

BUSINESS PRINCIPLES FOR PROMOTING INTEGRITY IN THE PHARMACEUTICAL SECTOR

A regional multi-stakeholder initiative for Latin America's pharmaceutical industry led by Transparency International's Pharmaceuticals and Healthcare Programme. This document has been designed to provide companies with practical guidance and a reference point for developing their own policies and procedures for promoting integrity.

1 SIGNATORY COMPANIES COMMIT TO:



- a** Conduct their business fairly, honestly and transparently.



- b** Implement and/or maintain an effective Programme to support the Principles of integrity, transparency and accountability.

2 INTEGRITY PROGRAMME FOUNDATIONAL PRACTICES:



- a** Promoting integrity to prevent bribery and conflicts of interest.



- b** Tailoring the Programme to reflect the Company's particular business circumstances and culture.



- c** Complying with all laws relevant to countering bribery and conflicts of interest in the different jurisdictions.



- d** Including information about matters material to the effective development and implementation of the Programme.



- e** Reflecting and communicating the contribution of modern medicine to public health and welfare, and the fundamental importance of integrity to this mission.

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SCOPE OF THE INTEGRITY PROGRAMME



a Bribes.

b Political contributions.



c Charitable contributions and sponsorships.

d Gifts, hospitality and expenses.



e Interactions with healthcare professionals conducted in a transparent and ethical manner that does not interfere with their independence.



f Interactions with patient organisations conducted in a professional and ethical manner that does not interfere with their independence.



g Interactions with healthcare institutions conducted in a professional and ethical manner that does not interfere with their independence.

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INTEGRITY PROGRAMME IMPLEMENTATION REQUIREMENTS:



a Ensuring the existence of an effective Programme for combatting bribery and conflicts of interest carried out consistently with clear lines of authority.



b Extending the Programme to all business activities and relationships.



c Reflecting the company's commitment to the Programme in all human resources activities.



d Providing appropriate training on the Programme to all employees and business partners.



e Encouraging employees and others to raise concerns and report suspicious circumstances ("whistleblowing") through

secure and accessible channels;



f Establishing effective mechanisms for internal and external communication of the Programme.



g Establishing and maintaining an effective system of internal controls to counter bribery and related conflicts of interest.



h Establishing feedback mechanisms and other internal processes supporting the continuous improvement of the Programme.



i Cooperating with relevant authorities in connection with bribery and corruption investigations and prosecutions.