

Code of conduct on Transparency of Financial Relations

(non-official translation of the Dutch 'Gedragsregels openbaarmaking financiële relaties')

The definitions as applied in this Code comply with the definitions in the CAVP Code of Conduct regarding the promotion of veterinary products (hereinafter: the CAVP).

Article 1:

A financial relation is a direct or indirect financial or non-financial support from a company to which the CAVP applies (hereinafter: "company") to a member of the animal health professions (hereinafter: "animal health professional") registered and/or practicing in The Netherlands or to a collaboration of animal health professionals and/or to an animal health institution in which the animal health professional participates or is employed by.

This Code covers the financial relations derived from the following agreements:

- (a) Service agreements between a company and (partnerships of) animal health professional(s) as stipulated in Article 7.3 of the CAVP;
- (b) Sponsoring agreements between companies and partnerships of animal health professionals and/or to an animal health institution in which the animal health professional participates or is employed by as stipulated in Article 7.4 last sentence of the CAVP.

This Code is equally applicable to agreements as mentioned in a and b above in case agreed between animal health professionals/partnerships of animal health professionals/institutions and a third party acting on behalf of licence holder.

Article 2:

If the total amount of one or more financial relations between the company and the animal health professional or the partnership of animal health professionals and/or the animal health institution in which the animal health professional participates or is employed by is beyond € 500,- per calendar year, the parties shall disclose within the time period as per instruction by the register following the calendar year the financial relation has been executed:

- (a) The nature of the agreement according to the selection table and the calendar year wherein the agreement has been executed, and
- (b) The name, the registered address and/or Chamber of Commerce number of the company, and
- (c) For service agreements mentioned in article 1a above:
 - Personal data (name, field of expertise and working address) of the animal health professional that in fact has provided the services (irrespective that the animal health professional is favoured by the financial support) and the total amount of service fees paid to the animal health professional and/or to the actual provider of the service (excluding any related costs and expenses) during the specific calendar year, on the condition that the total amount of fees paid in the calendar year is more than € 500,-, and
 - The data (name, registered address and Chamber of Commerce number) of the partnership of animal health professionals and/or the an animal health institution in which the animal health professional participates or is employed by, and the total amount paid during the specific calendar year for as far as the service agreement is agreed with the partnership and/or institution, and
- (d) For sponsoring agreements as mentioned in article 1b above:

The data (name, professional address and number of Chamber of Commerce) of the partnership of animal health professionals and/or the an animal health institution with which the financial relation is entered into and the amounts paid during the specific calendar year.

Article 3:

The financial relation, which has to be disclosed, should be recorded in a written agreement which shows the following:

- a) the details that should be disclosed in accordance with Article 2;
- b) the procedure of disclosure and the party responsible for the disclosure of the details as mentioned in Article 2.

Article 4:

Disclosure according to Article 2 takes place by the party who is committed to disclose, as recorded in the agreement based on Article 3, in the register which is set for the registration of financial relations.

Article 5:

The company shall arrange an adequate internal procedure to ensure that the disclosure of the financial relations complies with this Code.

Article 6:

Within 3 months after the calendar year the company shall provide the animal health professional, the partnership of animal health professionals and/or the animal health institution in which animal health professionals participate or are employed by, whom has been entered into a financial relation, with an annual statement which includes the details that has to be disclosed according to Article 2.

Article 7:

The disclosure according to Articles 2 and 4 applies for 3 years. Upon completion of the term the administrator of the register shall erase all the disclosed information from the register.

Article 8:

This Code shall enter into force effective January 1st, 2013.