

CODE OF CONDUCT
FARMINDUSTRIA

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TABLE OF CONTENTS

1. GENERAL PRINCIPLES

2. DIRECT PROVISION OF SCIENTIFIC INFORMATION

- General principles;
- verbal information imparted to physicians;
- informational material;
- promotional material;
- professional updating and scientific cooperation;
- advertising in newspapers and magazines;
- free samples.

3. CONFERENCE EVENTS, VISITS TO COMPANY LABORATORIES, REFRESHER COURSES AND INVESTIGATOR MEETINGS

- General principles;
- conference venues;
- regional events and scientific meetings at a local level;
- inter-regional events;
- international and national meetings;
- promotional materials used at congresses;
- online refresher courses and training;
- refresher courses;
- satellite symposia;
- visits to company laboratories;
- investigator meetings;
- the initiatives of professional relations;
- interactions with other non-prescribers involved in the administration of therapies;
- information to the public;
- interactions other than medicine promotion

4. RELATIONS BETWEEN THE INDUSTRY, SCIENTIFIC & HEALTHCARE SECTORS AND PATIENT ASSOCIATION

- scientific consultancy;
- scholarships;
- relations with scientific companies;

- clinical trials and drug-related studies;
- internet sites;
- relations between Pharmaceutical Companies, Patient Associations and Expert Patients;
- Patient Support Program.

5. TRANSPARANCY OF TRASFERS OF VALUE FROM PHARAMCEUTICAL COMPANIES TO HEALTHCARE PROFESSIONALS AND HEALTHCARE ORGANISATIONS

- Obligations of transparency;
- method of application;
- applicability of national codes;
- disclosure of data on an individual and aggregate basis;
- duplication;
- research and development expenses;
- methodology;
- attachment 1: data disclosure model;
- attachment 2: definitions.

REGULATORY BODIES AND IMPLEMETATION PROCEDURES OF THE CODE OF PROFESSIONAL CONDUCT

- The Supervisory Committee: composition and functions;
- the Single-Judge Tribunal: composition and functions;
- the Jury: composition and functions;
- the Secretariat, head-office and meetings;
- sanctions;
- amendments and supplements to the Code of Professional Conduct;
- stipulating the undertaking to abide by the Code of Professional Conduct.

THE FARMINDUSTRIA CODE OF PROFESSIONAL CONDUCT

1. GENERAL PRINCIPLES

- 1.1 In order to comply with the provisions of statute law and the rules laid down by the Codes of Conduct of European and international federations of the pharmaceutical industry (EFPIA and IFPMA), Farmindustria has drawn up a Code of Professional Conduct in the form of a voluntary agreement underwritten by the pharmaceutical companies belonging to Farmindustria. The Code sets out to regulate relations not only between companies but also their relations with the scientific and healthcare sectors.

All member companies of Farmindustria shall accept and comply with the provisions of the Code of Professional Conduct.

The following are excluded from the scope of this Code:

- Activities aimed at releasing non-promotional information, general information about companies (such as direct information to investors or the press), including financial data and descriptions of research and development, provided that Healthcare Professionals are not present in significant numbers.
- Institutional events organized by pharmaceutical companies on issues that go beyond promotional information, which are of interest to a variety of individuals from all areas potentially affected, which are held in right locations and in which healthcare professionals are present in amounts not prevalent.

On these occasions, however, cannot be provided for healthcare professionals present any form of hospitality or travel unless exceptional initiatives that shall be approved in advance by the Supervisory Committee.

- 1.2. The Code represents the commitment of the industry not only to abide by specific laws in force but also to operate on the basis of transparent standards of conduct that regulate the various circumstances in which corporate activities take place.

The regulations constituting the subject matter of the Code of

Professional Conduct have been drawn up in the general interest and to safeguard the prestige and honour of the pharmaceutical industry towards the state, public opinion, the medical profession and healthcare professionals in general.

- 1.3 The text of the code of professional behaviour shall be issued to all relevant public institutions, entrepreneurial organisations, professional associations and professional associations of healthcare professionals.
- 1.4 Observance of the code by the member companies of Farmindustria entails:
 - compliance with the resolutions of the governing bodies passed in conformity to the Farmindustria's byelaws, the principles of fair competition and democratic principles and abstaining from initiatives in contrast with such resolutions;
 - observance of fair competition between companies and in the management of all corporate operations, in all their various aspects, in such a way as not to harm the legitimate interests of others;
 - the contribution of each company towards the defence of the good name of the pharmaceutical industry towards the public at large.
- 1.5 In performing its activities the companies shall not damage the image of competing companies or their products. The companies shall also be ethically and professionally responsible for the behaviour of their personnel and shall, therefore, issue them with appropriate internal directives to regulate their conduct when engaged on corporate business.
- 1.6 The jurisdiction and activities of the Supervisory Committee and the Jury are exclusively designed to secure compliance with the Code of Professional Conduct.
- 1.7 Companies operating in Italy that belong to multinational groups shall be held responsible for the behaviour of their parent companies and associate companies for invitations issued to Italian physicians to attend events held either inside or outside Italy whenever such behaviour infringes the provisions of the Code of Professional

Conduct.

- 1.8 Promotional initiatives taking place in Italy, sponsored or organized by companies with head offices in Europe, are subject to the application of the Code of Professional Conduct of the country in which the pharmaceutical companies that sponsor these initiatives are based, and to the application of the Farmindustria's Code of Professional Conduct. Promotional initiatives taking place in Italy, sponsored or organized by industries that are based on non-European territory are subject to the EFPIA Code and to the Farmindustria's Code. In case of conflict between the provisions of the various Codes, the provision will be more narrowly.
- 1.9 Unless stated otherwise, the Code refers to relations between each of the member companies and healthcare professionals. The latter shall be understood to refer to the various types of physicians, pharmacists, and healthcare directors as also technical and administrative personnel employed in public and private healthcare structures.
- 1.10 For purposes of the application of the provisions of this Code of Professional Conduct the term "general practitioner" shall refer to a generalist physician who provides general medical services on behalf of the National Health Service, independently of any specialist qualifications that he or she may possess.
- 1.11 The provisions of this Code that apply to the general practitioner shall also apply to hospital pharmacists.
- 1.12 Pharmaceutical companies shall not, either directly or indirectly sponsor (by hiring rooms, equipment, etc.) organisations with no national or international scientific standing or whose mission is unknown. This prohibition especially applies to medical practices run by partnerships among physicians.
- 1.13 By February 28th of each year member companies shall acquire and submit to the President of Farmindustria a certificate attesting to the observance of procedures governing marketing and scientific information activities in the preceding year. The attestation shall be issued by entities recognised by ACCREDIA (Italian Body Of Accreditation) and may provide, exclusively for companies belonging

to the National Committee of the Small Industry the use of a simplified procedure according to the instructions of the respective Certification Bodies.

- 1.14 The provisions contained in this Code shall have no retroactive effect.
- 1.15 All the data where storage in hard copy is required by this Code, alternatively, it may be stored in electronic format as well. The provisions of the Chapter 5 of this Code stand unmodified.

2. DIRECT PROVISION OF SCIENTIFIC INFORMATION

General principles

- 2.1. Companies are responsible for the information and promotional actions conducted on their products even if arranged and/or performed by third persons (consultants, agents, agencies, etc.).
- 2.2 The information contents shall always be documented and documentable. Exaggerated statements, universal and exaggerated claims and indemonstrable comparisons without any objective basis are inadmissible.
- 2.3 The use of email, automated calling systems and other electronic communication means to divulge promotional material regularly approved by AIFA fax is prohibited, unless the company holds a prior written and documented consent of the physician to whom the material is addressed.

Verbal information imparted to physicians

- 2.4 When presenting information on medicinal products to healthcare professionals, medical sales representatives shall always qualify themselves and state the capacity in which they are acting.

- 2.5 Medical sales representatives shall not be engaged in healthcare or para-healthcare activities, or activities in any way connected to the use of drugs, neither on a gratuitous basis nor in any form of continuous gainful employment synonymous with that of a salaried worker.
- 2.6 Companies are responsible for training of medical sales representatives to provide information on the properties and characteristics of their drugs to healthcare professionals in a manner such as to allow them to be used for therapeutically correct purposes.
- 2.7 Companies will also be responsible for training of medical sales representatives to collect feedback on their drugs, as this is a means to ensure the fullest information on the products being marketed.
- 2.8 Medical sales representatives directed to provide scientific information on drugs shall also verify the presence of their products in pharmacies or in other point of sale and use their best efforts to ensure their traceability.

Information material

- 2.9 Where the scientific information is carried out using media computing facilities, mail or telephone, including through third persons, shall be fully respected the same regulatory provisions identified by the applicable law and the present Code on scientific information.
- 2.10 Apart from ministerial authorisations no omnicomprehensive statements are admissible such as "the preferred drug", "absolutely innocuous", "fully tolerated" or similar and no categorical assertions shall be made stating that a product has no collateral effects or toxicity risk.
- 2.11 Scientific citations shall accurately portray the meaning intended by the author(s).
- 2.12 The texts, tables and other illustrations taken from medical reviews or

scientific works shall be reproduced faithfully and in full, and with an exact indication of the source. No citations are admissible that appear partial and/ or contradictory with respect to the author's intentions when separated from the context in which they originally appeared.

The promotional material

- 2.13 As part of the information and presentation of medicines carried out by doctors or pharmacists, it is forbidden to grant, offer or promise prizes, pecuniary or in-kind advantages.

The promotional material concerning drugs and their use, sponsored by a pharmaceutical company, must have a negligible perceived value, in line with current national and regional legislation, be non-fungible and in any case linked to the activity carried out by the doctor and pharmacist.

In any case, the offer of economic incentives aimed at compensating for the time taken away by health professionals from their normal professional activity and dedicated to participation in congress events is prohibited.

It must also be ensured that all promotional material intended for doctors and pharmacists is purchased directly from the company centrally.

Professional updating and scientific cooperation

- 2.14 Free information material for scientific or professional consultation not specifically connected to medicinal products may only be distributed to public healthcare structures unless the material in question has a perceivably negligible value, namely a value of less than 25 euros. Companies shall procure such material directly through centralised functions.

Loans for use and donations

- 2.15 With regard to donations, loans for use and acts of liberality relating to instruments strictly related to the medical profession, these can only be made in favour of University Institutes, Hospitals, Nursing Homes and Public Health Organizations operating in the area (UCCP, Case health / MGI / PTA or similar) in compliance with the administrative procedures of

the Body and the regulatory framework that governs them. Outside the scope of clinical trials, donations or loan for use relating to fungible instruments - with different or alternative methods of use with respect to the diagnostic or therapeutic purpose - such as smartphones, smartwatches, tablets are not permitted to the aforementioned structures. or similar, to be assigned to doctors for personal use outside the facilities or to be given to patients.

Advertising in newspapers and magazines

- 2.16 In the ambit of newspaper and magazine advertising, companies shall comply with the rule of transparency and thereby accept, as an essential criterion, the net separation between information and advertising and hence guaranteeing the reader to be immediately able to recognise a promotional message, whatever its editorial or columnar layout.

Samples

- 2.17 Medical samples can only be supplied in response to a written request from physicians qualified to prescribe that particular medicine. Written request shall be signed, stamped and dated by physicians. Medical Representatives cannot supply more than 2 medical samples per physicians/visit of each form or dosage up to a maximum of 8 samples of each for or dosage for 18 months starting from the date of first marketing. Medical Representatives can also supply not more than 4 samples per physicians/visit up to a maximum of 10 samples per year of products chosen among those in company's products list that have been on the market for more than 18 months. Without prejudice to the provisions of article 125 of the Legislative Decree 219/2006.

3. CONFERENCE EVENTS, COMPANY LABORATORY VISITS, TRAINING COURSES AND INVESTIGATOR MEETINGS

General principles

3.1 Without prejudice to the statutory provisions in force on this question, the subject matter of these provisions shall be conventions, congresses and scientific meetings held to discuss themes, related in a variety of ways to the use of medicinal products, that provide an occasion for an industrial enterprise to meet healthcare professionals and entail addressing a number of participants.

The subject matter shall not include the so-called group interviews that shall, instead, be conducted, free-of-charge, directly on the premises of healthcare institutions or in medical surgeries where healthcare professionals perform their professional duties. No other circumstance is admitted. No form of hospitality can be offered within the framework of such initiatives (e.g. coffee-breaks, lunches, dinners).

3.1.bis Pursuant to Article 113 of Legislative Decree lgs.219 / 2006 companies can provide ‘the patronage of scientific congresses where persons authorized to prescribe or supply medicines participate’.

As part of the sponsorship of ECM congress events, it is forbidden for companies to identify and appoint directly or indirectly the lecturers and moderators, as well as to interfere with the scientific contents of the same congress event, in accordance with the regulations applicable to these types of events.

In any case, companies must implement a system of internal procedures that provide suitable mechanisms for verifying the economic adequacy of the sponsorship costs incurred by the company in support of congress events. The authorization of the sponsorship of congress events is left to the scientific director of the company.

Limited to the case of invitation to ECM congress events by medical specialists employed by public bodies or private affiliated structures, the invitation, even if managed by the sponsoring company, must be non-nominative and sent by the company to the public body / private structure with an appropriate agreement at least 60 days before the starting date of the ECM congress event. The invitation can be nominative only in cases where the indication of the healthcare worker is required by the public body / private facility under which the healthcare worker provides their activities and for which the body provides express authorization. The invitation must specify the

hospitality costs incurred by the company (by way of example only: registration fee, travel, accommodation) and attach the scientific program of the event. In case of non-response from the public body/private facility within the 30 days prior to the holding of the ECM congress event, the company will be tacitly authorized to invite the healthcare worker identified by the same, without prejudice to any more restrictive provisions adopted by the public body / private structure under agreement under which the healthcare operator provides its activities (by way of example: provisions that require express authorization from the public body / private structure under agreement).

- 3.2 With reference to the statutory provisions on the subject of the safeguarding of persons and other subjects in relation to the handling of personally-identifiable information (the law on privacy), a pharmaceutical company that intends to invite physicians to congresses, conferences, scientific meetings, refresher course and company laboratory visits shall, together with the professionals' acceptance, also acquire express consent to use their names and, where necessary, disclose these names to the Supervisory Committee, together with their date of birth and the indication of any specialisations acquired as well as proof of their compliance with the general and regional laws on the obligation to inform their reference healthcare structures of their participation in such sponsored visits to conference events. These requirements are exclusively for purposes of ensuring conformity to the Code of Professional Conduct and are limited to a specific conference or congress or the visit to a company laboratory. This provision is applicable only to company laboratory visits, not CME conferences, and CME refresher courses and conferences limited to cases of direct recruitment of doctors by pharmaceutical companies.

Failure to produce the documents indicated in the foregoing subsection by a company when requested by the Supervisory Committee of the Code of Professional Practice will automatically entail the referring the case to the Jury for the application of a possible sanction.

The forms used by healthcare professionals to express their consent to the handling of personally identifiable information shall be kept by the companies for a period of three years and may be used by the supervisory bodies specified in the Code of Professional Conduct and also for the purpose of verifying companies' compliance with the annual quantitative limits fixed under points 3.3, regarding the number of invitations permitted for each physician, as well as the percentages of actual participation by physicians under 40 years of age, in line with the requirements stated under the following point 3.11.

3.3 Participation in conference events by the companies shall be related to the role performed by the industries in the field of research, development and scientific information and shall be inspired by ethical, scientific and cost-effective criteria.

In this context the pharmaceutical companies may only offer economy-class air travel to Italian healthcare professionals invited to Italian conference events in Italy or abroad while the category of hotel accommodation shall not exceed four stars. In the case of rail transport is allowed all travel classes except for class Executive.

On the occasion of international conferences involving intercontinental flights longer than 6 consecutive hours of flight will be possible to offer the travel business class only for speakers and moderators included in the official program of the conference with the exception of those involved with the presentation of Posters.

In addition, companies may not invite a healthcare Professional to congresses, conferences, scientific meetings, refresher course and company laboratory visits more than twice a year. However, this restriction does not apply to speakers or moderators and the provision is applicable only to company laboratory visits, not CME conferences, and CME refresher courses and conferences limited to cases of direct recruitment of doctors by pharmaceutical companies.

Similarly, the limit shall not apply in the case of educational or training events concerned with specific pathologies, and taking place in concomitance with a public pronouncement by the World Health Organisation of potential healthcare crises higher than the IV alert level. In this case derogation from the limit can only refer to initiatives:

- exclusively designed to update physicians on the pathology;
- organised by public organisations;
- held on the premises of the foregoing public organisations;
- that have acquired ECM credits;
- that do not make provision for any kind of hospitality;
- for which prior information was sent to Farmindustria.

3.4 No meetings or congresses may be directly or indirectly organised by a company outside Italy if it is to be mainly attended by Italian physicians.

3.5 As concerns the choice of venue for meetings organised directly by a company, the latter shall provide the Supervisory Committee, in the

course of an investigation, good scientific, organisational and logistic reasons for the choice of the locality.

In no event may scientific initiatives be organised that also serve tourist purposes. And 'forbidden organization or sponsorship of congresses that are held or which provide the hospitality of the participants in structures that, by the type of services offered, are in conflict with the principles of the Code of Conduct as may occur, for example, for: Resorts, Ships, Castles that are outside the urban context, Masseria Farms, Agritourisms, Farms, Golf Clubs, Museums, Stadiums, Aquariums, Health Spas or facilities that have as a main activity services dedicated to Wellness or Spa.

- 3.6 Invitations issued to physicians by pharmaceutical companies to attend conferences and congresses are subject to the condition that the theme of the congressional meeting shall be pertinent to the specialisation of the physicians who will attend.
- 3.7 The primary objective of the participation in or organisation of international, national and regional conferences and congresses shall be to promote scientific cooperation between physicians.
- 3.7 bis Events carried out in hybrid mode or in which participation is expected both face-to-face and via the web will be governed by the following principles:
1. Participation in presence - please refer to the provisions envisaged for the realization of 'physical' events in relation to hospitality, locations, duration, etc.
 2. Participation via web - please refer to Article 3.18 of this code.

This rule applies to both speakers and learners and is valid for all events (ECM and otherwise).

The Conference venue

- 3.8 Events organised directly or indirectly by pharmaceutical companies shall be held in places and venues chosen for logistic, scientific and organisational reasons, which shall exclude venues in catering or restaurant facilities and they shall be characterised by a scientific programme that qualifies the event as an expert meeting. The participants invited to meetings shall be chosen on an international, national, interregional, regional or local basis. Places with tourist

vocation are rigorously prohibited in the periods June 1st - September 30th, as concerns seaside resorts and from 1 December 1st- March 31st and July 1st - August 31st, as concerns mountain resorts.

The Italian places that are on the sea and which are Regional Capitals or Province, headquarters also Universities and major Hospitals, are exempt from this prohibition. This, provided that the congress and the hospitality of the participants are concentrated in the urban context of the capital with the exclusion, however, of structures that are close to sea-equipped and accessible for bathing.

Regional events and scientific meetings at the local level

- 3.9 Regional events and scientific meetings at the local level are characterized by a geographical area of origin of the participants at the provincial level or the individual region. The events will have acquired CME credits and on this occasion may not be offered or hospitality except for the coffee break. For events that include a number of training hours than 6 may be offered a "light lunch" in the interval between the morning session and the afternoon session in the conference structure where the event takes place. Such events shall be held in locations such as hospitals, universities, foundations of scientific and conference rooms that ensure scientific dignity.

The interregional events

- 3.10 The interregional events are characterized by a 'balanced representation of physicians from at least three regions and may not require more than an overnight stay. These initiatives follow the same rules laid down in this Code for national events.

International and national meetings

- 3.11 The Pharmaceutical companies, with regard to non-CME conferences in Italy or abroad organised by scientific societies or public or private institutions and entities as well as conferences in Italy directly organised by companies, shall endeavour to ensure that at least 10% of the physicians chosen by them to attend the meetings will be under 40 years of age. In any event the companies shall guarantee that, on a yearly basis, 10% of the physicians participating in such events will be under 40 years of age.
- 3.12 The involvement of companies in the hospitality offered to participants in congressional events cannot exceed a 12-hour time period prior to

and immediately after the congress and such hospitality may not have characteristics such as to overshadow the technical-scientific characteristics of the event.

- 3.13 Any costs to be borne by the hospitality pharmaceutical companies may cover General practitioners, hospital pharmacists, pharmacists of the territory and, where applicable nurses, only in relation to CME events that are held in Italy.
- 3.14 In the context of conference meetings in or outside Italy it is forbidden to arrange or sponsor autonomous initiatives with social, cultural or tourist purposes, including gala dinners. Social dinners organised by the conference for the participants as a whole are allowed and shall be included in the inscription fees for the conference.
No hospitality of any kind or form can be offered to companions of the persons invited.
- 3.15 Non-CME Conference events organised at a national level by pharmaceutical companies may not, in terms of their proceedings, last less than six hours per day. The provision of this paragraph shall not apply to events organized directly by national and international scientific Societies.
- 3.16 Hospitality offered by pharmaceutical companies on occasion of congress events shall be limited to travel, accommodation and payment of the registration fees to the congress. During the days of the congress the hospitality offered may also include meals and drinks up to a threshold of 60 Euro per each Professional per meal for all events in Italy. As for events held abroad, referral shall be made to the amounts and thresholds mentioned in the relative country's Code of Professional Conduct, where applicable. In any other case, the limit remains fixed at 60 Euro also for events held abroad. The respect of the principle of sobriety shall, however, be guaranteed and the meal shall be offered preferably in the same hotel where the guests are staying or in contiguous structures.

Promotional materials used at the conference

- 3.17 During the conference events will be distributed gadget of negligible value and relevant to the profession of the doctor or the pharmacist with the exception of objects that recall graphically packaging of medicinal products. On gadgets will be written the name of medicinal products and / or the name of the active ingredient and / o the name pharmaceutical company

Updating and web-based training

- 3.18 The training and updating medical science made through the electronic instrument such as web meetings, e-meetings and similar events or FAD, cannot provide any form of hospitality and are not subject to any restriction in terms of the duration of the work.

Refresher courses

- 3.19 For medical - scientific refresher courses at any territorial level the same rules shall apply as those mentioned above for scientific congresses, conferences and meetings.
- 3.20 Companies are prohibited from organising or sponsoring the participation of professionals in refresher courses that do not have a medical or scientific character, such as foreign language, IT, or tax courses or similar initiatives. It's 'instead allowed the sponsorship of initiatives directed at healthcare professionals update identified in section 1.9 of this Code and relating to matters directly related to the healthcare management directly related to the drugs, provided that they are take in Italy, are organized by qualified entities, to take place in venues hospital or university or at least capable of ensuring scientific dignity and be completed within the course of a day with a forecast of at least 6 hours of actual work. In these cases, companies will not be able to bear any burden of hospitality except for a light lunch. It 's also allowed the sponsorship of initiatives whose duration is more than just a day in the case of national level events organized by companies qualified in relation to the subject matter. In this case pharmaceutical companies may also support the costs of travel and hospitality to the participants with a maximum of one night. These initiatives are subject to the provisions of this Code relating to national events.

The satellite symposia

- 3.21 If pharmaceutical companies shall ensure the organization of satellite symposia in conjunction with conference events in Italy or abroad, shall be complied with current regulations and ethical rules on Conferences and Meetings and, where applicable, the rules of Continuing Education in Medicine. These initiatives will be implemented or in the main event, or in half a day before the start or following the end of it. If it starts in the afternoon the satellite

symposium will be held in the morning of the same day or in the afternoon of the last day in the event that the main event will end at mid-day.

Visits to company laboratories

- 3.22 Healthcare Professionals may visit company laboratories on condition that appropriate time is dedicated to information-training within the framework of the visit, that the duration of the visit does not exceed the period of one day, that the hospitality offered is limited to a period of time not in excess of twelve hours prior to and immediately successive to the conclusion of the initiative and that its character shall not be such as to compromise the technical purposes of the visit. For such visits, pharmaceutical companies may only provide economy air travel and accommodation in hotels of no more than four stars. Moreover, no hospitality of any kind can be offered, in any circumstance, to any accompanying persons. The organisation of any type of social, cultural or tourist initiative, including gala dinners, is prohibited.

The Investigator meetings

- 3.23 The term Investigator Meetings shall refer to study meetings called by investigators for the purpose of pre-clinical, clinical or observational studies.

In the event that a company takes steps to organise specific Investigator meetings, such meetings shall comprise a number of participants proportionate to the number of centres involved in the study, address the formulation of a protocol to be filed at the local Ethical Committee or be attested to by the existence of a specific protocol filed with the local Ethical Committee, and have no promotional implications.

The duration of the initiative shall comply with a programme of work that excludes elements of tourism or recreation as well as hospitality for accompanying persons of any type.

The choice of the venue shall be made in compliance with the criteria fixed for the choice of conferences and congresses as well as the identification of the limits of hospitality. Do not allow the organization or sponsorship of initiatives that take place abroad where they concern studies involving mostly Italian centers or if you participate mainly

Italian doctors.

Where to get the seat Investigator meetings are necessary intercontinental flights longer than 6 consecutive hours of flight will be possible to provide for participants traveling in business class. This possibility is not applicable to Investigator Meetings related to observational studies.

The initiatives of Professional Relations

- 3.24 PR initiatives with Healthcare Operators (such as business lunches and dinners) may be carried out by pharmaceutical companies only if the following conditions are met:
- a modest number of Operators generally no more than 6;
 - company directors, possibly accompanied by an Area Manager or similar, with the absolute exclusion of operational territorial roles.
- Such initiatives must, moreover, be inspired by the principles of sobriety and shall not be of a repetitive nature.

Interactions with other non-prescribers involved in the administration of therapies

- 3.25 The companies, also through their local operational staff, will be able to carry out training and information activities in favour of non-prescribing subjects involved in the administration of the therapies, provided that these activities have no promotional purpose and the information processed is connected to the role of these subjects in the patient management process, in clinical research and in the correct and safe administration of therapy.

The use of the package insert, and of the materials made for the purpose of minimizing the risk of the use of medicines, is permitted so long as these are used in the format and, where applicable, in the manner authorized by the regulatory authorities.

Any form of advertising as defined pursuant to Legislative Decree 219/2006.

Participation in events, courses and congresses is permitted, in compliance with the legal limits only for initiatives having issues not related to medicines pursuant to art. 124, paragraph 9, Legislative

Decree. 219/2006. Any hospitality offered to other non-prescribing subjects by the companies may not exceed the value limits provided for by the Presidential Decree 62/2013, equal to 150 euros per year, and must be carried out in compliance with the regulations adopted by the relative bodies to which it belongs.

Information to the public

- 3.26 Pharmaceutical companies can reactively provide, through personnel not belonging to commercial or marketing areas, information to the public relating to products and pathologies of their therapeutic areas of competence provided that such information is not of a commercial nature and derives solely from the package insert or from institutional sites or from registers managed by Public Bodies/Institutions.

In any case, it is forbidden to provide therapeutic consultations or treatment recommendations.

It is possible to insert information including the brand name and the full and literal reproduction of the package leaflet as well as the faithful reproduction of the medicine packaging on the company's publicly accessible websites provided that such information has not been subject to a selection or reworking and is contained in a specific part of the site accessible, exclusively, through an active search action by the user who wants to obtain them.

Interactions other than medicine promotion

- 3.27 In order to respond to changes in the context and the information needs of the various stakeholders (such as institutions, healthcare professionals, non-healthcare workers and healthcare organizations), companies adapt their organizational structures and processes by putting in place a plurality of interactions that do not fall in the context of medicine promotion.

As a general rule, such non-promotional interactions must be carried out in compliance with the law and applicable regulations, guaranteeing the prohibition of carrying out any form of advertising of the medicine as defined pursuant to Legislative Decree 219/2006.

Further detailed requirements applicable to specific non-promotional interactions are provided below.

Access and institutional affairs

During the life cycle of the medicine, it is possible to carry out institutional activities, access or further non-promotional interactions with institutions and health professionals with the aim of ensuring the accessibility of medicines to treatment.

The use of materials with pharmaco-economic contents or related to the value of the product is allowed, understood in its meaning of economic advantage and savings for the health system, as well as in terms of health policies, pathology and patient journeys provided that these are differentiated by form and content from those used for promotional activities and do not contain promotional elements.

Account management

It is possible to carry out activities aimed at ensuring the application of commercial policies through interactions with public or private counterparties involved in medicine procurement processes.

The use of price lists as materials is allowed as long as they do not contain promotional elements.

Scientific Exchange

Through the medical affairs staff, it is possible to carry out activities aimed at mutual sharing of data and non-promotional information on issues related to the healthcare context and its dynamics towards healthcare professionals.

In particular, the proactive sharing of data and insights connected to clinical practice as well as factual and non-promotional information relating to the company pipeline or connected to the access activities of new products such as, by way of simplification, the information contained in institutional sites or registers is allowed. managed by public bodies / institutions, indexed independent publications or non-promotional congressional acts relating to national or international events.

Other types of information relating to company products may be provided to healthcare professionals only on a reactive basis and upon specific unsolicited request, companies adopt tools aimed at guaranteeing the traceability of requests.

4. RELATIONS BETWEEN THE INDUSTRY AND THE SCIENTIFIC AND HEALTHCARE WORLDS

Scientific consultancy

4.1 Pharmaceutical companies may avail themselves of the cooperation of physicians as consultants for services such as rapporteurs and moderators at conferences or invite them to participate in observational studies or training and education services. Such forms of cooperation entail that the following criteria be fully complied with:

- A written contract shall be stipulated between the physician and the pharmaceutical company specifying the nature of the service offered. The need for the service in question shall be clearly identified and stated.
- The contract shall also stipulate that the consultant undertakes to disclose his or her relationship with the pharmaceutical company whenever he or she writes or speaks in public on the subject matter to which the cooperative relationship refers. The same obligation also applies in the event that the pharmaceutical company employs physicians on a part-time basis who are also practising medical professionals.
- The company is required to keep the documentation on the services offered by consultants for a period of at least 3 years.
- The consideration paid by pharmaceutical companies for the services provided shall meet cost-performance criteria and reflect the market value of such services. The initiative shall guarantee coherence and appropriateness in respect of the objectives pursued and shall be capable of being fully documented.
- The decision on such initiatives shall be reserved to the executive top management.
- Whenever journeys or any form of hospitality are provided, the provisions set forth under subsection 3 of this Code, concerning conferences and congresses, shall apply.

Scholarships

4.2 The collaboration between pharmaceutical companies and scientific world can also be activated through scholarships. In this case, the bags

shall be designed to a project of considerable scientific interest with specific and measurable goals, and shall be subject to prior conclusion of a specific agreement with the facility where the beneficiary is active, in which are indicated all applicable requirements; shall have unique character and not normal not being able to repeat with the same structure with the same hospital or operating unit / Department before 3 years.

This time limit does not apply, therefore, in the case of different Operating Units / Departments, even if they belong to the same Hospital Structure. The decision-making aspect related to the granting of scholarships must be reserved for the company's top management. Finally, pharmaceutical companies must publish, through their websites, by June 30th of each year, the list of scholarships awarded for each single centre, in the previous calendar year, together with the economic value of each individual loans.

Relations with scientific societies

- 4.3 Pharmaceutical companies may establish relations of cooperation with scientific societies and medical associations on condition that they serve the exclusive purpose of divulging scientific knowledge and improving professional knowledge and are undertaken with entities of proven reliability and national standing, and whose mission is well known.

Clinical trials and drug-related studies

- 4.4 In the phase following the release of the marketing authorization of the medicinal products, only clinical trials authorized in accordance with the current legislation governing the matter are permitted. It must be ensured that clinical studies, 'post marketing' and post-marketing surveillance investigations are conducted exclusively for scientific purposes. The implementation by pharmaceutical companies of non-interventional (observational) clinical studies is subject to compliance with the provisions of the circular of the Ministry of Health 2 September 2002, n. 6, and the AIFA Determination of 20 March 2008 containing the Guidelines for the classification and conduct of observational studies on drugs.

The following criteria must also be respected:

- a written contract must be drawn up in advance between the sponsoring company and the bodies involved in the study in which the characteristics of the study itself and the nature of the services

- offered by the body and / or participating doctors must be specified in detail;
- the Study Protocol must be approved by the Corporate Scientific Service or by the Medical Management who must also monitor the conduct of the Study in compliance with the privacy legislation;
 - any remuneration recognized for participation in the Firm must be identified according to economic criteria and reflect the market value of the work performed;
 - the Study must not contain elements of induction or recommendation to prescribe or purchase a particular medicine;
 - the scientific representatives may be involved in the observational studies exclusively from the logistical point of view, with the exclusion of any aspect of an economic-financial nature. Any involvement must, in any case, take place under the supervision of the Corporate Scientific or Medical Management Departments and subject to adequate training.

It is understood that the company remains responsible for all activities related to these studies even if carried out with the support of third parties.

In the event that for the purposes of the study, carried out directly or indirectly by companies, it is necessary to use electromedical instruments aimed exclusively at the study itself (such as Holter, electrocardiographs and other telemedicine tools), the distribution to doctors of these instruments must be carried out through the Entity or Entities involved in the study (ASL, University, Hospital Entities and IRCCS) and its use must be regulated under a specific Agreement between the company and said Entities. In any case, the use of the equipment must be fixed-term, exclusively for the duration of the study. In the event that the experimentation or study consists of several phases or the company should conduct, at the same institution, several studies, in close sequence with each other (in which between the end of one study and the beginning of the next no more than 6 months elapsed), the Entity may send a formal request to the company to retain the asset, identifying the duration of the further (or further phase of) experimentation or study and the purposes of using the well, provided that it is stated that the centre cannot use the instrument for other purposes during the interval between one trial and the next. Companies will be able to accept this request with a formal response. The maximum duration of the concession to use the asset must not, however, exceed the overall duration of the trial or study. Also, the suitability of use of the asset must be guaranteed for the entire duration of the concession of use of the same. At the end of the study, the withdrawal of the asset must be expressly documented and made available by the pharmaceutical

companies concerned upon any request of the Control Committee in the context of investigative investigations.

Also in the context of these studies, the use of computer supports (both hardware and software) is not permitted unless such supports are absolutely essential for the conduct of the study and there is functional incompatibility between said supports and those in use by the bodies where the study in question is carried out, or there is a risk of mixing between the data functional to the conduct of the study - or in any case obtained during the same - with those already present in the instrumentation in use by these bodies. In any case, this computer material will be usable only for the purposes of the specific study for which it is intended.

As for instrumental equipment, also in this case, the distribution to doctors of such hardware and software supports must be carried out through the Body or Bodies involved in the study (ASL, University, Hospital Bodies and IRCCS) and its use must be regulated under a specific Convention between the company and said Bodies.

The aforementioned material must, in any case, be returned to the Sponsor / Promoter at the end of the study with tracking of the return. The Ethics Committee may carry out specific checks to verify the timely compliance with the provisions referred to in this paragraph.

Internet sites

- 4.5 Every internet site opened by an Italian company or a company operating in Italy that is addressed to the general public and Italian professionals, in addition to complying with the requisites laid down under the regulations and the pertinent laws in force, shall also guarantee that the sponsor, the source of all information set forth in the site, the designated recipients of such information and the objectives of the site are all clearly identified and/or specified. In all cases it shall be guaranteed that access to sections containing promotional information on the company's products shall be exclusively reserved to pharmacists and physicians.

Relations between Pharmaceutical Companies, Patient Associations and Expert Patients

- 4.6 Any form of direct or indirect financial support from a pharmaceutical company towards a patient association must be in compliance with the following criteria:

- a specific agreement must be signed in advance to regulate the amount of the loan and the purpose for which it is disbursed. To this end, each pharmaceutical company will have to develop a standard internal approval process for this category of agreements;
- the public use by a pharmaceutical company of the logo or material owned by a Patient Association must be authorized in advance by that Association. In order to acquire the authorization, the purposes and methods of using the logo must be clearly defined;
- any form of sponsorship by pharmaceutical companies towards patient associations must be transparent and free from promotional purposes;
- no company may request a patient association to be the sole lender;
- in all cases where travel or any form of hospitality is envisaged, the provisions referred to in point 3 of this Code regarding conventions and congresses are applied;
- Pharmaceutical companies must make public through their website, for a period of at least 3 months coinciding with the first quarter of each year, the list of patient associations supported by them in the previous year, together with the purposes underlying this support and the economic value of the loans disbursed to each Association.

For the sole purpose of supporting public health or research, contracts may be stipulated between pharmaceutical companies and patient associations aimed at providing the companies with specific services; these activities must not have promotional purposes.

The involvement of representatives of patient associations is also allowed and, subject to the application of a specific segregated approval process, of 'expert patients', such as consultants for services such as participation in advisory boards and speakers; the reasons underlying the activation of consultancy assignments with expert patients must be well defined, documentable and non-promotional and have the purpose of collecting or disseminating information and insights aimed at understanding the needs of patients and their point of view. The activation of these tasks is delegated to non-commercial functions.

Patients are considered 'expert patients' who, in addition to having direct knowledge of the disease, have specific skills and experience in aspects related to medicine research and development, regulatory

activities or advocacy activities understood as the ability to promote and support the causes and needs of a plurality of patients; these skills must be effective and documentable and may be accompanied by certifications or certificates issued following participation in courses and training programs carried out by qualified and independent third parties.

When assigning tasks to expert patients, the possession of the integrity requirements and the absence of conflicts of interest must also be verified; this verification can also be carried out by means of a specific self-declaration.

In the event of assignment of assignments to individual members of Patient Associations and 'expert patients', companies will be able to support or reimburse, where documented, any travel and hospitality costs necessary for carrying out the assignment in compliance with the provisions applied to travel and hospitality provided for in point 3 of this Code of Ethics.

In the event of assignment of assignments to 'expert patients', a suitable form of remuneration may also be provided, as long as it is reasonable, appropriate and strictly proportionate to the nature and duration of the assignment.

For the management of the services, an agreement or a preventive contract must be signed which specifies the nature, the methods of carrying out the assignment and, where applicable, the criteria for the payment of the services themselves. As part of the contract, the need to use these services must be clearly identified and documented.

The contract with expert patients must also include the obligation for the consultant to declare the relationship in place with the pharmaceutical company on all occasions in which he writes or speaks in public on the subject of the consultation.

Pharmaceutical companies will each year have to publicize the list of patient associations for which service contracts have been stipulated.

Finally, for expert patients, pharmaceutical companies will have to make public in an aggregate form the total amount of transfers of value made as well as, subject to the acquisition of specific consent, the list of individual names involved.

Patient Support Program

- 4.7 Patient Support Program (PSP) is defined as an initiative that has as its purpose the provision, by the pharmaceutical company, of additional services and not substitutes to those of the institution or the NHS for the direct benefit of the patient being treated with a specific medicine already authorized for placing on the market.

The pharmaceutical company will be able to finance a provider to organize a PSP. In this case, the provider may send its specialized, qualified and previously trained personnel to the patient's home or to public or private health facilities, provided that the relationship between the company and the supplier falls within the form of a service contract, therefore without any form attributable to the administration of labour or posting. The company is, in any case, responsible for the services provided by the external provider in charge.

The program and the material used must not, in any case, be a promotional tool, but only functional to the communication of information necessary for the appropriate use of the medicine.

The duration of the services offered by the PSP must be previously defined and congruous with respect to the identified need and the relative desired benefit for the patient. The corporate function that has the decision-making responsibility of the PSP must not be commercial and operates under the supervision of the company's compliance function. The PSP must guarantee the management of pharmacovigilance, the management of privacy, the responsibility for the management of materials, the responsibility for compliance.

The pharmaceutical company must remain extraneous to the processing of personal data of patients involved in the PSP. The company will only be able to view aggregated data for statistical purposes on the use of the service.

5. THE TRANSPARENCY OF TRANSFERS OF VALUE AMONGST PHARMACEUTICAL COMPANIES, HEALTHCARE PROFESSIONALS AND HEALTHCARE ORGANISATIONS

Obligation of transparency

- 5.1 On an annual basis, each pharmaceutical company shall document and render public, by using the template that constitutes part of this code

(att. 1) , all transfers of value carried out directly or indirectly to Healthcare Professionals and Organisations, as identified in the Definitions Attachment (att. 2). The disclosure of this data shall come about on an individual basis and any eventual disclosure in aggregate form, as per the following point 5.5, shall represent an exceptional circumstance.

Data shall be published on the company's website. Companies are required to keep, alternatively also in electronic format, the appropriate documentation for at least 3 years where it states that consensus has been requested from the Healthcare Professional on the disclosure of data. The verification on the existence of a policy aimed at the systematic acquisition of the above mentioned consensus' will be carried out annually and this is included in the activities of Certification as laid down in point 1.13 of the general principles of the Code of Professional Conduct.

- 5.2 The exclusion of the obligation to disclosure is on transfers of value connected to OTC medicines and those related to promotional materials referred to in point 2.13 of this Code, to meals and drinks and to medical samples.

Method of application

- 5.3 The disclosure of the information connected to the transfers of value shall be carried out on an annual basis starting from 2016 with reference to economic data regarding 2015.

Pharmaceutical companies may indicate the transfers of value exclusively by choosing exclusively cash-based or accruals-based criteria. These criteria must be followed for a period of no less than 3 years.

The pharmaceutical companies shall disclose the transfers of value carried out during each year, within the first six months of the following year. The information shall remain public domain for a period of at least 3 years from the moment of disclosure. The companies shall, moreover, conserve, alternatively also in electronic format, the documentation to support the data disclosed for a period of at least 5 years and make it available also in detailed form to any requests from the Healthcare Professionals involved.

Applicability of the national Codes

- 5.4 The data regarding the transfers of value shall be disclosed in the state where the recipient has their own domicile and will be governed by the

rules laid down in the Code of Professional Conduct of that state. When a company does not have a subsidiary or affiliate in the country where the recipient has their own domicile, the providing company shall, however, disclose the data regarding the transfers of value to that person according to the rules and regulations of the Code where the recipient is domiciled.

Disclosure of data on an individual and aggregate basis

5.5 Each pharmaceutical company shall disclose, on an individual basis for every recipient, the amount of the transfers of value carried out during the previous year with reference to:

- a) expenses for the participation at conferences and congresses regarding registration fees, travel and accommodation (excluding meals and drinks);
- b) expenses for consultancy and professional activities not otherwise covered in letter a), resulting from a specific contract between the company and individual Healthcare Professionals where the type of service is stated.

To this end, pharmaceutical companies shall do the utmost possible to obtain consensus from the Healthcare Professionals. If the Healthcare Professional does not give their consensus on data privacy, the company shall disclose the data on an aggregate basis.

If this is this case, for each of the categories listed in the previous letters a) and b), the following data shall be identifiable:

- the number of recipients on an absolute basis and as a percentage of the total recipients;
- the aggregate data attributable to those Healthcare Professionals;
- the percentage of the transfers of value as an aggregate of the total transfers.

5.6 Each company shall disclose the amount of the transfers of value carried out for each Healthcare Organisation, as laid down in the definitions in attachment 2 to this Code, during the previous year with reference to:

- a) donations and grants (including free-of-charge leases) both in cash and benefits in kind;

- b) direct or indirect contribution to congress events carried out through healthcare structures or third parties, including the sponsorship of doctors to conferences and congresses with the payment of the registration fees and the expenses of travel and accommodation;
- c) economic transactions related to consultancy and professional activities resulting from a written contract between the company and the Institute/Organisation or Association that provide any type of service not covered in a) or b).

Duplication

- 5.7 In the case a transfer of value has been made to an individual Healthcare Professional indirectly via a Healthcare structure or third party, this data shall be disclosed on an individual basis where possible, and only once.

Research & Development expenses

- 5.8 The annual expenses that pharmaceutical companies incur for activities shall be disclosed in aggregate form. These include those related to planning and actuation of:
- a) non-clinical studies, as defined in the Good Laboratory Practices;
 - b) clinical studies, as defined in the Directive 2001/20/CE;
 - c) observational prospective studies, according to point 4.4 of this Code, that involve the gathering of data on patients by individuals or groups of doctors.
- 5.9 Expenses related to Investigator Meetings, Advisory Boards or hospitality where they are connected to the activities according to point 5.8 above shall be disclosed on an aggregate basis.

Methodology

- 5.10 Each pharmaceutical company shall disclose a note summarising the methodology used to lay down data with reference to information regarding VAT, currency or possible fiscal aspects connected to the transfers of value in individual or aggregate form.

ATTACHMENT 1

	Full Name <i>(Art. 1.01)</i>	HCPs: City of Principal Practice HCOs: city where registered <i>(Art. 3)</i>	Country of Principal Practice <i>(Schedule 1)</i>	Principal Practice Address <i>(Art. 3)</i>	Unique country local identifier <i>OPTIONAL</i> <i>(Art. 3)</i>	Donations and Grants to HCOs <i>(Art. 3.01.1.a)</i>	Contribution to costs of Events <i>(Art. 3.01.1.b & 3.01.2.a)</i>			Fee for service and consultancy <i>(Art. 3.01.1.c & 3.01.2.c)</i>		Transfers of Value re Research & Development as defined <i>(Art. 3.04)</i>	TOTAL <i>OPTIONAL</i>	
							Sponsorship agreements with HCOs / third parties appointed by HCOs to manage an Event	Registration Fees	Travel & Accommodation	Fees	Related expenses agreed in the fee for service or consultancy contract			
INDIVIDUAL	INDIVIDUAL NAMED DISCLOSURE - one line per HCP (i.e. all transfers of value during a year for an individual HCP will be summed up: itemization should be available for the individual Recipient or public authorities' consultation only, as appropriate)													
	HCPs	Dr A					N/A	N/A	Yearly amount	Yearly amount	Yearly amount	Yearly amount	N/A	
		Dr B					N/A	N/A	Yearly amount	Yearly amount	Yearly amount	Yearly amount	N/A	
		etc.					N/A	N/A	Yearly amount	Yearly amount	Yearly amount	Yearly amount	N/A	
		OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons												
	Aggregate amount attributable to transfers of value to such Recipients - Art. 3.2						N/A	N/A	Aggregate HCPs	Aggregate HCPs	Aggregate HCPs	Aggregate HCPs	N/A	Optional
	Number of Recipients (named list, where appropriate) - Art. 3.2						N/A	N/A	number	number	number	number	N/A	Optional
	% of total transfers of value to individual HCPs - Art. 3.2						N/A	N/A	%	%	%	%	N/A	N/A
	% on total of Recipients - Art. 3.2						N/A	N/A	%	%	%	%	N/A	N/A
	HCOs	INDIVIDUAL NAMED DISCLOSURE - one line per HCO (i.e. all transfers of value during a year for an individual HCO will be summed up: itemization should be available for the individual Recipient or public authorities' consultation only, as appropriate)												
HCO 1						Yearly amount	Yearly amount	Yearly amount	Yearly amount	Yearly amount	Yearly amount	N/A	Optional	
HCO 2						Yearly amount	Yearly amount	Yearly amount	Yearly amount	Yearly amount	Yearly amount	N/A	Optional	
etc.						Yearly amount	Yearly amount	Yearly amount	Yearly amount	Yearly amount	Yearly amount	N/A	Optional	
OTHER, NOT INCLUDED ABOVE - where information cannot be disclosed on an individual basis for legal reasons														
Aggregate amount attributable to transfers of value to such Recipients - Art. 3.2						Aggregate HCOs	Aggregate HCOs	Aggregate HCOs	Aggregate HCOs	Aggregate HCOs	Aggregate HCOs	N/A	Optional	
Number of Recipients (named list, where appropriate) - Art. 3.2						number	number	number	number	number	number	N/A	Optional	
% of total transfers of value to individual HCOs - Art. 3.2						%	%	%	%	%	%	N/A	N/A	
AGGREGATE		AGGREGATE DISCLOSURE												
		N/A	N/A	N/A	N/A	N/A	OPTIONAL	OPTIONAL	OPTIONAL	OPTIONAL	OPTIONAL	OPTIONAL	TOTAL AMOUNT	OPTIONAL

ATTACHMENT 2

DEFINITIONS RELATING TO POINT 5 OF THE CODE ON TRANSPARANCY OF THE TRANSFERS OF VALUE

Recipient

Any Healthcare Professional or Organisation that carries out a profession or principle activity or that has the main domicile or legal head office in Europe.

Donations and Grants

By donations and grants (including free-of-charge leases) these must include all the supplies, in cash or kind, destined either directly or indirectly to the Healthcare Organisations as defined hereafter.

Events

All the events of a promotional nature whether scientific or professional such as congresses, conferences, symposiums and other similar initiatives (including as examples Advisory Boards, visits to company plants, Investigator Meetings finalised towards clinical studies and not interventional) organised or sponsored by pharmaceutical companies.

Healthcare Professionals

Any person who carries out their activity in the medical sector, dentistry, public, private or hospital pharmacies, any nurses, Administrators or staff of Local Health Authorities, any technical or administrative personnel of public or private healthcare structures and any other person within the scope of their professional activity can prescribe, dispense, purchase or administer a medicinal speciality and that has their activity mainly in Europe. Intermediary pharmaceutical distributors are however excluded.

Healthcare structures

Any structure whether it is an association or medical, scientific, healthcare or research organisation, (independently from its legal form) such as Hospitals, Clinics, Foundations, Universities, specialisation and training schools (except for patient associations) that have their legal headquarters or main office or activity in Europe, or through which a Doctor may practice.

Research and Development

The transfers of value connected to the research and development include those activities planned or carried out with the aim of developing non-clinical studies as defined in the Good Laboratory Practices, clinical studies, as governed by Directive 2001/20/CE, and non-intervention studies that are prospective in their nature and that involve the gathering of information on patients by doctors for the study itself.

Subjects that must respect the obligations of transparency

The pharmaceutical companies associated to Farmindustria and all their subsidiaries and affiliates are bound to respect the obligations laid down in point 5 of the Professional Code of Conduct. The pharmaceutical entities that are legally separate but part of the same group are also bound to respect the Code.

Transfers of value

Economic transfers whether direct or indirect, both in cash or kind, carried out for either promotional aims or for the development and commercialisation of pharmaceuticals for human use subject to medical prescription. The direct transfers are those carried out directly between the company for the benefit of the recipient. The indirect transfers are those carried out on behalf of the company by a third party.

REGULATORY BODIES AND PROCEDURES FOR IMPLEMENTING THE CODE OF PROFESSIONAL CONDUCT

Article 1

The Bodies

The bodies set up to supervise and execute procedures for the code of self-regulation are the Supervisory Committee, the Single-Judge Tribunal and the Jury.

Article 2

Supervisory Committee

The Supervisory Committee is made up of 17 members, including the President. The President of the Committee is appointed by the President of the Supreme Court of Cassation and chosen from among the retired Magistrates of the most representative districts on the national territory who have exercised higher managerial functions. He remains in office for 3 years and can be reconfirmed only once. The 16 members are nominated by the Farmindustria Council and chosen from among the legal representatives of the associated companies (or their permanent delegates, whether they are members of the Management or the Board of Directors of the Company) in a ratio of eight representing the Italian-owned companies and eight representing companies predominantly foreign-owned. The members of the Committee remain in office for two years and can be reconfirmed. The legal representative of the associated company who has not received, during the last 12 months, specific sanctions by the presiding Single Judge Tribunal or Jury or who has no specific pending investigation by the presiding Single Judge Tribunal or Jury. For the exercise of its functions, the Committee may make use of consultants chosen according to the needs of the case. Any member who does not participate in three meetings during the year is replaced.

Article 3

Single-Judge Tribunal

The Single-Judge Tribunal is constituted by a member of the Jury as stated in the following article 4, chosen by the Jury itself from among its members. He or she may avail him/herself of a consultant appointed by the National Federation of Medical Associations from independent physicians of recognised standing who no longer perform professional work and a consultant chosen from representatives of the pharmaceutical sector who hold no positions of corporate responsibility. The consultants do not have voting rights.

The judge is chosen, hearing-by-hearing, in rotation, from the members of the Jury on the basis of age, commencing from the youngest and he or she shall not participate in any appeal hearings before the Jury to discuss the decisions that he or she took.

The judge shall consider the sanctions proposed to him or her by the Supervisory Committee and deliver his/her decisions concerning the sanctions in conformity to the following article 14.

Article 4

The Jury

The Jury is made up of the Chairman and three members.

The Chairman of the Jury is appointed by the Presiding Judge of the Court of Cassation and is chosen among retired judges in the most representative districts within the national territory who have had important management responsibilities. Two members are appointed by the Presiding Judge of the Court of Milan and chosen from retired judges. One member is appointed by the National Council of the Bar and chosen from qualified and retired lawyers. The Jury shall also avail itself of the services of a consultant appointed by the National Federation of Medical Associations to be chosen from independent physicians of recognised standing and who no longer perform professional work, and an industrial consultant chosen from representatives of the pharmaceutical sector who no longer hold positions of corporate responsibility. The consultants do not have voting rights. The President, members of the jury and Advisors hold office for 3 years and can be reconfirmed once. During the initial application of this provision after 3 years after its entry into force will proceed to the renewal of half of the members of the Jury and half of consultants. The Chairman of the Jury shall adopt measures at his/her own discretion to decide organisational and management matters referring to the Jury and the Single-Judge Tribunal.

He/she is responsible for relations with the Supervisory Committee, the Single-Judge Tribunal and the Presidency of the Association.

The members of the Jury and the Chairman of the Supervisory Committee, upon acceptance of the office, shall expressly declare that they have no current professional relations or interests with the member companies and undertake not to establish such relations during the tenure of their office.

In agreement with the secretariat, the Jury fixes the dates of its hearings and those of the Single-Judge Tribunal and draws up the internal regulations governing the working of the Jury and the Single-Judge Tribunal.

At the request of associate bodies, the Jury provides opinions on the Code of Professional Conduct and where necessary can convene the Supervisory Committee and the Jury in a joint sitting.

The Jury decides appeals on the basis of all the elements collected by the Supervisory Committee and the Single-Judge Tribunal.

Article 5

The investigative, proactive and consultative functions of the Supervisory Committee

The Supervisory Committee shall:

- draw up internal regulations to protect the confidentiality of the work conducted by the committee;
- order - upon receipt of a circumstantial report received from a recognised source - investigations into cases related to presumed infringements of the code;
- submit to the Single-Judge Tribunal proposals in order to sanction alleged infringements of the code, which, in its opinion, have been proven.
- express non-binding opinions at the request of members or the Chairman of the Jury.

Article 6

Fact-finding function of the Supervisory Committee

The Supervisory Committee can carry out, within the framework of the ascertainment to be made in the investigative phase, fact-finding activities on the premises of the companies, for the sole purpose of the investigation in hand, by means of an auditing company to be specifically appointed on a case-by-case basis. Furthermore, the Supervisory Committee, for its fact-finding mission regarding alleged violations of the Code of Professional Conduct, may appoint a specialised company of proven integrity, to carry out specific investigations on congressional events and promotional activities conducted within the territory, with exclusive reference to the field of application of the Association's Code of Professional Conduct and the specific laws in force regulating the provision of scientific information on drugs.

Article 7

Guideline-setting function of the Supervisory Committee

The Supervisory Committee performs a preventive advisory function with regard to cases that while not representing blatant infringements of the code do not appear to comply with the general principles of the code and members' ethical standards.

In such circumstances it shall inform all members - while guaranteeing the anonymity of the companies involved – that the behaviour in question does not comply with the principles indicated in this subsection and, whenever necessary, shall submit adjustments and supplements to the Code of Professional Conduct that regulate such cases to the Governing Council for approval in line with the provisions of the following article 17.

Article 8

Secretariat

A Secretariat for the Supervisory Committee and the Jury is instituted. The secretariat is made up of a secretary chosen from the functionaries of the Association. The secretariat's functions are as follows:

- to receive and prepare the documentation on the reports received;

- to prepare an explanatory report for the Supervisory Committee, the Single-Judge Tribunal and the Jury;
- to provide assistance to the collective bodies in their operations by appropriately storing the documentation and filing the relative acts.

Article 9

Headquarters and Meetings

The Supervisory Committee, the Single-Judge Tribunal, the Jury and the offices of the Secretariat are based at Farmindustria.

The Supervisory Committee, the Single-Judge Tribunal, the Jury meet whenever the need arises, upon convocation of the respective Presidents, to be communicated at least three days prior to the date set by them.

This term may not be observed in cases of particular urgency. The meetings of the Supervisory Committee, the Single-Judge Tribunal and the Jury are not public. The Supervisory Committee and the Jury are validly constituted with the presence of the majority of the members in office.

The Supervisory Committee and the Jury deliberate with the vote of the majority of the members in office; in the event of a tie, the vote of the chairman prevails.

For changes to the Code of Ethics or the Regulations, the Committee must express itself by a qualified majority (2/3 of the members).

The Supervisory Committee, the Single Judge and the Jury are assisted by the Secretariat which is bound by official secrecy.

Article 10

Applications to the Supervisory Committee

The Supervisory Committee examines the reports and information written in non-anonymous form or in any case the specific facts that emerged during an investigation.

Written reports must be addressed to the President of the Supervisory Committee, by registered mail with acknowledgment of receipt, to the headquarters of Farmindustria in Rome, or by certified e-mail. The receipt will be recorded in a specific internal protocol.

Only reports referring to events occurring in the 12 months preceding the date of receipt of the same will be considered valid.

In relation to the communication, if it does not appear manifestly without

foundation, the Committee initiates an investigation and for the execution of which it may make use of technical consultants chosen according to the need of the case. In particular cases, in which a more detailed investigation is required, the Chairman may entrust this investigation to one or more specially chosen representatives of the Committee.

The Supervisory Committee, at the time of the first examination of discovering a possible ethical violation, then informs the company concerned, through the Secretariat, inviting it to provide written clarifications and to appear for a specific hearing on the matter. This hearing is reserved exclusively for the legal representative of the company concerned who can be accompanied, if necessary, by a company official or his consultant. The prior hearing of the company concerned is mandatory, except in the case of immediate archiving. Together with the request for clarification, the company is in any case invited to provide all the useful documentation in their possession that is believed to contribute significantly to the formation of the Committee's opinion.

During the eventual hearing, the Supervisory Committee will also inform the company about all the evidence it was in possession of.

The investigation may involve the filing of the case or the adoption of a specific sanction proposal. Minutes are drawn up of the meetings of the Supervisory Committee which, in compliance with the information rules for Members, guarantee the anonymity of the companies involved in the proceedings.

Specific information is provided to the whistle-blower on the conclusions of the investigation.

Article 11

Decisions Proposed by the Supervisory Committee

If the Supervisory Committee, upon concluding the investigation procedure, establishes that a specific infringement of the code has taken place, it will decide to propose a specific sanction and notify the company concerned.

In the event that the company recognises its own responsibility and simultaneously and formally undertakes to change its conduct the Supervisory Committee will inform the Single-Judge Tribunal of these undertakings and may make a reasoned proposal for a less severe sanction than that originally proposed.

Article 12

Proceedings before the single judge tribunal

The single Judge tribunal, having received formal communication from the Supervisory Committee containing the sanction proposal formulated against the company concerned, orders the communication of the procedure to the company itself, assigning it a term of no less than eight, and no more than fifteen days, for the submission of any deductions. Upon communication, the company concerned, in through its legal representative, may intervene in the discussion before the presiding judge. The legal representative of the company may be accompanied, if necessary, by a trusted collaborator. It is possible for the company involved to present to the single Judge tribunal even new documentation that justifiably could not be provided to the Supervisory Committee before formulating its judgment. Such late documentation must, in any case, be provided in advance to the Committee. A specially delegated representative of the Supervisory Committee participates in the discussion, who will be heard by the presiding Judge to answer his questions about the procedure already carried out without the Committee ever assuming the position of a party in the proceedings.

Once the discussion is over, the presiding Judge reaches their decision and notifies the company concerned. After 30 days from this communication, if the company does not appeal to the Jury, the decision taken is also notified to the Farindustria Board. In this case, the decision is immediately enforceable - except in the case referred to in the following art. 14, letter d) - and specific information is given to all associated companies.

The sanctioned company must communicate the final sanction received to its certifying body, referred to in point 1.13 of this Code.

At any time during the proceedings, the presiding judge may request opinions from the Supervisory Committee.

Article 13

Appeal procedure

Within 30 days from the date of communication of the decisions of the Single-Judge Tribunal, the company can lodge an appeal before the Jury together with any additional documentation. In that regard, the jury will consider only those appeals that are properly motivated.

Having received the appeal, the Jury makes provision to notify the company concerned of the date of the appeal meeting, which shall be fixed within 30 days from the date on which the appeal was filed.

Subject to the receipt of this communication, the company, in the person of its legal representative, may participate in discussions before the Jury.

The Jury may request new documentation or arrange for a supplementary investigation through the Supervisory Committee.

A specially appointed representative of the Supervisory Committee, who may also file written briefs, will participate in the discussions.

When the discussions are terminated, the Jury will make a ruling and communicate it to the company concerned and to the Governing Council of Farmindustria. All member companies will be apprised of the decision by a specific circular.

Article 14

Sanctions

The sanctions that may be applied by the Single-Judge Tribunal in the event of proven infringements of the provisions of the Association's Code of Professional Conduct are as follows:

- a) warning with a request to cease any behavior, if still in use, and ban it completely if necessary;
- b) written reprimand;
- c) temporary suspension;
- d) expulsion.

In addition to the sanctions stated under the foregoing letters b), c) and d) a graduated pecuniary sanction may also be applied, whose amount will depend upon the seriousness of the violation as well as the damage to the image and reputation of the sector, the number and nature of previous and, whenever quantifiable, the expenditure borne by the company for the carrying out the initiative forming the subject matter of the judgement.

The sanction may not, in any case, exceed the sum of €200,000.00 (two hundred thousand). In the event that a company accept the decision of the single-judge and thereby expressly waive its right of appeal to the jury, it will be accorded a reduction of one quarter of the pecuniary sanction.

In the event of a violation committed within a 12-month period successive to any violation for which a company had already been required to pay the full pecuniary sanction, the foregoing €200,000.00 (two hundred thousand), will not apply.

The application of the sanction referred to under d) shall be formally approved by the Governing Council.

If the Single-Judge Tribunal were to decide to apply a sanction different from the warning with a request to cease any behavior and / or with disqualification of the same or a written censure without pecuniary sanctions, twice against the same company for infringements committed in the space of 24 months, it will, through the offices of the Association, disclose the decision on a newspaper with national circulation along with the name of the offending company. In the event that the date of the infringement could not be ascertained, reference will be made to the date of the violation's report in order to determine whether the foregoing 24-month period has elapsed.

Article 15

Loss of office of a member of the Supervisory Committee

The member of the Supervisory Committee whose company is formally sanctioned by the Jury or by Single Judge will automatically forfeit office as soon as the decision is notified to him.

Article 16

Procedural costs for the ruling

All the costs sustained by the Association shall be for the account of the company in question.

Article 17

Amendments and supplements to the Code of Professional Conduct

Amendments and supplements to the Code of Professional Conduct that represent an integral part of the byelaws of the Association shall be approved by the Governing Council at the proposal of the Supervisory Committee.

Article 18

Stipulating and undertaking to abide by the Code of Professional Conduct

When the Code of Professional Conduct is issued each member company belonging to Farindustria in the person of its legal representative shall, as an essential condition for their membership of the Association, be required to make a specific undertaking that it accepts the code and will not impede the work of the bodies set up to monitor and enforce it.