Conflicts of Interest:

Pharmaceutical, Medical Device and Biotech Industry Relationships

Policy

The relationships between the pharmaceutical, medical device or biotech industries (Medical Industries) and Company and its employees must promote the Company’s Mission and not constitute or appear to constitute a conflict of interest. The intended effect of such relationships may not be promoting the Medical Industries’ products or services.

Guidelines

All relationships with the Medical Industries are expected to be consistent with the Company’s pharmaceutical strategies and clinical and care coordination priorities and alliances. All such Medical Industry relationships must also comply with other Company policies, including the Information Practices, Protecting Information Assets and Confidential Information and Trademarks and Service Marks and Use of Company Names and Endorsements policies.

Consult with your Resources if you have questions.

Compliance Steps

Advisory Committees and Meetings. Before participating in any advisory committees or meetings, get approval from the Company’s [Titles], who will confirm your participation is consistent with company’s strategies and priorities. Be sure you don’t divulge the Company’s strategic and confidential information to the Medical Industries or others and that you comply with the Protection of Information Assets policy.

Company Program Funding. All Medical Industry funding of the Company’s programs and business activities, including research grants, must be approved in advance by the appropriate Business Segment or Corporate Department leader. Funding may not be used to cover operating budget shortfalls or the Company’s customary business activities. The funding may not conflict with the Company’s pharmaceutical management or associated pharmacy benefit management vendor obligations.

Consulting Services and Non-Company Research Programs. Comply with the Avoiding Conflicts of Interest policy before agreeing to be a consultant for a Medical Industry company. If you intend to participate in a research program outside of your employment with Company, in addition to complying with the Avoiding Conflicts of Interest policy, you must receive prior approval from the Company’s [Titles], who will confirm your participation is consistent with the Company’s strategies and priorities.

Continuing Education Programs for Employees. Employees may receive free continuing education programs from the medical industries as long as the program:

- Qualifies for continuing education units under the applicable professional rules
- Is primarily intended to provide balanced educational information
- Does not include marketing or promotional information.

The Business Segment or Corporate Department leader must prior approve the continuing education program. You must comply with the Business Courtesies policy if the program includes any travel or lodging expense reimbursement.
Honoraria Paid to Employees. All activities for which you will receive an honorarium must be approved in advance by your Business Segment or Corporate Department leader. These activities can include advisory services, telephone interviews, focus groups, surveys, etc.

All honoraria you receive as a result of such activities you participate in as a Company representative, must be donated to the [Name]. In order to avoid unintended tax consequences, arrange for the honorarium to be made payable to the [Name].

If the honorarium is for services you provide outside of your employment for Company, you must comply with the Avoiding Conflicts of Interest policy.

Reporting Pharmaceutical Company Funding. In order to allow the Company to track and assess the appropriateness of any funding, sponsorships and other financial assistance received from the Medical Industry, you must respond to all Company requests for information about such payments. This requirement does not include any payments received for services provided by Company, such as clinical trial services.

Sharing Member and Other Data with Industry. You must comply with the Information Practices and Protecting Information Assets policies before providing any member information or company data to the Medical Industry.

Policy Owner:  
Effective Date:  
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Resources

Your supervisor
Sample Approval Request Forms
Legal Services Department
Compliance Hotline