163,741
INSTITUT ZA ONKOLOGIJU SRE	SREMSKA KAMENICA	RS	INSTITUTSKI PUT 4		50,000			50,000
INSTITUT ZA PLUCNE BOLESTI	SREMSKA KAMENICA	RS	INSTITUTSKI PUT 4	8,713,701	855,744			9,569,445
KBC BEZANIJSKA KOSA	BEOGRAD	RS	BEZANIJSKA KOSA BB	192,477				192,477
KBC ZEMUN	ZEMUN	RS	VUKOVA 9	320,795				320,795
KBC ZVEZDARA	BEOGRAD	RS	DIMITRIJA TUCOVICA 161	870,795				870,795
KC KRAGUJEVAC	KRAGUJEVAC	RS	ZMAJ JOVINA 30	189,748				189,748
KC KRAGUJEVAC - KLINIKA ZA I	KRAGUJEVAC	RS	ZMAJ JOVINA 30	440,865				440,865
KC NIS - KLINIKA ZA KARDIOLO	NIS	RS	BULEVAR DR ZORANA DJINDJI	128,318				128,318
KC NIS - KLINIKA ZA ONKOLOGI	NIS	RS	BULEVAR DR ZORANA DJINDJI	86,981				86,981
KC NIS - KLINIKA ZA PLUCNE B	NIS	RS	BULEVAR ZORANA DJINDJICA 4	604,500				604,500
KCS - KLINICKI CENTAR SRBIJE	BEOGRAD	RS	PASTEROVA 2		741,000			741,000
KCS - KLINIKA ZA ENDOKRINOL	BEOGRAD	RS	DR SUBOTICA 13	61,325				61,325
KCS - KLINIKA ZA KARDIOVASK	BEOGRAD	RS	DR KOSTE TODOROVICA 8	1,924,767				1,924,767

KCS - KLINIKA ZA PLUCNE BOLI	BEOGRAD	RS	VISEGRADSKA 26	18,575					18,575
NVO DRUSTVO ZA BORBU PRO	BAR	RS	JOVANA TOMASEVICA G9, II		0				0
OPSTA BOLNICA LESKOVAC	LESKOVAC	RS	RADE KONCAR 9	64,159					64,159
OPSTA BOLNICA PETROVAC NA	PETROVAC NA MLAVI	RS	MORAVSKA 2	32,079					32,079
OPSTA BOLNICA POZAREVAC	POZAREVAC	RS	BRATSTVA JEDINSTVA 135	96,238					96,238
OPSTA BOLNICA SENTA	SENTA	RS	KARADJORDJEVA 64	32,079					32,079
OPSTA BOLNICA SREMSKA MIT	SREMSKA MITROVICA	RS	STARI SOR 65	96,238					96,238
OPSTA BOLNICA SURDULICA	SURDULICA	RS	SRPSKIH VLADARA 141	32,079					32,079
OPSTA BOLNICA VALJEVO	VALJEVO	RS	SINDJELICEVA 62	109,070					109,070
OPSTA BOLNICA VRBAS	VRBAS	RS	MILANA CEKICA 4	64,159					64,159
PREDUZECE ZA PROMET I USL	BEOGRAD	RS	DALMATINSKA 107	1,144,560	203,574				1,348,134
RESPIRATORNO UDRUZENJE S	BEOGRAD	RS	DR KOSTE TODOROVICA 26	491,520	3,342,080				3,833,600
SRPSKO DRUSTVO ZA REPROU	BEOGRAD	RS	DR SUBOTICA 13		737,640				737,640
SRPSKO LEKARSKO DRUSTVO	BEOGRAD	RS	DZORDZA VASINGTONA 19	585,600	2,632,120				3,217,720
SRPSKO LEKARSKO DRUSTVO	SABAC	RS	POPA KARANA 4		40,000				40,000
SRPSKO ONKOLOSKO DRUSTV	BEOGRAD	RS	GUNJAK 20G		150,000				150,000
UDRUZENJE INTERNISTA SRBI	NIS	RS	JOVANA RISTICA 20/2		1,000,000				1,000,000
UDRUZENJE KARDIOLOGA SRB	BEOGRAD	RS	KOSTE TODOROVICA 8	2,218,473	2,590,416				4,808,889
UDRUZENJE KORONARNIH JED	BEOGRAD	RS	PASTEROVA 2	373,500					373,500
UDRUZENJE MEDIKALNIH ONKO	BEOGRAD	RS	PASTEROVA 14	1,070,000	184,768				1,254,768
UDRUZENJE PATOLOGA I CITO	ZEMUN	RS	VUKOVA 9		200,000				200,000
UDRUZENJE PRIVATNIH APOTE	BEOGRAD	RS	OTONA ZUPANCICA 20/97	140,000	66,000				206,000
UDRUZENJE ZA ATEROSKLERC	BEOGRAD	RS	KNEZA MIHAILA 35		125,000				125,000
UDRUZENJE ZA DIJABETES SRI	BEOGRAD	RS	DR SUBOTICA 13	360,000	496,000				856,000
UDRUZENJE ZA HIPERTENZIJU	NIS	RS	JOVANA RISTICA 20/2	600,000					600,000
UDRUZENJE ZA PREVENTIVNU	NIS	RS	VOJVODE TANKOSICA 15				48,325		48,325
UDRUZENJE ZA SRCANU SLAB	BEOGRAD	RS	KOSTE TODOROVICA 8	740,400					740,400
UGOSCGRS UDRUZENJE GINEH	BEOGRAD	RS	DR KOSTE TODOROVICA 26		504,000				504,000
VMA - KLINIKA ZA PULMOLOGIJ	BEOGRAD	RS	CRNOTRAVSKA 17	306,625					306,625
VMA - VOJNOMEDICINSKA AKAI	BEOGRAD	RS	CRNOTRAVSKA 17	3,368,051					3,368,051
ZAVOD ZA HITNU MEDICINSKU	KRAGUJEVAC	RS	SLOBODE BB	96,238					96,238
ZAVOD ZA HITNU MEDICINSKU	NIS	RS	VOJISLAVA ILICA BB	128,318					128,318
ZAVOD ZA HITNU MEDICINSKU	NOVI SAD	RS	VRSAKA 28	32,079					32,079
ZC ARANDJELOVAC	ARANDJELOVAC	RS	KRALJA PETRA I 62	32,079					32,079
ZC CACAK	CACAK	RS	DR DRAGISE MISOVICA 205	64,159					64,159

