

IFPMA Note for Guidance on sponsorship of events and meetings

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The <u>Ethos</u> of the International Federation of Pharmaceutical Manufacturers and Associations (IFPMA) is centered on trust to "act with integrity and honesty to improve patient care and build trust with those we serve and to respect the independence of healthcare providers, patients and other stakeholders."

A key principle of the Ethos is Education, recognizing that providing Healthcare Professionals (HCPs) with education and opportunities for scientific exchange is critical in ensuring that HCPs obtain the latest and most accurate information and insights on therapeutic areas and related interventions to improve patient care and enhance the healthcare system overall.

In line with IFPMA's Ethos and our social responsibility, member companies are committed to furthering access to quality education for qualified HCPs through (1) company-organized programs ("Company Programs") and (2) support for third party symposia, congresses and other scientific or professional meetings ("Third Party Events") through event funding and support for HCP attendance. For purposes of this Guidance, Company Programs are defined as scientific meetings addressing human health and disease-specific learning needs for which ownership, accountability and funding belong to a company. Company-driven product-specific educational activities which promote medicinal products (e.g., detailing, speaker programs) are out of scope of this guidance.

The IFPMA Code of Practice (Article 7) sets global standards for industry support for Company Programs and Third-Party Events. The purpose of this Guidance is to provide good practice considerations to IFPMA members in ensuring that these educational opportunities are supported only for their stated purpose and never to unduly influence HCPs. It must be read with the spirit of the IFPMA Code in mind and always in accordance with applicable laws and regulations and other applicable industry codes. Where national or regional codes provide conflicting or stricter requirements, those must be followed.

Key principles

Quality educational/scientific events

The purpose and focus of Company Programs and Third-Party Events for HCPs organized or sponsored by member companies should be to provide scientific or educational information and/or inform HCPs about therapeutic areas, interventions and products for the enhancement of patient care.

Questions to consider in assessing the quality and appropriateness of Company Programs and Third-Party Events include:

- Does the program meet clearly identified educational needs?
- Is the program content adapted to the target audience, and relevant in light of those educational needs?

- Are the program content and associated materials aligned with local laws, regulations, industry code(s) and other relevant standards?
- Is there a sufficiently robust and transparent scientific agenda, with a clear focus on education and scientific exchange?
- Does the agenda exclude inappropriate hospitality or entertainment?

Legitimate support for HCP attendance

Support of HCP attendance by member companies should be based on the relevance of the Company Program or Third-Party Event for individual HCPs depending on their expertise, qualifications, experience, and educational needs. Due consideration should also be given to whether the individual support furthers the industry's commitment to access to quality education.

Support to attend Company Programs and Third-Party Events cannot be conditioned on or offered as a reward for prescription, recommendation, purchase, supply, administration or promotion of any pharmaceutical product or therapies.

Where HCPs are being selected for attendance at a Company Program or Third-Party Event by member companies directly, questions member companies can consider in evaluating that selection include:

- Are the HCP's specialty, expertise, knowledge, experience, and areas of scientific or medical interest directly related to the meeting's purpose, content and agenda?
- Will the meeting's content increase the HCP's medical, scientific or clinical knowledge allowing an enhanced quality of care provided to patients?
- For international Company Programs or Third-Party Events, does the HCP have sufficient proficiency in the official language(s) of the Program or Event?
- Would the support provide an opportunity for scientific education and exchange that might otherwise not be available to the HCP (e.g., due to financial or other constraints, scarcity of local educational opportunities)?
- Is the geographic location of the meeting reasonable for the specific HCP in light of the agenda and other available educational opportunities that might require no/less travel?

In all instances, decisions to support HCPs' attendance at Third-Party Events must be independent of sales considerations. Companies should consider added scrutiny for international Third-Party Events, e.g. review and/or approval by appropriate roles or functions not incentivized by sales.

Where feasible and appropriate in line with educational objectives, member companies should consider supporting virtual attendance for HCPs who will not be speakers, consultants, poster presenters or who will not otherwise have an "active" role at the Company Program or Third-Party Event. Virtual attendance does not need to be prioritized for HCPs with "active" roles.

Company support can include only registration fees, travel, accommodation and meals for the duration of the Company Program or Third Party Event, and these must reflect fair market value and comply with any local thresholds. Where possible these costs should be paid directly to the service provider (e.g., travel company, third-party meeting organizer), with no direct travel and expense reimbursement to HCPs. Where HCPs are reimbursed for costs paid upfront, these must be supported by appropriate documentation/justification.

Except in cases of medical necessity, no costs associated with individuals accompanying invited HCPs can be paid by member companies.

Member associations and member companies and/or their local affiliates should consider establishing appropriate governance to ensure relevance and reasonableness of support, and to minimize the risk of real or perceived undue influence.

Conducive locations & venues

Companies should only organize or sponsor Company Programs and Third-Party Events in or near HCPs' country of practice and should generally aim to minimize travel for attendees, unless logistics or security considerations require another location. For example, international Third-Party Events deriving participants from many countries are justified and appropriate. The program for an event may justify a particular location if there are valid and legitimate reasons for that location such as the availability of relevant expertise or research facilities.

The location should not be the main attraction of the event, should not be exclusively known for its touristic, cultural or recreational offering and should not be selected to coincide with any recognized sporting or cultural events taking place in the same location and time. In case of exceptions, it should be demonstrated and documented that the timing of the event does not create an inappropriate attraction, and that the location is otherwise appropriate for scientific and educational meetings. The location should generally be in or near a city or town which is a scientific or business center conducive to the exchange of ideas and the transmission of knowledge. Examples of inappropriate locations could include ski-centers, beach resorts during associated holiday seasons, or a city hosting a major event at the same time as the event.

The appropriateness of a location may be assessed differently for strictly local events attended by local HCPs as opposed to regional or international events. Destination assessments should take into consideration – among other criteria – where participants are coming from to ensure easy access and overall efficient travel arrangements. Hence, an approval for a specific destination might be favorable for a local event but not for a regional or global one.

Venues must be conducive to the scientific or educational objectives and the purpose of the Company Program or Third-Party Event. This requires that:

- The venue provides safe and secure meeting facilities;
- The venue has the necessary business and technical facilities to accommodate the meeting and its participants; and
- The meeting facilities are accessible only to intended audiences, with due consideration to privacy.

Extravagant venues must be avoided, even where the cost might be low compared to other venues. If a venue is renowned for its entertainment, sports, or other leisure activities, and companies still choose to proceed with sponsorship, companies must be able to compellingly demonstrate and document that it nevertheless remains appropriate for scientific and educational meetings. In their assessment, companies should always consider how the public, media and/or authorities may perceive the venue, including whether it could be viewed as a solely luxury, touristic, holiday and/or entertainment facility.

Reasonable hospitality

Hospitality should be modest, incidental and reasonable based on meeting duration, limited to reasonable hotel accommodation and meals (e.g., coffee breaks, lunches, conference dinners, welcome reception).

Refreshments and/or meals incidental to the main purpose of the Company Program or Third-Party Event can be provided to participants; hospitality cannot be offered to, arranged for, or paid for non-event participants. These must be moderate and reasonable as judged by local standards and should be set by local industry associations and/or companies.

Members companies may not organize or cover the costs of entertainment or other leisure or social activities, nor should they sponsor HCP participation in such activities.

There may be circumstances where independent third-party organized events provide opportunities for social, sporting and/or leisure activities alongside the program. These should be outside of the scientific schedule and not interfere with the overall scientific content of the program. Any such activities should be subject to a separate fee and this information should be made clear in the program or event website, which would need to be paid by the HCP themselves rather than any Company sponsorship or support.

Questions to consider in assessing the reasonableness of hospitality include:

- Does the program description include items that could appear excessive (e.g., champagne reception, gala dinner)?
- Is there unreasonable or frequent traveling for meals during the event?
- Are meals arranged in tourist attractions?
- In the case of Third-Party Events including entertainment, is it clear that sponsoring companies will not be funding these activities?

Companies should consider implementing contractual agreements with the third-party organizers stating that their funding is to be used exclusively for the advancement of science and provision of education and not for entertainment or other leisure activities. Ideally, the third-party organizer would be requested to provide a transparent cost breakdown, with any entertainment and leisure activities clearly carved out/excluded from covered registration fees, and third-party organizers should be requested to clearly state the scope of company support in the program and the organizer's webpage.

Other issues related to Events and Meetings can be found in the IFPMA Code of Practice, Article 7- Interactions with Healthcare Professionals (e.g., gifts prohibition, distribution of materials during congresses).