Marketing Practices by Pharmaceutical Companies

Status and Proposed Way Forward

Following discussion with High Level Committee

November 2022

Table of Contents

1 Role of Pharmaceutical industry

2 Marketing Practices across different sectors

Global Practices comparison and Recommendations

Appendix 1 – Comparison of global guidelines



Role of pharmaceutical industry



- The pharmaceutical sector is a knowledge-based industry with thrust on medical progress and patient care, thereby improving the health outcomes
- The industry aims to enhance medical knowledge, requiring engagement with HCPs in the form of medical education and professional/scientific interactions

Patient centricity



- Patient centricity is fundamental, and the pharmaceutical industry takes every opportunity to earn, sustain and build trust
- Interaction with HCPs is critical and helps improve awareness regarding the latest developments in the medical field

Knowledge Dissemination

- Pharmaceutical companies' relationships with HCPs are critical in achieving goals as they enable to:
 - o inform HCPs about the benefits and risks of products to help advance appropriate patient use
 - provide scientific and educational information
 - o support medical research and education

Marketing practices across different sectors (FMCG, Automotive)

Section 194 R not applicable to select practices

Program

Key Features

Dealers Conference

- Dealer conferences are primarily arranged for education/information sharing for Dealers/Channel Partners rather than with the motive to host them for recreational purposes/providing any fringe benefits
- Such conferences include the following program i.e., product launch, training, dealer workshop meets, Information Sharing, meeting Leadership Team, addressing queries, concerns, feedback on products
- Accommodation and Travel expenses for attending such conference restricted to the days of the conference (max 1 day prior/after) is borne by the Company

Dealers Training

• Specific dealers who are high performers or high potential dealers are invited for a factory visit. These visits are scheduled with the objective of training the dealers and equipping them with the required technical expertise about the company's products and all the expenses are borne by the Company

Corporate Gifting

- Automotive Company sends gifts to all its dealers twice a year on two occasions i.e., Diwali and New Year which could include hampers, the company's branded calendars, diaries, pens, mugs etc. Further, on the dealers' birthdays/anniversaries, the company also sends them a congratulatory cakes, bouquets and chocolates
- FMCG Gift items to Third Parties/ Channel Partners are provided in the festive season with a view to pass the same to end consumers and hence is no benefit/perquisite arising Third Parties/ Channel Partners

Global Practices comparison and Recommendation (1/5)

The below table shows recommendations and it's comparison with global guidelines (Appendix 1 for detailed comparison)



1. Educational Items / Brand Reminders

IFPMA Code of Practice (Europe)

- Promotional aids of minimal value may be provided
- Information and educational items provided to HCPs for their education or for the education of patients on disease

AAM Code of Business Ethics (United States)

 Items designed for education of patients if the items are of modest value and do not have value to healthcare professionals outside of his or her professional responsibilities

Medicines for Europe Code of Conduct (Europe)

 Companies may occasionally provide educational materials, inexpensive medical utility items and inexpensive promotional items (for example a pen) to individual HCPs

PhRMA Code on Interactions with HCP (United States)

 Items designed for education of patients or HCPs which is not of substantial value (\$100 or less), not offered more than on occasional basis and do not have value to HCPs outside of their professional responsibilities

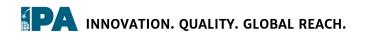


Recommendations

It is recommended to allow for occasional and modest items such as:

- Informational or educational items (such as books, e-modules, journals subscriptions to the online medical portal, models, medical books, clinical treatment guidelines and journals) for the education of patients on disease and its treatments primarily for educational purposes and do not have independent value
- Brand recall items /Brand reminders/ Cultural courtesies which are customary courtesies and are reasonable in value and frequency can be provided. However they should not exceed the cost of IRN 1,000 per item
- Items of medical utility may be offered on occasional basis if such items are of modest value, do not offset routine business practices and are beneficial to enhancing the provision of medical services and patient care

IFPMA – The International Federation of Pharmaceutical Manufacturers & Associations; AAM – Association for Accessible Medicines; PhRMA – Pharmaceutical Research and Manufacturers of America



Global Practices comparison and Recommendation (2/5)

The below table shows recommendation and it's comparison with global guidelines (Appendix 1 for detailed comparison)



2. Samples

IFPMA Code of Practice (Europe)

- Free samples may be supplied to HCPs authorized to prescribe that product in order to enhance patient care
- Samples should be marked as such so that they cannot be resold or otherwise misused

AAM Code of Business Ethics (United States)

- Samples for patient use in accordance with Prescription Drug Marketing Act can be provided
- Samples not be used as payment for services, return for favorable treatment, or other inappropriate inducements

Medicines for Europe Code of Conduct (Europe)

 Medical samples only by exception and on occasional basis be provided, if in accordance with local legal restrictions on amounts and frequency.

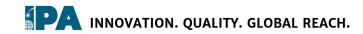
PhRMA Code on Interactions with HCP (United States)

 Samples for patient use in accordance with Prescription Drug Marketing Act can be provided.



Recommendations

- Samples to HCPs to be able to acquire demonstrable product experience and for better patient care. This is a global practice as per all the guidelines
- Packaging must clearly indicate that product cannot be resold and is to be provided in accordance with the Prescription Drug Marketing Act
- In India, samples are packaged differently with a clear indication "Not for sale". The companies have systems up until the Medical-Representative level to monitor the distribution. Monitoring at each doctor level may be difficult, given the field force size, number of doctors and material value of samples. This is not a benefit accruing to the doctor and hence, should not be considered as income both for HCPs and companies. However, if required the cost of samples equivalent upto 2% of total revenue may be allowed. Samples to cover both existing as well as new products



Global Practices comparison and Recommendation (3/5)

The below table shows recommendation and it's comparison with global guidelines (Appendix 1 for detailed comparison)



3. Affiliation, Travel and Hospitality

IFPMA Code of Practice (Europe)

- Scientific events that derive participants from many countries are permitted only if justified to do so from the logistical or security point of view
- Hospitality provided must not exceed what participants would normally be prepared to pay for themselves

AAM Code of Business Ethics (United States)

- Consulting or advisory arrangements lacking a bona fide business purpose should not be used to justify compensating HCPs for their travel
- Consultants and speakers (not non-faculty and non-consultant HCP attendees) to be offered reimbursement for reasonable travel

Medicines for Europe Code of Conduct (Europe)

- Travel should always be on the most direct and logical route, taking into account costs to the company
- Must not fund or facilitate stop overs
- Actively discourage the accompaniment of uninvites guests on company funded travel

PhRMA Code on Interactions with HCP (United States)

- Reimbursements of reasonable travel who provide advisory services are permitted
- Financial support should not be offered for the costs of travel of non-faculty HCPs attending CME or third-party scientific or educational conferences or professional meetings



Recommendations

- Companies be allowed to engage HCPs to provide consulting services under a contract involving consultancy fee/honorarium based on fair market value.
- Allowing of modest and reasonable travel, lodging and meals to HCPs in performance of the consulting services as a speaker/faculty and modest meals/refreshments / local logistics to HCPs who are recipients of such knowledge transfers
- All events should be held in an appropriate venue that is conducive to the scientific or educational objectives and the purpose of the event or meeting.

Global Practices comparison and Recommendation (4/5)

The below table shows recommendation and it's comparison with global guidelines (Appendix 1 for detailed comparison)



4. Medical Research

IFPMA Code of Practice (Europe)

 HCPs may be engaged as consultants and advisors for services such as involvement in medical/scientific studies, clinical trials where such participation involves remuneration.



Recommendations

- IPA recommends allowing Companies to conduct / fund medical research for advancing medical care, clinical science, etc. by engaging healthcare practitioners to carry out, participate and work on such projects, subject to fulfilment of certain conditions.
- Market research must not be used as a mechanism for channeling non-disclosable payments to a particular group of HCPs.

Global Practices comparison and Recommendation (5/5)

The below table shows recommendation and it's comparison with global guidelines (Appendix 1 for detailed comparison)



5. Training and educational Program

IFPMA Code of Practice (Europe)

 Financial support from company is appropriate for an educational event with a primary purpose of enhancement of medical knowledge

AAM Code of Business Ethics (United States)

 Programs funded are bona fide and quality educational programs and that financial support is not an inducement to prescribe or recommend a particular medicine or course of treatment

Medicines for Europe Code of Conduct (Europe)

 Companies may support scientific, medical, education by funding individual HCPs to attend meetings and conference that educate them in areas relevant to their field

PhRMA Code on Interactions with HCP (United States)

 Financial support from company is appropriate for an educational event with a primary purpose of enhancement of medical knowledge

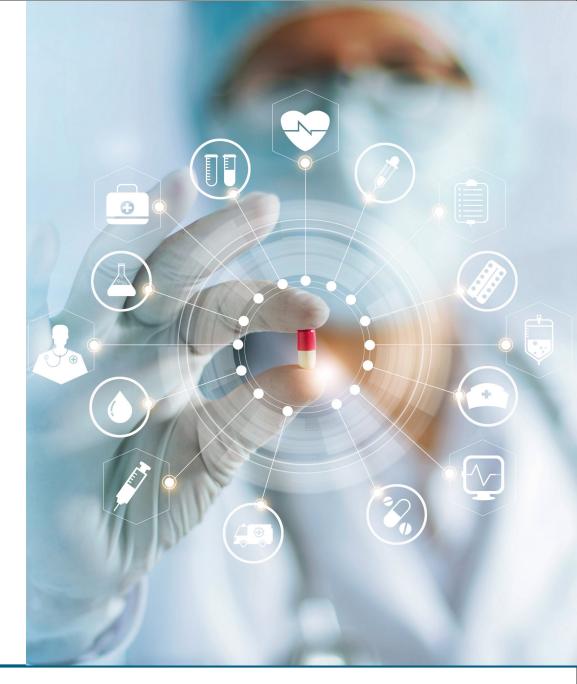


Recommendations

- Continuous learning and enhancing knowledge base is important to facilitate best medical care to their patients. The primary purpose of an educational meeting must be the enhancement of medical knowledge and therefore financial support from companies is appropriate. Such event is conducted through CMEs / RTMs / company conducted product and procedure Training programs. Healthcare practitioners may participate in above programs either as a faculty/Trainer/Proctor or as a delegate / Trainee subject to certain conditions
- Companies support to scientific, medical, pharmaceutical and professional education by funding individual healthcare professionals to attend meetings and conference with a primary purpose of educating them in areas relevant to their field and enhancement of medical knowledge
- Companies should ensure that programs funded are bona fide and quality educational programs and that financial support is not an inducement to prescribe or recommend a particular medicine or course of treatment
- Providing un-restricted educational grants/Stall participation to organizing committees of various State/ National conferences for HCPs education during such conferences. Such events are independently led and organized by respective organizing committees with no involvement from pharmaceutical companies.
- Financial assistance for scholarships or other educational funds to permit medical students, residents, fellows, and other HCPs in training to attend carefully selected educational conferences may be offered, so long as the selection of individuals who will receive the funds is made by the academic or training institution (PhRMA)

Monitoring and Implementation

- Drugs and Cosmetics Act 1940 and Essential Commodities Act, 1955 do not govern interactions between HCPs. While the former regulates sales and marketing whereas the latter governs law for "Essential" commodities.
- UCPMP regulates interaction with HCPs and hence it is suggested to either adopt the UCPMP, with certain modifications, as a law or implement an independent legislature
- A Governing mechanism under DoP to be set up for monitoring violations/non-compliances
- All violations/non-compliances should be treated as a civil offence and in line with global practices, monetary penalties/fines be levied on companies which are found to be in violation/non-compliance. The amount of the penalty should be proportionate to the violation/noncompliance



Thank You

Appendix 1 – Comparison of Global Guidelines (1/10)

	IFPMA Code of Practice (Europe)	Association for Accessible Medicines (AAM) Code of	Medicines for Europe Code of conduct (Europe)	PhRMA Code on interactions with HCP (United States)
		business ethics (United States)		
Educational Items/Brand Reminders	Gifts for the personal benefit of HCPs (either directly or through clinics and institutions) are prohibited. Providing or offering cash, cash equivalents or personal services is also prohibited. Promotional aids of minimal value and quantity may be provided or offered to HCPs solely for the promotion of over-the-counter medicines if relevant to the practice of the HCP.	Gifts for the personal benefit of HCPs are prohibited. Companies may offer to healthcare professionals items designed primarily for the education of patients or healthcare professionals if the items are of modest value and do not have value to healthcare professionals outside of his or her professional responsibilities. Such items should not be offered on more than an occasional basis, even if each individual item is appropriate. Payments in cash or cash equivalents (such as gift certificates) for the personal benefit of healthcare professionals should not be provided or offered to healthcare professionals.	Personal gifts to healthcare professionals such as flowers or chocolates to mark a birthday, festival or national holiday, are prohibited in all countries. Companies may occasionally provide educational materials, inexpensive medical utility items and inexpensive promotional items (for example a pen) to individual healthcare professionals. Companies must not give cash or cash equivalents. Items that could be easily resold or used to generate income are prohibited. Companies must not give cash or cash equivalents. Items that could be easily resold or used to generate income are	Gifts for the personal benefit of HCPs are prohibited. It is appropriate for companies, where permitted by law, to offer items designed primarily for the education of patients or HCPs if the items are not of substantial value (\$100 or less) and do not have value to HCPs outside of their professional responsibilities. For example, an anatomical model for use in an examination room is intended for the education of patients and is therefore appropriate, whereas a laptop may have independent value to a health care professional outside of their professional responsibilities, even if it could also be used to provide education to patients, and therefore is not appropriate.
	Items/Brand	Educational Items/Brand Reminders Clinics and institutions) are prohibited. Providing or offering cash, cash equivalents or personal services is also prohibited. Promotional aids of minimal value and quantity may be provided or offered to HCPs solely for the promotion of over-the-counter medicines if relevant to the practice of	Educational Items/Brand Reminders HCPs (either directly or through clinics and institutions) are prohibited. Providing or offering cash, cash equivalents or personal services is also prohibited. Promotional aids of minimal value and quantity may be provided or offered to HCPs solely for the promotion of over-the-counter medicines if relevant to the practice of the HCP. Payments in cash or cash equivalents (such as gift certificates) for the personal benefit of HCPs are prohibited. Companies may offer to healthcare professionals items designed primarily for the education of patients or healthcare professionals if the items are of modest value and do not have value to healthcare professional responsibilities. Such items should not be offered on more than an occasional basis, even if each individual item is appropriate. Payments in cash or cash equivalents (such as gift certificates) for the personal benefit of healthcare professionals should not be provided	Educational Gifts for the personal benefit of HCPs (either directly or through clinics and institutions) are prohibited. Providing or offering cash, cash equivalents or personal services is also prohibited. Promotional aids of minimal value and quantity may be provided or offered to HCPs solely for the promotion of over-the-counter medicines if relevant to the practice of the HCP. Payments in cash or cash equivalents or the HCP. Butters (United States) Gifts for the personal benefit of HCPs are prohibited. Companies may offer to healthcare professionals such as flowers or chocolates to mark a birthday, festival or national holiday, are prohibited in all countries. Companies may occasionally provide educational materials, inexpensive medical utility items and inexpensive promotional items (for example a pen) to individual healthcare professionals should not be provided or used to generate income are professionals should not be provided or offered to healthcare professionals. Companies must not give cash or cash equivalents. Items that could be cash or cash equivalents. Items that could be or offered to healthcare professionals.

Appendix 1 – Comparison of Global Guidelines (2/10)

#	Activities	IFPMA Code of Practice	Association for Accessible	Medicines for Europe	PhRMA Code on interactions with
		(Europe)	Medicines (AAM) Code of	Code of conduct	HCP (United States)
			business ethics (United States)	(Europe)	
1	Educational Items/Brand Reminders	Items of medical utility may be offered or provided by member companies on occasional basis if such items are of modest value, do not offset routine business practices and are beneficial to enhancing the provision of medical services and patient care. Informational or educational items provided to HCPs for their education or for the education of patients on disease and its treatments may be offered by member companies provided that the items are primarily for educational purposes and do not have independent value.	Providing items for healthcare professionals' use that do not advance disease or treatment education – even if they are practice-related items of minimal value (such as pens, note pads, and similar "reminder" items with Company or product logos) – may foster misperceptions.		Items designed primarily for the education of patients or health care professionals should not be offered on more than an occasional basis, even if each individual item is appropriate. Providing items for health care professionals' use that do not advance disease or treatment education - even if they are practice-related items of minimal value (such as pens, note pads, mugs, and similar "reminder" items with company or product logos) - may foster misperceptions that company interactions with health care professionals are not based on informing them about medical and scientific issues. Payments in cash or cash equivalents (such as gift certificates) should not be offered to health care professionals either directly or indirectly, except as compensation for bona fide services.

Appendix 1 – Comparison of Global Guidelines (3/10)

7	#	Activities	IFPMA Code of Practice	Association for Accessible	Medicines for Europe	PhRMA Code on interactions with
			(Europe)	Medicines (AAM) Code of	Code of conduct	HCP (United States)
				business ethics (United States)	(Europe)	
2		Travel Facilities	No company may organize or sponsor an Event for HCPs (including sponsoring individuals to attend such an Event) that takes place outside of the HCP's country of practice unless it is appropriate and justified to do so from the logistical or security point of view. International scientific events that derive participants	It is appropriate for consultants and speakers (not non-faculty and non-consultant healthcare professional attendees) who provide consulting and speaker arrangement services to be offered reimbursement for reasonable travel. Consulting or advisory arrangements lacking a bona fide business purpose should not be used to justify compensating healthcare professionals for their travel.	Travel should always be on the most direct and logical route, taking into account costs to the company. Arrivals and departures should, whenever logistically possible, coincide with the beginning and end of the meeting. Companies must not fund or	It is appropriate for consultants who provide advisory services to be offered reimbursement for reasonable travel. Token consulting or advisory arrangements should not be used to justify compensating health care professionals for their time or their travel. It is not appropriate to pay travel expenses to nonfaculty and non-consultant health care professional attendees at company-sponsored
			from many countries are therefore, justified and permitted.	nearmeare professionals for their traver.	facilitate stop overs (except where logistically unavoidable), recreation, side trips and trip extensions.	meetings, including attendees who participate in interactive sessions. Financial support should not be offered for the costs of travel of non-faculty health care professionals attending CME or third-party scientific or educational conferences or professional meetings.

Appendix 1 – Comparison of Global Guidelines (4/10)

#	Activities	IFPMA Code of	Association for Accessible	Medicines for Europe	PhRMA Code on
		Practice (Europe)	Medicines (AAM) Code of	Code of conduct (Europe)	interactions with HCP
			business ethics (United States)		(United States)
3	Hospitality	All Events must be held in an appropriate venue that is conducive to the scientific or educational objectives and the purpose of the Event or meeting. Companies must avoid using renowned or extravagant venues. As a general rule, the hospitality provided must not exceed what participants would normally be prepared to pay for themselves.	All Events should be held in an appropriate venue that is conducive to the scientific or educational objectives and the purpose of the Event or meeting. Companies should avoid using extravagant venues or resorts. High-end restaurants are not appropriate venues.	Venues must be appropriate and conducive to the main purpose of the meeting. Appropriate venues may include clinical, laboratory, educational, conference or healthcare settings, or business locations such as business hotels or conference centres. Luxury hotels, resorts, venues known for their entertainment or recreational value, or extravagant venues are never appropriate, regardless of facilities or price. Companies must not offer, fund or facilitate 'plus ones' for any member of the healthcare community or provide such uninvited guests with anything of value, except in those rare instances where a service provider with a disability genuinely requires a carer to enable them to travel. Companies should actively discourage the accompaniment of uninvites guests on company	Venue selected by the company should not be extravagant or the main attraction of the event or perceived as such. Luxury resorts, high-end restaurants, and entertainment, sporting, or other recreational venues or events are not appropriate.

Appendix 1 – Comparison of Global Guidelines (5/10)

s IFPMA Code of Practice	Association for Accessible Medicines	Medicines for Europe	PhRMA Code on
(Europe)	(AAM) Code of business ethics	Code of conduct (Europe)	interactions with HCP
	(United States)		(United States)
consultants and advisors for services such as speaking at and/or chairing meetings and events, involvement in medical/scientific studies, clinical trials or training services, participation at advisory board meetings, and participation in market research where such participation involves	Consulting arrangements with healthcare professionals may allow companies to obtain information or advice from medical experts on such topics as the marketplace, products, therapeutic areas, and the needs of patients. In addition, healthcare professionals participate in Company-sponsored speaking programs in order to help educate and inform other healthcare	experts of the healthcare community to provide necessary services, including: • serving as experts on advisory boards • speaking engagements • participating in research • participating in focus groups or market research	Consulting arrangements with health care professionals allow companies to obtain information or advice from medical experts on such topics as the marketplace, products, therapeutic areas, and the needs of patients. It is appropriate for companies to engage health care professionals to provide bona fide advisory services as long as the number of health care professionals is reasonably necessary to achieve an identified purpose, and the health care professionals are paid compensation that is reasonable and based on fair market value.
	HCPs may be engaged as consultants and advisors for services such as speaking at and/or chairing meetings and events, involvement in medical/scientific studies, clinical trials or training services, participation at advisory board meetings, and participation in market research where such participation involves remuneration subject to certain	(Europe) (AAM) Code of business ethics (United States) HCPs may be engaged as consultants and advisors for services such as speaking at and/or chairing meetings and events, involvement in medical/scientific studies, clinical trials or training services, participation at advisory board meetings, and participation in market research where such participation involves remuneration subject to certain conditions. (AAM) Code of business ethics (United States) Consulting arrangements with healthcare professionals may allow companies to obtain information or advice from medical experts on such topics as the marketplace, products, therapeutic areas, and the needs of patients. In addition, healthcare professionals participate in Company-sponsored speaking programs in order to help educate and inform other healthcare professionals about the benefits, risks, and appropriate uses of medicines. Each company should, individually and independently, cap the total amount of compensation it will pay to an individual HCP in connection with all speaking arrangements. Each Company also should develop policies addressing the appropriate use of speakers, including utilization of speakers after training and the	(Europe) (AAM) Code of business ethics (United States) Code of conduct (Europe) (United States) Consultants and advisors for services such as speaking at and/or chairing meetings and events, involvement in medical/scientific studies, clinical trials or training services, participation at advisory board meetings, and participation in market research where such participation involves remuneration subject to certain conditions. (Europe) (United States) Consulting arrangements with healthcare professionals may allow companies to obtain information or advice from medical experts on such topics as the marketplace, products, therapeutic areas, and the needs of patients. In addition, healthcare professionals participate in Company-sponsored speaking programs in order to help educate and inform other healthcare professionals about the benefits, risks, and appropriate uses of medicines. Each company should, individually and independently, cap the total amount of compensation it will pay to an individual HCP in connection with all speaking arrangements. Each Company also should develop policies addressing the appropriate use of speakers after training and the appropriate use of speakers after training and the appropriate unmber of engagements for any

Appendix 1 – Comparison of Global Guidelines (6/10)

#	Activities	IFPMA Code of	Association for Accessible	Medicines for Europe	PhRMA Code on
		Practice (Europe)	Medicines (AAM) Code of	Code of conduct (Europe)	interactions with HCP
			business ethics (United States)		(United States)
5	Cash or Monetary Grant	Guidelines not included in IFPMA Code of Practice.	Grants, scholarships, subsidies, support, consulting contracts, educational, or practice-related items should not be provided or offered to a healthcare professional in exchange for recommending and prescribing medicines, or otherwise in a manner that would interfere with the ethics and the independence of a healthcare professional's prescribing practices. Companies should have a reasonable expectation that the grant is for the purpose of supporting legitimate education, scientific,	Companies may contribute to the communities they serve by making financial and in-kind donations to healthcare organisations and patient organisations to support healthcare goals. Legitimate purposes include support for: scientific research, medical education, patient education, patient access to healthcare and the overall development of healthcare systems.	
			or medical research.		

Appendix 1 – Comparison of Global Guidelines (7/10)

#	Activities	IFPMA Code of	Association for Accessible	Medicines for Europe	PhRMA Code on
		Practice (Europe)	Medicines (AAM) Code of	Code of conduct (Europe)	interactions with HCP
			business ethics (United States)		(United States)
6	Medical	HCPs may be engaged as	Guidelines not included in Association for	Guidelines not included in Medicines for Europe code of	Guidelines not included in PhRMA Code on
	Research	consultants and advisors for	Accessible Medicines (AAM) Code of business	conduct.	interactions with HCP.
		services such as involvement in	ethics.		
		medical/scientific studies,			
		clinical trials where such			
		participation involves			
		remuneration.			

Appendix 1 – Comparison of Global Guidelines (8/10)

#	Activities	IFPMA Code of	Association for Accessible	Medicines for Europe	PhRMA Code on
	Practice (Europe)		Medicines (AAM) Code of	Code of conduct (Europe)	interactions with HCP
			business ethics (United States)		(United States)
7	Samples	Free samples of a	It is appropriate to provide samples for	Companies may provide medical samples	It is appropriate to provide
		pharmaceutical product may be	patient use in accordance with the	only by exception and on occasional basis,	product samples for patient use in
		supplied to HCPs	Prescription Drug Marketing Act. Samples	in accordance with local legal restrictions on	accordance with the Prescription Drug
		authorized to prescribe that	of medicines supplied at no charge	amounts and frequency.	Marketing Act.
		product in order to enhance	may be provided to healthcare		
		patient care. Samples should	professionals in order to enhance patient	Samples must not be resold by the	
		be marked as such so that they	care. Samples must not be resold or	healthcare professional and the packaging	
		cannot be resold or otherwise	otherwise misused.	must product clearly indicate this. Medical	
		misused. Companies should	Companies should have adequate systems of	samples are not disclosable under this Code.	
		have adequate systems of	control and accountability for samples		
		control and accountability for	provided to healthcare professionals.	Companies must establish and maintain	
		samples provided to HCPs.	Samples should not be used as payment for	appropriate controls for distribution of samples.	
			services, return for favorable treatment, or		
			other inappropriate inducements.		

Appendix 1 – Comparison of Global Guidelines (9/10)

;	# Activities	IFPMA Code of	Association for Accessible	Medicines for Europe	PhRMA Code on
		Practice (Europe)	Medicines (AAM) Code of	Code of conduct (Europe)	interactions with HCP
			business ethics (United States)		(United States)
1	3 Sponsorship	Companies may sponsor	Healthcare professionals participate in	Companies may sponsor meetings, events	Health care professionals may be
		HCPs to attend Events	Company-sponsored speaking programs in	or projects directed at healthcare	engaged by companies as speakers for
		subject to certain conditions.	order to help educate and inform other	professionals that are relevant to the company's	company sponsored speaker programs
			healthcare professionals about the benefits,	therapeutic areas or business interests. The	to help educate and inform other health
			risks, and appropriate uses of medicines.	sponsorship may be direct or indirect.	care professionals.
			It is appropriate for healthcare professionals		
			who participate in programs intended to train	Company sponsorship must not directly or	Health care professionals engaged by
			speakers for Company-sponsored speaker	indirectly fund or subsidise recreational or	the company as speakers also
			programs to be offered reasonable	entertainment activities for delegates.	participate in company-sponsored
			compensation for their time, considering the		speaker training programs.
			value of the type of services provided, and to		
			be offered reimbursement for reasonable		While receptions or meals that are
			travel, lodging, and meal expenses.		modest as judged by local standards
					may be appropriate during company-
			Financial support should not be offered for		sponsored meetings with health care
			the costs of travel, lodging, or other personal		professional commercial consultants,
			expenses of non-faculty healthcare		companies should not provide
			professionals attending CME, either directly		recreational or entertainment events in
			to the individuals participating in the event		conjunction with these meetings.
			or indirectly to the event's sponsor.		

Appendix 1 – Comparison of Global Guidelines (10/10)

7	# Act	tivitie	IFPMA Code of	Association for Accessible	Medicines for Europe	PhRMA Code on interactions with HCP
	S		Practice (Europe)	Medicines (AAM) Code of	Code of conduct (Europe)	(United States)
				business ethics (United States)		
Ş	Sup Con Med	oport for ntinuing dical ncation	Financial support from company is appropriate for an educational event with a primary purpose of enhancement of medical knowledge.	business ethics (United States) Companies should ensure that ensure that programs funded are bona fide and quality educational programs and that financial support is not an inducement to prescribe or	Companies may support scientific, medical, pharmaceutical and professional education by funding individual healthcare professionals to attend meetings	Financial support from company is appropriate for an educational event with a primary purpose of enhancement of medical knowledge. A company should separate its CME grant-making functions from its sales and marketing departments. A company should develop objective criteria for making CME grant decisions to ensure that the program funded by the company is a bona fide educational program and that the financial support is not an inducement to prescribe or recommend a particular medicine or course of treatment. Any financial support should be given to the CME provider, which, in turn, can use the money to reduce the overall CME registration fee for all participants. Financial assistance for scholarships or other educational funds to permit medical students, residents,
						fellows, and other health care professionals in training to attend carefully selected educational conferences may be offered, so long as the selection of individuals who will
						receive the funds is made by the academic or training institution