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.

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.

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.
**SCOPE OF THE INTEGRITY PROGRAMME**

- Bribes.
- Political contributions.
- Charitable contributions and sponsorships.
- Gifts, hospitality and expenses.
- Interactions with healthcare professionals conducted in a transparent and ethical manner that does not interfere with their independence.

**INTEGRITY PROGRAMME IMPLEMENTATION REQUIREMENTS:**

- Ensuring the existence of an effective Programme for combatting bribery and conflicts of interest carried out consistently with clear lines of authority.
- Extending the Programme to all business activities and relationships.
- Reflecting the company’s commitment to the Programme in all human resources activities.
- Providing appropriate training on the Programme to all employees and business partners.
- Encouraging employees and others to raise concerns and report suspicious circumstances (“whistleblowing”) through secure and accessible channels;
- Interactions with patient organisations conducted in a professional and ethical manner that does not interfere with their independence.
- Interactions with healthcare institutions conducted in a professional and ethical manner that does not interfere with their independence.
- Establishing effective mechanisms for internal and external communication of the Programme.
- Establishing and maintaining an effective system of internal controls to counter bribery and related conflicts of interest.
- Establishing feedback mechanisms and other internal processes supporting the continuous improvement of the Programme.
- Cooperating with relevant authorities in connection with bribery and corruption investigations and prosecutions.