Code of Conduct

REVIEW 2012

Interfarma
Associação da Indústria Farmacêutica de Pesquisa
Preface

Interfarma’s Code of Conduct has been in effect since July 1, 2012. The document, which we now present with great satisfaction to authorities, society, the medical class and other health professionals, considers the results of an in-depth and detailed revision that began in 2007 and is not finished in this edition. It will always be a continuous process of improvement.

The new text goes beyond that. In a pioneer fashion, it incorporates the terms of an unprecedented understanding that our entity reached with the Federal Council of Medicine signed last February.

Therefore, the provisions, now transformed into rules for the professionals at our 43 affiliated companies, include the most rigorous ethical care, obligations and prohibitions that, in the mutual judgment of the CFM and Interfarma, should clearly and transparently preside over good relationship practices among the medical class, healthcare professionals and the Pharmaceutical Industry.

For us at Interfarma, the Code of Conduct is more than just a text. It is a document that governs our daily practice and our greater commitment with society and with the country: act ethically. Thus, only those companies that respect and follow the Code can become members of our entity. And, in the event of noncompliance with the rules, the Code itself establishes the mechanisms that lead to punishment.

With this initiative, we hope to help patients, doctors, authorities and professionals transform public health and the relations that exist therein in our Country in areas of clarity, transparency, respect for laws and ethics.
Pronouncement by the President of the Federal Council of Medicine – CFM – Dr. Roberto Luiz d´Avila, during the ceremony for signing the term of positioning in defense of good relationship practices between the medical class and the pharmaceutical industry

“From the outset, Interfarma has demonstrated a receptiveness and willingness to construct this document. And if that had not existed, we would not be here now, even if it had been 10 years after my history and two and a half years since I assumed as President of the Council, seeking this understanding.

I think it is a victory for all. It is a victory for society that now moves forward with this transparent relationship with the industry; society now begin to understand and to realize that in reality there is no special treatment and there are no reasons to distrust that medical prescription; that the medical prescription will be filled with total independence, with total belief in the efficacy, in the efficiency of that medication and not soiled by obscure interests of both parties, of doctors and the industry itself.

I believe that above all else it is a victory of society and a victory of the doctors who now also understand this relationship without submitting to gaining any advantage. The professional now has a clear conscience that he is doing what is best for his patient, and on the other hand, I think it is also good for industry. I cannot speak for the industry, but I believe that for the industry these criteria are very clear and that this relationship also is established on a solid and a trusting base, especially one of transparency.”
Preamble

The pharmaceutical industry is constantly renewing its quest for innovations that transform themselves into therapeutic options for the growing challenges in public health, providing dynamism to a sector that continuously recycles its concepts and broadens horizons for patients and healthcare professionals. In line with the legitimate expectations of the Brazilian society, the pharmaceutical industry tries not only to perform its fundamental mission of offering better, more efficient drugs, but also to reinforce its uncompromising defense of ethical principles that give the much needed credibility and transparency to the research, development, distribution, provision, and promotion of drugs in the country.

INTERFARMA’s Associated Companies and those that spontaneously choose to be bound by the terms of this Code of Conduct (hereinafter referred to as “Companies”) acknowledge the importance of free competition, free initiative, and, above all, are committed to managing their activities within ethical standards compatible with the objective of consolidating a Brazilian pharmaceutical market that is aware of its responsibilities towards patients, consumers, physicians, public officials, non-governmental organizations, and all other related professionals.
Index

Definitions ................................................................. 09
Structure of this Code ................................................ 10

Chapter 1
General rules for the pharmaceutical sector .................. 11
Section 1 ........................................................................ 12
Fundamental Principles
Section 2 ........................................................................ 14
Relationship with Public Officials and Government Authorities
Section 3 ........................................................................ 14
Interactions and Relationship with Patient Associations
Section 4 ........................................................................ 16
Adherence to the Code and Enforcement in Healthcare-related Areas
Section 5 ........................................................................ 17
Contracting of Specialized Services in Healthcare
Section 6 ........................................................................ 19
Congresses, Symposiums, Seminars, and Other Events
Section 7 ........................................................................ 23
Promotional Materials
Section 8 ........................................................................ 25
Drug-related Activities at Points of Sales
Section 9 ........................................................................ 26
Communication on New Drugs and Indications not Approved by ANVISA (Off-label)
Section 10 ................................................................. 27
Offer of Gifts

Chapter 2
Rules related to drugs subject to a physician's prescription ...... 29
Section 11 ................................................................. 30
Distribution of Free Samples
Section 12 ................................................................. 31
Visit to Healthcare Professionals
Section 13 ................................................................. 32
Donations and Other Contribution for Healthcare Institutions, Bodies, Associations, and Companies

Chapter 3
Rules related to Over-The-Counter Drugs (OTC) .................. 35
Section 14 ................................................................. 36
Over-The-Counter Drugs (OTC)
Section 15 ................................................................. 38
Direct Contact with Consumers
Chapter 4
Rules for conflict resolution ......................... 39

Section 16 ........................................................................... 40
Application and Effectiveness of Code of Conduct Rules

Section 17 ........................................................................... 41
Ethics Committee

Section 18 ........................................................................... 42
Penalties

Annex
Regulation of the Ethics Committee .............. 45
1. Preliminary provisions ............................................. 46
2. Start of the investigation procedure .............. 47
3. The Ethics Committee ............................................. 48
4. Claim of impediment of a member .............. 50
5. Evidence ................................................................. 51
6. The trial session ......................................................... 52
7. The Decision of the Ethics Committee .......... 54
8. The appeal procedure ............................................. 56
9. Effectiveness of the Decision of the Ethics Committee ............................................. 56
10. Costs ................................................................. 57
11. Confidentiality ....................................................... 57
12. Final provisions ..................................................... 57
Definitions

The following definitions are adopted for the purposes of this Code of Conduct:

**Healthcare Professionals:** Professionals qualified to prescribe or dispense drugs, including physicians, dentists and pharmacists.

**Healthcare-related Professionals:** Persons who may influence the prescription, dispensation or suggestion of drugs, both in the private sector and as public officials, including, but not limited to nurses, physiotherapists, audiologists, biomedicine professionals, pharmacovigilance professionals, students of medicine, pharmacy, nursing, physiotherapy, audiology, drugstore attendants, members of product standardization commissions, employees and agents of public or private hospitals, clinics, and other entities related to patients or healthcare institutions, associations or companies.

**Healthcare Institutions, Bodies, Associations, and Companies:** All those that, directly or indirectly, both in the private sector and as part of the government, take part in healthcare or supporting activities, including those representative of physicians, pharmacists, and patients, regulatory agencies, the Ministry of Health, Departments of Health at state or local levels, or any other private entity or governmental body that purchases drugs.

**Public Official:** Any person who, permanently or temporarily, with or without remuneration, performs the duties of a public position, job or role at any governmental body or entity.

**Promotional Material:** Any material produced by Companies with the purpose of promoting their products and devices, regardless of the media that is used.

**Free Sample:** Any drug distributed to Prescribing Healthcare Professionals without remuneration.
Structure of this Code

With the purpose of better systematizing the rules set forth in this Code, its provisions were divided as follows:

Chapter 1 – General rules for the pharmaceutical sector;

Chapter 2 – Rules related to drugs subject to a physician’s prescription;

Chapter 3 – Rules related to Over-The-Counter Drugs (OTC);

Chapter 4 – Rules for conflict resolution
Chapter 1
General rules for the pharmaceutical sector
Section 1
Fundamental Principles

1.1. The following fundamental principles shall be observed by Companies bound by this Code when promoting their drugs and interacting with Public Officials and Healthcare Institutions, Bodies, Associations, and Companies:

1.1.1. **Relationship Bases:** The relationship with Healthcare Professionals and Healthcare-related Professionals shall be based on an exchange of information that helps a permanent development of healthcare and pharmaceutical care, thus contributing to provide patients with access to increasingly efficient and safe therapies.

1.1.2. **Product Information:** Product information shall be balanced, true, complete, updated, and, when applicable, supported by scientific evidence. The promotion of drugs based on controversial or unsupported information is contrary to this Code’s principles.

1.1.3. **Autonomy of Healthcare Professionals:** Companies bound by this Code shall not, directly or indirectly, offer, promise or give awards, gratuities or advantages of any nature linked to the prescription, use, promotion, recommendation, suggestion or endorsement of drugs. Any action that may be perceived as undue interference on the autonomy of Healthcare Professional or Healthcare-related Professionals shall be promptly interrupted, without prejudice to the possible determination of liability pursuant to the rules of this Code and to the legislation in force.

1.1.4. **Proper Usage of Drugs:** Promotional actions shall have the purpose of divulging the correct and proper indications of a drug.
1.1.5. **Indications not approved by ANVISA (Brazilian Health Surveillance Agency) (Offlabel):** recommendations for the use of drugs that are not in strict correspondence with indications previously approved by Brazilian sanitary authorities are hereby forbidden, except when destined specifically to the spreading of knowledge among the scientific community, as set forth in Section 9 below.

1.1.6. **Transparent Relationships:** Disguised relationships with Healthcare Professionals, Healthcare-related Professionals, Public Officials, and Healthcare Institutions, Bodies, Associations or Companies are not admissible. Actions involving donations to or the hiring of professionals to provide specialized services, assessment, researches or studies shall always be supported by social, scientific or continued education demands that are clearly identifiable and solidly justifiable, being always backed by a written agreement signed by the parties.

1.1.7. **Liability:** INTERFARMA’s Associated Companies and those that agree to be bound by the ethical standards set forth herein are responsible for enforcing the rules of this Code of Conduct in all actions that they perform, directly or indirectly, before Healthcare Professionals, Healthcare-related Professionals, Public Officials, and Healthcare Institutions, Bodies, Associations or Companies. These Companies are also liable for actions taken by third parties, especially distributors and contractors, whenever these take action under their guidance or mandate, pursuant to the law.

1.1.8. **Legislation in Force:** without prejudice to the provisions of this Code, the promotion of drugs and other interaction activities with Public Officials, and Healthcare Institutions, Bodies, Associations or Companies shall be regulated by the laws, decrees, ordinances, resolutions, and rules set forth by the administering authorities on the matter, and the most restrictive rule shall prevail.
Section 2
Relationship with Public Officials and Government Authorities

2.1. The Companies bound by this Code and any of their officers, directors, employees or representatives shall not, directly or indirectly:

2.1.1. Make any offer, promise or authorize payments and/or donations of any amount in money or other items of value to Public Officials or representatives from Healthcare Institutions, Bodies, Associations, and Companies, with the purpose of inducing the beneficiary to take or not to take any action in violation of their legal obligations; and

2.1.2. Take advantage of any offer, promise or authorization of payment and/or donation as a means to obtain and/or retain business and/or undue advantages before government bodies.

Section 3
Interactions and Relationship with Patient Associations

3.1. Companies bound by this Code may interact with Patient Associations and other similar organization with the purpose of raising the population’s awareness of health-related issues and/or of providing the public with proper information on the treatment, prevention, and diagnosis of diseases.
3.2. On their interactions with Patient Associations, the Companies shall ensure that their relationship is clear and transparent, striving so that all their actions are in conformity with the rules set forth in this Code of Conduct.

3.2.1. The Companies shall keep a list of Patient Associations who have received financial support and/or any other indirect/non-financial aid; such list shall contain a brief description of the nature of each project and the corresponding value or benefit, person in charge, scope, term, and other information deemed relevant.

3.3. The Patient Associations shall be entitled to total independence regarding the informative materials developed by them, while the Companies may, upon request, offer technical and scientific information regarding their field of specialization. The Companies may not influence on the development of informative materials by the Patient Associations with the purpose of obtaining commercial advantages for themselves or for their affiliates, subsidiaries, and/or associated companies.

3.4. The following requirements shall be taken into account by Companies supporting Patient Associations:

3.4.1. The support to Patient Associations shall not be conditioned to any retribution to the supporting company other than their institutional promotion, and shall always be backed by a written agreement, regardless of value.

3.4.2. No Company shall request, condition or demand exclusivity in turn for their support to a Patient Association or to any of the latter’s programs.

3.4.3. In respect to the autonomy of Patient Associations, the Companies shall not be responsible for the permanent payment of the Patients Associations administrative expenses, except in exceptional cases, thus considered those of recently established entities in a proven state of need, when the allocation of resources for rent, personnel and routine material payments shall be allowed, as long as for a term no longer than three (3) years.
3.5. Companies bound by this Code shall always refuse requests from Patient Associations and their members for counseling in personal medical issues (i.e., “Is this drug suitable for me?”); however, the provision of general information on their own products is allowed, such as answers to questions about indication and dosage in accordance with the respective sanitary record. In any case, the Company shall advise the patient to seek proper medical guidance.

Section 4
Adherence to the Code and Enforcement in Healthcare-related Areas

4.1. INTERFARMA’s Associated Companies acknowledge self-regulation as the preferential means to solve controversies arisen in the segment represented by them and, for such, grant the required legitimacy to judging bodies and agree to abide by their decisions whenever violations of the rules in force are identified, as set forth in Chapter 4 below.

4.2. This Code’s provisions may also be extended to pharmaceutical companies not associated with INTERFARMA or to stakeholders in areas related to the defense and protection of health, in which case they shall be subject to the rules in force in what applies to them.
Section 5
Contracting of Specialized Services in Healthcare

5.1.
The Companies may hire Healthcare Professionals or Healthcare-related Professionals to provide services compatible with their qualification or specialization area, and may compensate these professionals according to the complexity and importance of their professional services, in addition to expenses, provided they are reasonable, such as transport, accommodation, and food, limited to the period during which the professionals provides their services.

5.2.
The contracting of Healthcare Professionals or Healthcare-related Professionals shall abide by the transparency and ethical principles set forth in this Code, observing the following:

5.2.1. existence of a document proving de agreement between the Parties with a description of the nature of services to be provided and the compensation criteria for such services;

5.2.2. existence of legitimate interest in the contracted services, established clearly and previously identified;

5.2.3. guarantee of unconditional respect for the technical-scientific independence of the hired professional;

5.2.4. presentation of candidate selection criteria compatible with the identified objective, also ensuring that the people in charge of selection have the knowledge necessary to evaluate if the selected professionals meet the previously defined criteria;

5.2.5. a number of hired professionals not higher than that which is reasonably required to meet the identified objective;
5.2.6. relevant records kept by the Company and effective usage of the services provided;

5.2.7. meetings with hired professionals carried out at locations compatible with the type of service to be carried out. The main reason for such meetings shall always be related to the provision of services, while social gatherings shall have a clearly secondary character, considering the time and relevance attributed to them; and

5.2.8. transport, accommodation, and food expenses compatible with the event’s circumstances and preferably paid directly to the travel agent or to the service provider. In case of need to reimburse such expenses to the Healthcare Professional or to the Healthcare-related Professional, which shall happen only in exceptional cases, the Company shall make sure that they are backed by fiscal (or equivalent) documents and that they do not include any expense or payment made in benefit of family members, companions or persons invited by the hired professional.

5.3. The hiring of Healthcare Professionals or Healthcare-related Professionals who perform or have performed the role of Public Officials shall comply with the relevant rules, observing permanent or temporary impediments set forth by legislation.
Section 6
Congresses, Symposia, Seminars, and Other Events

Sponsoring events organized by medical associations or other entities

6.1. The Companies may take part in symposia, congresses, seminars, and other scientific or educational events that aim at providing means of development to Healthcare Professionals or Healthcare-related Professionals.

6.1.1. The acquisition of quotas to participate in congresses, symposia, seminars, and other events shall be by means of written agreements with the company or organizing entity, and shall not be conditioned to any type of interference with the agenda, objectives, location, lecturer selection or other aspects related to the event.

The contracting of Healthcare Professionals or Healthcare-related Professionals to act as lecturers in seminars and other events

6.2. Healthcare Professionals and Healthcare-related Professionals hired to act as lecturers in symposia, congresses, meetings, conferences or any other events shall be entitled to complete autonomy and freedom for formulate their opinions and analyses.

6.3. The Companies shall take action so that, before their presentation begins, the attending audience is properly informed of possible ethical conflicts to which the hired professional may be subject, thus ensuring that the public is able to critically and independently evaluate the reach of the information they are provided.
Participation of Healthcare Professionals or Healthcare-related Professionals in scientific events by invitation of a Company

6.4. The Companies may invite Healthcare Professionals and Healthcare-related Professionals to participate in symposiums, congresses, and other national or international events, whose main purpose is to spread scientific knowledge, by paying – or reimbursing – expenses related exclusively to transport, meals, accommodation, and entry fees charged by the organizing entity.¹

6.5. The Companies shall use objective and plural criteria to identify the invited Healthcare Professionals and Healthcare-related Professionals; invitations based solely on commercial criteria shall not be allowed.

6.6. The following factors indicate that the participation of Healthcare Professionals or Healthcare-related Professionals complied with the ethical principles set forth in this Code:

   6.6.1. the location chosen for the event provides a suitable environment for the development of the proposed scientific and educational topics, with conference rooms and support material for presentations, workshops, and professional meetings. Events in cruise ships or other locations with a primarily touristic appeal that may corrupt the event’s technical-scientific character shall not be allowed;

¹ Payment / reimbursement for fees that refer to the issuance of a passport and/or request for a travel visa for Health Professionals and/or Healthcare related Professionals when invited to participate in international events will not be permitted.
6.6.2. Expenses with transport, meals, and accommodation are limited to the event itself and are related solely to the invited professional, and may be extended to the days immediately before and immediately after the official agenda, in case logistics and transport issues justify such extension. The Companies shall keep a file with all receipts, records, and documents related to the expenses made in name of the invited professional for a time period equivalent to the respective fiscal year. The payment or reimbursement of any expenses by family members, companions or persons invited by the Healthcare Professional or Healthcare-related Professional is expressly forbidden;

6.6.3. Relationship actions destined to Healthcare Professionals or Healthcare-related Professionals shall be modest and secondary to the scientific event, while the payment or reimbursement of any expense related to leisure activities, such as tickets to shows, theatre, presentations, sports events etc. is expressly forbidden, regardless of being linked to the organization of the scientific event;

6.6.4. any support to the participation of Healthcare Professionals and Healthcare-related Professionals in national or international events shall not be conditioned to the prescription, sale or promotion of any type of drug or Company by such professionals;

6.6.5. the invited Healthcare Professionals and Healthcare-related Professionals shall not receive any type of remuneration, directly or indirectly, for the time invested to participate in the event, except when such participation corresponds to services legitimately provided due to a previous contractual obligation.

6.6.6. the offer of amenities by the Company during the events, including, but not limited to lunches and snacks, shall be made in compliance with good conduct, organization, and always compatible with the dignity and respectability of the participating professionals.
Companies as organizers or holders of their own events

6.7.
The Companies may also hold their own events, with the purpose of disclosing new drugs or promoting scientific knowledge among Healthcare Professionals or Healthcare-related Professionals.

6.7.1. events of this nature shall happen at the same country where the organizing or holding Company is headquartered, except is the choice for a foreign country is justifiable by reasons of security or logistics, such as in case of events that gather participants from different countries or secondary events in international congresses.²

6.7.2. scientific events held by the Companies themselves shall be subject to the same legitimacy and transparency requirements set forth in item 6.6 above.

6.8.
INTERFARMA encourages the adoption of measures and organization compatible with the dignity and respectability of the professional class attending events held by it’s the Companies, such as limiting the number of participants at events, previously defining participation criteria, in addition to other measures considered relevant for the occasion.

6.9.
The offer of first-class tickets for Healthcare Professionals or Healthcare-related Professionals for participation in symposiums, congresses, seminars or professional meetings of any nature is not allowed. The prohibition set forth in item 6.9 shall apply to events held by the Companies themselves, by medical associations, by patient associations, academies or any other public or private entities.

². Merely economic issues cannot be considered when choosing the foreign country for hosting an event held by the Company.
Section 7
Promotional Materials

7.1. Promotional Materials produced by the Companies in any format, physical or electronic, shall comply with the following principles:

7.1.1. comply with the legislation in force and with the characteristics registered at ANVISA at the time the material is produced;

7.1.2. be coherent and consistent with the visual, artistic, and copy plan;

7.1.3. present honest, impartial, and balanced data;

7.1.4. charts and illustrations shall properly support the copy they refer to;

7.1.5. medical and scientific information shall be clear, reliable, and updated, while incorrect or ambiguous interpretations shall be avoided.

7.2. All quotes, paraphrases, and medical and scientific information in the material shall be based on reliable sources, such as officially acknowledged literature. Any data taken from scientific publications shall be accompanied by the proper bibliographical reference, with at least the following information: author’s name, article’s title, periodical’s name, publication year, volume number, and page numbers.

7.3. The content of the bibliographical references shall be readily available to Healthcare Professionals, sanitary authorities, and other qualified professionals that request them.

7.4. Third-party rights, especially copyrights, shall be strictly preserved.
7.5. Any adaptation of charts from scientific publications shall be clearly informed (“adapted from”) and strictly express the truthfulness of the study’s information, in addition to the full bibliographical reference.

7.6. Data from in vitro and animal studies shall be identified as such and their results shall not be extended to clinical practice.

7.7. The use of images of children, pregnant women, naked bodies, and persons practicing sports shall be careful and coherent with the characteristics of the promoted drug.

   7.7.1. The use of uniforms from sports teams and/or professional athletes in conjunction with the drug’s brand is not allowed.

7.8. The material’s month and year of production shall be mentioned, including in advertising pieces.

7.9. Comparative advertisement shall comply with the following principles and limits:

   7.9.1. the use of third-party brands without consent of their respective owners is not allowed;

   7.9.2. it shall not configure unfair competition or vilify the image of drugs or brands from other companies;

   7.9.3. it shall not give rise to confusion between competing drugs;

   7.9.4. the comparison shall be technically objective and supported; and

   7.9.5. the comparisons and claims shall be provable and shall be accompanied by supporting references.
7.10.
The comparison of data on adverse reactions or claims on supposed therapeutic superiority of a drug over others are allowed only when strongly supported and duly proved by indexed publications, with mention of the source that supports such statements.

7.11.
Claims of superiority in terms of effectiveness shall be allowed only when there is a statistically relevant difference, and clinical relevance shall also be considered.

Section 8
Drug-related Activities at Points of Sales

8.1.
In order to preserve the consumer’s purchase intent and to respect the prescription, the Companies shall not, directly or indirectly, give, promise or offer benefits and advantages of any nature, including bonuses, to Healthcare Professionals or Healthcare-related Professionals, as well as to the general public.

8.2.
The marketing and advertising of prescription drugs towards non-pharmacist drugstore owners, attendants or other persons unqualified to dispense drugs is not allowed.

8.3.
Relationship actions that do not interfere negatively with the consumer’s freedom of purchase, i.e., adherence programs and interactions aimed at informing Healthcare Professionals or Healthcare-related Professionals, shall not configure violation of the rule set forth in Section 8.
Section 9
Communication on New Drugs and Indications not Approved by ANVISA (Offlabel)

9.1. The Companies shall not promote, market, advertise or sell pharmaceutical products if the conditions associated to such products, including new therapeutic indications or mode of use have not been previously approved by ANVISA.

9.2. The disclosure of information on unregistered, off-label indications or products may only be carried out when related to medical and scientific information at congresses, symposiums or other scientific events and provided that the audience is duly and previously informed that the product has not been registered or that the indication is off-label.

9.3. Clinical studies related to products or indication still unregistered at ANVISA may be handed out to Healthcare Professionals only upon their request.

9.4. In case of international events, i.e., those in which a significant number or lecturers or guests from different countries take part, communications on new, off-label drugs and indications may be carried out according to the approvals at the event’s country or origin or other countries; in this case, it is mandatory to previously warn and inform the Healthcare Professionals that such drug or condition has not been approved at the country where the event is being held. Healthcare Professionals shall also be informed about the country or countries where the mentioned product or indication is already registered and approved for commercialization.
9.5.
The provisions of Section 9 shall not be applied in order to prevent the distribution within the scientific community of relevant information on technological advances, access to results of clinical researches, and new discoveries for the treatment of patients. The disclosure of information on unregistered products shall also be allowed whenever such disclosure is required by law or by a court ruling.

Section 10
Offer of Gifts

10.1.
The Companies bound to this Code of Conduct may offer gifts to Healthcare Professionals, provided the all the following conditions are complied with:

i) the gifts shall be objects related to medical practice and/or strictly educational, such as, but not limited to publications, stand-alone issues of scientific periodicals (except subscriptions), and anatomic models;³

ii) the gifts shall be objects of a merely symbolic value, i.e., objects whose individual value is not higher than one third (1/3) of the national minimum wage at the time of their acquisitions, and may or may not have the Company’s logo; and

iii) the offers of gifts are limited to three (3) events per year for each Healthcare Professional.⁴

³. For the purposes of item 10.1., “i”, the expression “publications” includes, but is not limited to, scientific notebooks and books, encyclopedias and manuals.

Educational material, including, but not limited to, pamphlets, leaflets, folders, posters and other non-personalized printed material with the objective of helping the Health Professional to properly orient the patient, will not be considered gifts, and are therefore excluded from the limits stipulated in item 10.1.

Scientific/educational material delivered in compliance with legal demands will not be computed for purposes of item 10.1.

⁴. For determining compliance with the limitation established in item 10.1 “iii”, the Companies shall demonstrate mechanisms and/or best efforts were employed to control delivery of the gifts to Healthcare Professionals.
10.2.
Products used in the administrative routine of clinics, including, but not limited to pens, pencil holders, and notepads shall not be considered objects related to medical practice and, therefore, shall not be distributed as gifts. The prohibition set forth in this item does not include the offer of pens and notepads used as support material by participants in congresses, seminars or scientific lectures held outside the medical clinic environment.

10.3.
Offers of gifts, advantages or any other items that do not meet the criteria defined above and the legislation in force shall not be made under any circumstance.
Chapter 2

Rules Related to Drugs
Subject to a Physician’s Prescription
Section 11
Distribution of Free Samples

11.1. The distribution of free samples of drugs shall be made exclusively to prescribing professionals and only at clinics, hospitals, and medical and dental clinics.

11.2. The free samples of drugs shall contain at least 50% of the original presentation content registered at ANVISA and traded by the Company, except for antibiotics, which shall be in enough quantity for the patient’s treatment, and for contraceptives, which shall contain 100% of the original presentation content registered at ANVISA and traded by the Company.

11.3. Offering samples to prescribing professionals in exchange for the prescription or suggestion of products is not allowed.

11.4. The distribution of free samples of vaccines, magistral preparations, and biological products that require special care for their conservation and transport, according to their registration at ANVISA, shall not be allowed.

11.5. For two (2) years after the expiration date of the lot of free samples, the Companies shall keep a file with all documents related to the production, distribution, and pharmacovigilance of free samples, containing at least the following information:

a. Record of drugs handed out to prescribing professionals as free samples;

b. Lot number of the distributed free samples, with nominal identification and record number at the respective councils of professionals who received such free samples;

c. Invoice with a description of the free samples’ presentation, including the lot number;
Section 12
Visit to Healthcare Professionals

12.1.
The activities of Company representatives shall be guided by the highest ethical and professional standards, and their main purposes shall be to:

a. inform Healthcare Professionals on their products’ advantages and risks;

b. promote products according to the usage approved by local regulatory authorities, providing all scientific evidence related to the drugs, supported by the respective studies; and

c. gather information from Healthcare Professionals on the acceptance of products and possible adverse effects that may have been recorded.

12.2.
Company representatives shall provide Healthcare Professionals with precise and complete information on drugs, always limited to the drug information and characteristics registered at ANVISA.

12.3.
Healthcare Professionals shall not be offered incentives of any nature in exchange for the prescription, suggestion, influence on the purchase decision or on the administration of products.

5. INTERFARMA does not agree with any sort of promise or authorization for payment and/or donation, as an instrument to permit access to professionals at Companies bound by this Code to offices, first aid clinics, medical centers, hospitals and/or any other public or private health center.
12.4.
Buying meals to Healthcare Professionals is allowed when the purpose is to discuss or exchange scientific or educational information; the values shall be modest and the location suitable for the exchange of information. The Company’s representative shall be present throughout the entire meeting.

12.5.
Buying meals or paying for any other expenses of companions is not allowed.

12.6.
There shall not be promotional actions for drugs directed towards students of medicine, pharmacy and dentistry still not qualified for prescription, in compliance with the professional statute in force.

12.6.1. The handing out of scientific material to medical students shall be carried out only during medical events and shall always be related to the main purpose of disclosing and sharing relevant information for the improvement of continued education in medicine.

Section 13
Donations and Other Contribution for Healthcare Institutions, Bodies, Associations, and Companies

13.1.
Donations and other forms of contribution (“Contributions”) destined for Healthcare Institutions, Bodies, Associations, and Companies shall be due to a legitimate interest and always aimed at meeting the actual needs of the assisted community or society.

13.2.
Donations and contributions shall always be backed by a written document containing at least their value, date, purpose, and possible charges.
13.3.
The Companies shall not use philanthropic donations and/or contributions as commercial instruments or as product marketing strategies.

13.4.
Donations and contributions destined to Healthcare Institutions, Bodies, Associations, and Companies shall be made only to formally established corporate entities, with the purpose of promoting educational actions knowingly important for the wellbeing of the assisted community or society, and shall not be used as a means to hold parties, fraternizations or other entertainment events with no scientific and/or educational purpose.

13.5.
The Contributions shall not be used as an instrument to obtain or retain business, with the purpose of obtaining undue advantages, or be linked to retributions such as the suggestion, recommendation or purchase of a Company’s products. Institutional promotion shall be the only retribution allowed for Contributions provided by Companies.

13.6.
The Companies shall ensure that the receivers of their Contributions have sustainability mechanisms that allow their existence regardless of Contributions.
Chapter 3
Rules Related to Over-The-Counter Drugs (OTC)
Section 14
Over-The-Counter Drugs (OTC)

14.1.
In addition to the provisions herewith and in the legislation in force, the advertising or promotion of Over-The-Counter Drugs (OTC) shall comply with the following:

a) the consumer’s benefit and safety shall always guide any advertising initiative;
b) the respect for consumers and Healthcare Professionals shall be the main basis of promotional actions;
c) its main aim shall be to properly inform the consumers and Healthcare Professionals; and
d) the promotional pieces shall highlight that the promoted products are drug, in order to prevent any confusion with other freely consumable products.

14.2.
There shall not be the use of names, images and/or voices from persons unqualified in medicine or pharmacy, whose characteristics are easily recognizable by the public due to their celebrity, to endorse, recommend or suggest the use of Over-The-Counter Drugs (OTC), and neither the use of language that directly or indirectly relates the use of drugs to physical, aesthetic, intellectual or psychological improvement, except when such benefits can be proved.
14.3. The promotion or advertising of Over-The-Counter Drugs:

14.3.1. shall not induce consumers to error regarding the product’s content, package size, appearance, uses, rate of relief or actions;

14.3.2. any reference to scientific or consumer studies shall always be based on properly carried out and correctly interpreted researches, and the results or conclusions presented to the consumer shall be provable;

14.3.3. shall not suggest the cure or prevention of any disease that requires treatment under supervision of a Healthcare Professional;

14.3.4. shall not induce consumers to unnecessary use of drugs;

14.3.5. shall not induce children or teenagers to the use of the products;

14.3.6. shall not induce consumers to fear or concern that they are suffering or might suffer from any serious disease;

14.3.7. shall not make any offer to return paid money or other benefit of any nature in case consumers are unsatisfied after purchasing a drug;

14.3.8. shall not contain any statement or presentation of any nature that may be considered obscene, repulsive, rude or prejudicial in terms of race, gender, sexual preference, belief, social or intellectual status, and shall not inspire violence or spread superstition; and

14.3.9. shall not use messages, symbols, items, and images destined to encourage the consumption of products by children or teenagers, and neither shall use playful resources, such as games, toys, and dolls, for promotion purposes.
Section 15
Direct Contact with Consumers

15.1.
Relationships with Consumers shall be kept through service centrals, websites, chats, social networks or any other means of interaction, while Companies shall comply with the following restrictions:

15.1.1. there shall not be suggestions of substitute or similar products for discontinued or untraded products;

15.1.2. services exclusive of Healthcare Professionals shall not be provided;

15.1.3. there shall not be any justification, denial or confirmation or the treatment or conduct of Healthcare Professionals, while the return to Healthcare Professionals shall always be recommended; and

15.1.4. any medical data not mentioned in drug labels shall not be disclosed.

15.2.
General information on the prevention of diseases, healthy habits, and general health, when not promotional, may be disclosed to the general public through consumer service centrals or any other means of interactions.

15.3.
The contact with Consumers, when made by legally qualified Healthcare Professionals or Healthcare-related Professionals, shall comply with the rules related to their professional category.
Chapter 4

Rules for Conflict Resolution
Section 16
Application and Effectiveness of Code of Conduct Rules

16.1.
INTERFARMA encourages Companies and any other interested persons or institutions to present reasoned complaints against actions that may represent violations of the rules set forth in this Code.

16.2.
Complaints presented by any interested Company, person or institution shall be received by INTERFARMA for analysis of their consistency and possible investigation procedure. Once the complaint is admitted and the investigation procedure is opened, it shall not be withdrawn, and the Ethics Committee shall be responsible for processing the complaint, aiming at enforcing the applicable penalties.

16.3.
INTERFARMA shall not investigate anonymous complaints or complaints that do not have enough elements to allow the complainant to be properly identified.

16.3.1. Without prejudice to the above provision, the complainant may, in case of individuals and with a justifiable reason, request that their identity is kept secret from the Parties and persons involved in the complaint, which shall be decided solely by INTERFARMA’s CEO during the admission analysis.

16.4.
INTERFARMA shall only process complaints related to facts that have happened no longer than one (1) year before the complaint is received by INTERFARMA. Complaints filed after such deadline shall be immediately archived, without possibility of appeal.
Section 17
Ethics Committee

17.1.
The Ethics Committee shall be fully independent in regards to its prerogative to zeal for strict compliance with the dispositions in this Code of Conduct by the Companies.

17.2.
The members of the Ethics Committee shall apply sanctions corresponding to each case, in accordance with the highest standards of justice and equity, considering:

a. the seriousness of the violation;
b. the advantage obtained or intended by the violator;
c. completion or not of the violation;
d. the seriousness of damage, or risk of damage, to Companies, Consumers or third parties;
e. negative effects in the pharmaceutical market;
f. aggravating or mitigating circumstances, as defined in item 18.5 below; and
g. the financial power of the violating Company, based on its gross sales during the last year, excluding taxes.

17.3.
The conditions to the constitution and operation of the Ethics Committee shall be defined in its own regulations, which shall be an integral part of this Code of Conduct.

17.4.
INTERFARMA shall make its best efforts so that the processing and judging of complaints is carried out in less than ninety (90) days, except for cases whose circumstances and/or complexity justify a longer deadline.
Section 18
Penalties

18.1.
The penalties defined in Section 18 are not progressive, and it is the role of the Ethics Committee to enforce the measure necessary to ensure proper punishment to a violation, within standards consistent with the case’s circumstances.

18.2.
Without prejudice to the immediate interruption of the undue conduct, the Company that violates the rules in this Code of Conduct shall be subject to one of the following penalties:

18.2.1. Suspension of the Associated Company’s social rights before INTERFARMA for up to one hundred and eighty (180) days, without right to suspend associative contributions;

18.2.2. Exclusion of the Associated Company’s membership before INTERFARMA;

18.2.3. A fine to be defined according to the violation’s seriousness, taking into account possible mitigating and aggravating circumstances, according to the following classification:

a. Minor violations: from five thousand Brazilian Reais (R$ 5,000.00) to eighty two thousand and five hundred Brazilian Reais (R$ 82,500.00).

b. Serious violations: from eighty two thousand and five hundred Brazilian Reais (R$ 82,500.00) to twenty two hundred thousand Brazilian Reais (R$ 220,000.00).

c. Very serious violations: from twenty two hundred thousand Brazilian Reais (R$ 220,000.00) to one million, six hundred and fifty thousand Brazilian Reais (R$ 1,650,000.00).
18.3. The penalties set forth in items 18.2.1 and 18.2.2 shall be applicable only to Companies that, at the time the penalty is applied, are bound to this Code of Conduct as one of INTERFARMA’s Associated Companies.

18.4. The amount paid by the Company as a fine shall be directly reverted to social welfare organizations named by INTERFARMA. The donation, made in cash or converted in assets of equivalent value, shall be punitive and shall not be included by the violating Company in its balance sheet.

18.5. The following shall be considered to determine the violation’s seriousness and the amount to be paid as a fine:

18.5.1. Mitigating circumstances:
   a. violator’s good faith;
   b. the violator’s action was not essential for the event;
   c. the violator, by their own will, immediately tries to repair or reduce the consequences of the violation they are charged with; and
   d. the violator has no previous record.

18.5.2. Aggravating circumstances:
   a. the violator is recidivist; i.e., was found guilty by the Ethics Committee in the last three (3) years, as of the publication of the last penalty, regardless of the violation’s nature;
   b. the violation had damaging consequences to public health;
   c. if, being aware of the violation to this Code, the violator does not take measures to prevent it; and
   d. the violator acted with deliberation, recklessness, fraud or bad faith.
18.6.
If both mitigating and aggravating circumstances are present, the penalty shall be enforced considering those that are more relevant.

18.7.
INTERFARMA shall publish regularly on its website a report with information on the activities of the Ethics Committee while investigating complaints of violations to this Code of Conduct.
Annex

Regulation of the Ethics Committee
1. Preliminary provisions

1.1. Any issues of violation to the Code shall be subject to the investigation procedure by the Ethics Committee.

1.2. Conflict resolution by the Ethics Committee shall be limited solely to the judging and enforcement of penalties set forth in the Code.

1.3. The Ethics Committee’s meetings shall be held at INTERFARMA’s headquarters or at another location previously defined by INTERFARMA, observing the meeting schedule defined by the Committee’s appointed members.

1.4. All documents, petitions and written communications shall be presented in a number of counterparts corresponding to the number of members appointed to resolve the conflict, in addition to one counterpart for INTERFARMA and another for the accused Company.

1.5. Communications shall be sent to the address in INTERFARMA’s records – which shall be constantly updated – and by any means that proves submission and receipt, such as, but not limited to, e-mail, registered mail, fax or telegram.

1.6. The deadlines set forth in this Regulation shall be counted in calendar days, shall start on the first business day after the receipt of communications, and shall include the expiration day. If the expiration day is a holiday, the deadline shall be extended to the next business day, whether at the location of INTERFARMA’s headquarters or at those of any Company involved in the complaint.
2. Start of the investigation procedure

2.1. Those who wish to file a complaint shall communicate such intent to INTERFARMA – the “Communication” –, which shall verify if the information provided are formally and materially consistent enough to allow the investigation procedure to start.

2.2. The following requirements shall be met in order for a complaint to be considered formally consistent:

   2.2.1. identification of the complainant and of the accused Company;
   2.2.2. brief account of the supposed violation(s) to the Code, with relevant supporting documentation.

2.3. The complaint’s material consistency shall consist in a preliminary examination, by INTERFARMA’S CEO, of the truthfulness of the facts and that the issue is actually related to the Code of Conduct.

2.4. In case the complaint is considered formally and materially consistent, INTERFARMA shall start the investigation procedure by sending a Communication to the notified Company regarding the conduct mentioned in the complaint, with a deadline of fifteen (15) days to submit a statement.

2.5. In case the complaint is considered inconsistent, whether formally or materially, INTERFARMA shall report to the complainant its reasoned decision and archive the complaint, which shall automatically end the procedure, without possibility of appeal. A complaint archived by INTERFARMA’s CEO may be filed again by any interested party, provided that the formal or material defects that justified its archiving are remedied.
2.6.
Once the complaint is admitted, INTERFARMA shall not end the investigation procedure due to refusal or non-appearance of any party.

3. The Ethics Committee

3.1.
The Ethics Committee is the collegial body responsible for judging complaints filed before INTERFARMA, being composed of representatives appointed by Companies and outside professionals with proven experience, unblemished reputation and outstanding knowledge of practices of the pharmaceutical industry.

3.2.
The Ethics Committee shall be an ad hoc body, meeting always with the specific purpose of debating the case(s) included in the day’s agenda. Once the debates included in the agenda are concluded, the Committee’s members shall be excused from their roles in the Ethics Committee, but may be called upon in the future to debate new complaints of violations to the Code of Conduct.

3.3.
In order to form the ad hoc Ethics Committee, INTERFARMA shall randomly choose its members so that in a number that meets the quorum required for the Originating Chamber or the Appellate Chamber, according to the jurisdiction and the profile of their respective members, observing the following parameters.

3.3.1. The Originating Chamber shall comprise up to six (6) members, of which:
• four (4) members shall be randomly chosen among the members appointed by Companies; and
• two (2) members shall be randomly chosen among the outside professionals appointed by INTERFARMA.
3.3.2. The Appellate Chamber shall comprise up to ten (10) members, of which:

- seven (7) members shall be randomly chosen among the members appointed by Companies; and
- three (3) members shall be randomly chosen among the outside professionals appointed by INTERFARMA.

3.4.
Without prejudice to the above dispositions, the Ethics Committee may debate without the full composition of its judging bodies, as long as there is a minimum quorum of:

- three (3) members for the Originating Chamber, of which at least two (2) shall have been appointed by Companies; and
- five (5) members for the Appellate Chamber, of which at least three (3) shall have been appointed by Companies.

3.5.
In case a member cannot participate in a trial session, they should notify INTERFARMA at least forty eight (48) hours in advance, as of their calling, so that a substitute may be appointed. If the minimum quorum for debates set forth in item 3.4 above, INTERFARMA may, at its discretion, opt not to choose a substitute member.

3.6.
In case it is not possible to reach the minimum quorum for debates, the session shall be postponed and reschedule as soon as possible, while new members shall be randomly chosen to replace the members disqualified from their roles within the Ethics Committee.

3.7.
The members who participate in the debates in the first stage shall be disqualified to take part in the session called to decide the same case in stage of appeal.
3.8. The members shall sign the Term of Independence, Impartiality, and Secrecy, and shall deliver the signed document to INTERFARMA up to the date of the trial session.

3.9. INTERFARMA’s CEO may determine the permanent replacement of any member who fails to meet the deadlines and rules set forth in this Regulation.

4. Claim of impediment of a member

4.1. Those who wish to claim the impediment of a member due to lack of independence or any other reason shall do so before INTERFARMA, within two (2) business days as of the moment when they become aware of facts or circumstances that support such claim.

4.2. Such claim of impediment shall be addressed to the members of the Ethics Committee assigned to analyze the specific case, by means of a reasoned petition and with the relevant evidence. There shall be no appeal against a decision of the Ethics Committee that determines the substitution of maintenance of a Member whose impediment has been claimed.
4.3. Members may be replaced if:

4.3.1. they cannot perform their role;

4.3.2. they are no longer part of the Company that appointed them to perform such a role;

4.3.3. they are directly or indirectly linked to a Company that competes with any party in the dispute, including the fact that their company has a competing product in the class of the product mentioned in the complaint; or

4.3.4. they are in any of the situations set forth in the Term of Independence, Impartiality, and Secrecy.

4.4. Without prejudice to the above dispositions, the person called to be part of the Ethics Committee shall always be encouraged to spontaneously disclose any fact that may give cause to a justifiable doubt on their impartiality and independence.

5. Evidence

5.1. Those that make a claim shall bear the burden of proof to support their arguments. The Ethics Committee, at its discretion, may also request that the parties involved in the issue provide additional evidence considered necessary or appropriate, in which case a deadline compatible with their complexity shall be established.

5.2. If the Ethics Committee requests or allows new evidence to be added to the original complaint, the other party shall be notified to file a statement on the new documents within a maximum of five (5) days.
5.3. If a party duly called to provide evidence or to take any other measure fails to do so within the deadline set forth by the Ethics Committee without providing a reason for such, the Ethics Committee may decide based on the evidence already provided.

5.4. The Ethics Committee may consult technical experts on specific issues related to the complaint, or request that expert evidence is provided, whenever it deems this is in the interest of a better decision on the issue. If a technical opinion or expert evidence is requested, the parties shall have a joint deadline of five (5) days to present their questions and appoint technical assistants.

5.5. The delivery of classified material shall be subject to a specific decision by the Ethics Committee in regards to its convenience and opportunity.

6. The trial session

6.1. The trial session shall be held preferably at INTERFARMA’s headquarters, except if INTERFARMA, in agreement with the parties, decides differently. Changes in the location assigned for the trial session shall be previously reported to the parties.

6.2. The trial session shall start on the assigned date; the Ethics Committee, the Originating Chamber, and the Appellate Chamber shall be formed, depending on the case, observing the minimum quorum for debates.
6.3.
The Ethics Committee shall appoint the Chairperson, with powers to lead the procedure as set forth in this Regulation. The Chairperson shall also have the deciding vote if the members are not able to reach a majority decision on the analyzed issue.

6.4.
Once the session starts, the parties’ representative shall be requested to call up to two (2) witnesses, at their discretion. The witnesses shall be heard by up to fifteen (15) minutes each, answering the questions they are asked by the parties and by the Ethics Committee. The Chairperson shall act with the necessary prudence to respect the time destined to hearing each witness and the preference in asking questions.

6.5.
After the witnesses have been heard, the parties’ representatives shall be invited to verbal pleadings of up to ten (10) minutes each, first the complainant, or INTERFARMA’s representative in the Committee on behalf of the complainant, in case they have formally requested their identity to be kept secret, and then the accused Company.

6.6.
Except for witness evidence, any other evidence shall only be presented during the trial session under exceptional circumstances, to the discretion of the Ethics Committee, observing the existence of circumstances that justify this. If new evidence is admitted during the trial session, those against whom the evidence is presented shall request the session to be suspended for analysis of the evidence, with five (5) days to provide a statement. The suspended session shall be restarted from the point of interruption, and the Chairperson shall determine a new date within ten (10) days.

6.7.
Personal depositions and the hearing of witnesses may be carried out by videoconference or by other means that use data, image, and voice communication technology.
6.8. The absence of any party shall not prevent the Ethics Committee from deciding the issue.

6.9. Once the finding of facts is completed, the Ethics Committee shall decide the question by simple majority, always based on accounts, evidence, and documents in the file. If there is no majority agreement, the Chairperson’s vote shall prevail.

6.10. Members who vote against the majority may, at their discretion, state their votes separately.

6.11. The decision made by the Ethics Committee shall be submitted to INTERFARMA by the Chairperson of the Committee during that trial session. INTERFARMA shall notify the parties of the decision on the business day after receipt, by sending a counterpart by mail or any other means of communication, with proof of receipt, or event by directly delivering it to the parties, upon a receipt.

7. The Decision of the Ethics Committee

7.1. The decision made by the Ethics Committee shall include:

7.1.1. the abstract report, containing the names of the complainant and of the accused, as well as a summary of the issue;

7.1.2. the decision’s reasons, analyzing factual and legal issues;

7.1.3. the votes, the decision and the provisions based on which the members resolved the issues that have been submitted;

7.1.4. the deadline for compliance with the decision and, if applicable, the condi-
tions for the accused Company to prove compliance with the penalty enforced;
7.1.5. signature of the members, of the parties’ representatives, and of two witnesses;
7.1.6. the decision’s date and location.

7.2.
In case any of the members or of the parties’ representatives cannot or does not wish to
sign the decision made by the Ethics Committee, the Chairperson shall certify such fact.

7.3.
The costs and expenses of the investigation procedure will be paid by the party that
gives rise to it, i.e., the claimant, if the claim is declared unfounded, or the accused, if
the claim is declared founded.

7.4.
Within five (5) days from the receipt of notification or from the personal knowledge of
the decision made by the Ethics Committee, the interested party, in light of the commu-
nication to the other party, may request that:

7.4.1. the Ethics Committee correct any material error possibly found in the decision;
7.4.2. the Ethics Committee clarify any obscurity or contradiction in the decision, or
to make a statement on an omitted issue which they should have decided.

7.5.
In the case mentioned in item 7.4 above, the Ethics Committee may hear the other
interested party on the arguments provided, within five (5) days. Once the other party
has been heard or, if deemed irrelevant, once the petition has been received, the Ethics
Committee shall decide the request within ten (10) days, amending the decision if the
request is founded.
8. The appeal procedure

8.1.
There may be an appeal against a non-unanimous decision made by the Originating Chamber of the Ethics Committee. The appeal shall be addressed to the Ethics Committee, to the care of INTERFARMA’s CEO, who shall take the measures required to open the Appellate Chamber that shall decide the issue.

8.2.
The deadline for appeals shall be ten (10) days as of the awareness of the decision made by the Originating Chamber, or of the decision on a request for review due to error, obscurity or contradiction, if one has been filed.

8.3.
The deadlines and procedures to open the Appellate Chamber shall be the same as for the Originating Chamber, especially in regards to the conditions for operation of the Appellate Chamber, for the claim of impediment of a Member, and for the procedures for the trial session.

9. Effectiveness of the Decision of the Ethics Committee

9.1.
The decision made by the Ethics Committee binds the parties and their successors, being converted, when applicable, in written evidence to support future substantive actions or other legal actions.
10. Costs

10.1.
The parties may be called to pay the amounts determined by INTERFARMA as costs before the start of the conduct investigation procedure.

11. Confidentiality

11.1.
Except when otherwise agreed or required by law, the Committee’s members shall keep the confidentiality of issues related to the arbitration. The confidentiality commitment shall also be excused in regards to already public information or information that has somehow been disclosed before being transmitted to the members.

11.2.
INTERFARMA may disclose excerpts of the decision of the Ethics Committee on its website or other means at its discretion.

11.3.
INTERFARMA shall be responsible for keeping the materials and documents it receives during the procedure for three (3) years, as of the archiving of the procedure. After this term, they shall be destroyed.

12. Final provisions

12.1.
INTERFARMA shall not be liable for any fact, action or omission of any nature related to actions taken by the Ethics Committee, except when there is proof of deliberation or bad faith in regards to the actions that are relevant to it.
Interfarma’s Associates
Allegations regarding a violation of the Code of Conduct may be sent by email to: comitedeetica@interfarma.org.br or by mail to: Rua Verbo Divino, 1.488 7º andar Cj 7A – CEP 04719-904 – Chácara Santo Antonio – São Paulo – SP