



## GLOBAL DISTRIBUTOR COMPLIANCE TOOLKIT

# INTERACTING WITH HEALTH CARE PROFESSIONALS AND GOVERNMENT OFFICIALS

## CODE OF CONDUCT



### Description

The Code of Conduct establishes fundamental guidance on how to conduct business in compliance with your company’s commitment to ethical and lawful behavior. This Code of Conduct can be used as a sample to formally structure a code of conduct for your company.



### Purpose

The Code of Conduct helps your employees, officers and directors to ensure business is conducted in an ethical, lawful and appropriate manner. Adopting a Code of Conduct provides greater confidence to your business partners and global stake holders.



### Instructions

1. Customize the Code of Conduct according to your company’s needs.
2. Provide the Code of Conduct to all officers, directors, employees (including new employees at time of hiring) and all relevant business partners, such as sub distributors and agents.
3. Ensure employees understand their duties and responsibilities as it relates to your company’s commitment to ethical and lawful conduct.
4. Ensure the Code of Conduct is posted and/or accessible to all employees.
5. Train your employees on the Code of Conduct and keep training records.



### Related Resources



# CODE OF CONDUCT

## Introduction

is committed to maintaining the highest ethical standards in the execution of our business duties while complying with all applicable laws and regulations. This document is not intended to be a substitute for more detailed policies that relate to standards of conduct, if applicable.

reputation is important. employees shall not engage in any misconduct that could jeopardize the Company's reputation, its client, or third-party relationships, as well as avoid situations that have any appearance of impropriety. No bribes should be offered, requested, paid or accepted. *[This paragraph should be customized to your Company's vision, mission and values]*

Company resources should only be used for legitimate business purposes in the best interest of Incidents, risks and issues contrary to this document should be reported to

The Code of Conduct will apply to all officers, directors, employees (including new employees at time of hiring) and all relevant business partners, such as sub distributors and agents.

## Basic Principles

### 1. COMPLIANCE WITH LAWS

will conduct its business and affairs in compliance with all applicable laws, rules and regulations and in accordance with Code of Conduct and its underlying policies and procedures.

### 2. CONFLICT OF INTEREST

A conflict of interest occurs when a person's private interest interferes or appears to interfere in any way with interests and may also arise when the Company, employee, director, or a member of his or her family receives improper benefits because of his or her position within . These situations include, but are not limited to, relationships with government officials, health care professionals, health care organizations, physician owned companies, or any other situation where it may appear that company decisions can be influenced by personal interests or relationships. You should avoid a conflict, or an appearance of a conflict, between your personal interests, your official responsibilities and your Company's interests. Any potential conflict of interest should be declared.

### 3. FAIR DEALING

All employees will deal with 's customers, suppliers, competitors and independent auditors in a fair and transparent way and will not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information or misrepresentation of facts. Even the perception of unlawful conduct should be avoided, including inappropriately disclosing pricing, costs, production, products and services, bidding practices, other nonpublic business matters, and sales territories.

Tenders require a transparent, fair and equal bidding process. must not collaborate with a tendering authority in the creation or interpretation of tender materials or documentation in a way which could compromise fairness of the process.

### 4. PROMOTIONAL ACTIVITIES, MARKETING AND SALES

will represent its products and services accurately and will comply with applicable regulatory and legal requirements including applicable industry codes including governing the marketing and sale of products and services.



## **5. RECORDING AND REPORTING INFORMATION**

\_\_\_\_\_ will record and report all information completely and accurately in the books, records and accounts in a timely manner and in reasonable detail.

## **6. IMPROPER PAYMENTS**

Improper payments mean unlawful or with a corrupt intent.

Payments in cash or kind or in the form of anything of value to government officials with the purpose of obtaining an improper business advantage are considered improper payments and are prohibited.

Improper payments can also be payments of low value intended to expedite or facilitate routine bureaucratic processes.

## **7. INTERACTING WITH HEALTH CARE PROFESSIONALS AND GOVERNMENT OFFICIALS**

Whenever interactions with Government Officials or Healthcare Professionals (HCPs) involve payments, meals, travel, or any other benefit to an HCP, \_\_\_\_\_ will ensure that the benefits are legal under all applicable laws and regulations, supported by a legitimate and documented business need, and allowed under the written agreement.

Any interactions with an HCP/GO must be supported by a legitimate, clearly defined business need and allowed under the written agreement.

\_\_\_\_\_ may only engage HCP/GOs whose expertise and experience are appropriate given the business need.

All financial interactions with HCP/GOs must be consistent with relevant agreements, and compensation for these interactions must be reasonable for the local market.

# **COMPLIANCE**

## **1. ROLES AND RESPONSIBILITIES**

It is every employee's responsibility to understand and comply with the Code of Conduct and to report any potential violation of policy or law, including violations raised by third parties.

## **2. COMMUNICATIONS AND TRAININGS**

Owners, officers, directors and managers must communicate the Code of Conduct to ensure that all employees and relevant business partners understand and comply with the policies herein.

Each employee will receive relevant training and new employees will be trained upon hiring. Employees will be required to confirm in writing that they understand and comply with these policies and will report any violations that comes to their attention.

## **3. REPORTING**

Any violation of the Code of Conduct must be reported immediately to \_\_\_\_\_.

Reporting may be anonymous if allowable by local law and will not be subject to retaliation of any sort.

Failure to comply with the Code of Conduct may result in disciplinary action according to \_\_\_\_\_ policies, up to and including termination of employment, where appropriate.