

Recommendations No. 4 to the Pharma Code**Requirements on and behaviour of pharmaceutical companies in connection with events for the professional promotion of medicinal products as well as further education and training of professionals****Initial situation**

National and international events for the professional promotion of medicinal products as well as further education and training of professionals (such as congresses, symposia or similar events of medical professional organisations) are usually held with the support of pharmaceutical companies. The Pharma Code (PC) sets out rules on this matter:

○ **Definition of events:**

Section 13.19 PC defines events as reunions organised by a pharmaceutical company or in its name or financially or otherwise supported by it, such as symposia or congresses, meetings of healthcare professionals, advisory bodies or bodies for the planning of clinical trials or non-interventional investigations or for the training of testers for clinical trials, visits and inspections of research and manufacturing establishments of pharmaceutical companies

Section 31.2 PC defines symposia, congresses and similar, possibly smaller, events as recognized means of disseminating knowledge and experience about medicinal products and treatments and on the further training and advanced training of health care professionals.

○ **General obligations of companies on the occasion of events:**

Section 33 PC determines the points which must be respected by companies in the pharmaceutical industry that provide financial or other support for such events. This includes the contractual rules and the clear identifiability of the particular companies which support an event.

○ **Obligations of the companies in connection with professional promotion and information at events with national and international participation:**

Section 2 PC defines the requirements for advertising and information about medicinal products to health care professionals.

Section 27 PC stipulates what the pharmaceutical companies must pay attention to when they use information material for medicinal products at events with international participation.

The PC sets out principles governing the conduct of companies and of their personnel on the occasion of events for the professional promotion of medicinal products as well as further education and training of professionals. The conduct at such events shapes the image and reputation of individual pharmaceutical companies and their representatives as well as the pharmaceutical industry as a whole. The way in which the personnel taking part in the events conduct themselves is guided in each individual case by the rules of conduct of the particular company concerned. The PC contains a number of rules of conduct and other requirements which must be observed. The following recommendations implement these rules and – where possible – rewrite them in more concrete terms to simplify their applicability in individual cases.

Recommendations

The Code Secretariat recommends compliance by pharmaceutical companies with the following rules of conduct on the occasion of events held in Switzerland for the professional promotion of medicinal products as well as further education and training of professionals, which are generally organised under the responsibility of professional organisations:

1. Conduct of pharmaceutical companies in supporting events for the professional promotion of medicinal products and further education and training of professionals

- 1.1 Companies may not support any congresses, symposia or similar events whose programme includes leisure, cultural, sport or other entertainment opportunities and events of a non-professional or non-scientific nature. Congress participants are at liberty to procure such services as they may need independently from the congress and for their own account from the appropriate local service providers.
- 1.2 Companies may not offer, implement or cause to be implemented any leisure, cultural, sport or other entertainment offerings and events of a non-professional nature in connection with congresses, symposia or similar events which are unrelated to the topic of the event and to its professional and scientific programme. The following in particular are prohibited because they are critical in this regard:
 - 1.1.1 Arranging or booking leisure, cultural, sport or other entertainment including excursions to shopping centres, factory outlets and so forth.
 - 1.1.2 Offers of organised leisure travel, weekend stays and so forth before or after the congress, the symposium or the similar events.
 - 1.1.3 Offers by third parties (e.g. manufacturers of, or dealers, in vehicles, sports equipment and so forth) to effect promotion for their products which are unrelated to the congress (e.g. by providing a shuttle service, test drives and so forth).
- 1.3 The offers made by companies on their information stands or otherwise on the congress site which extend beyond professional information and promotion (catering, distribution of information- and training materials or of writing implements and pads) must be of modest value and compliant with the customary practice. The offer on the information stands and their design should be appropriate for the congress and its professional-scientific organization.
- 1.4 Competitions or prize awards may be offered, but they must relate to the theme of the information stand and be generally appropriate to the professional and scientific congress environment. The prizes that are awarded should be of modest value and have to meet the requirements of the prohibition of gifts (especially Section 15.3.1 PC).
- 1.5 Writing implements and pads of modest value may not bear any references to the pharmaceutical company or to particular medicinal products (especially Section 15.3.2 PC).
- 1.6 The company must not reward participants to attend their information stand.

- 1.7 Alcohol is not to be served on the information stands. The catering provided by the company either there or elsewhere on the congress site should be confined to small refreshments, such as non-alcoholic beverages, snacks and similar small culinary items.
- 1.8 If the congress organiser offers catering opportunities to participants as part of a restaurant operation on the congress site or in its environs, the pharmaceutical companies must not compete with this offering.
- 1.9 Personnel of a pharmaceutical company must adopt appropriate conduct and dress on the information stand and in the further framework of the congress, consistent with its professional and scientific environment.
- 1.10 Personnel of a pharmaceutical company should behave fairly and properly in relation to the other companies which are taking part in a congress or symposium or a similar event.

2. General requirements for the locations of events for the professional promotion of medicinal products and further education and training of professionals

Events should take place in venues that are appropriate and beneficial to the main purpose. Their selection should be based solely on their suitability in terms of space and infrastructure in order to fulfil the main purpose. Venues that are renowned for their entertainment facilities or are considered extravagant are to be avoided. The following requirements should therefore be observed:

- 2.1 A location in combination with an exclusive venue (e.g. a renowned 5-star hotel) must be assessed very critically.
- 2.2 A location known for its tourist attraction (e.g. Davos, Interlaken, Grindelwald, Lugano etc.) can then be secondary in itself as long as it is not the reason for the event and there are other plausible reasons for holding the event at this location (such as congress infrastructure or scientific facilities). The location should therefore never be advertised specifically.
- 2.3 The event infrastructure must be suitable throughout. 3 to 4-star hotels are to be preferred for both implementation and accommodation.
- 2.4 The programme must be scientifically demanding and tightly organised. Leisure activities privately organised and financed by specialists should, if possible, only be possible at off-peak hours.
- 2.5 For any credits awarded, the physical presence at the event should be checked in an appropriate manner.

3. General requirements for satellite events and similar meetings on the occasion of congresses and similar events

- 3.1 Satellite events and similar meetings must be part of the official programme of a congress or of a similar event.

- 3.2 The companies will obtain approval from the appropriate entity (congress management or responsible scientific body) for the title, programme and description of satellite events.
- 3.3 The title, programme and description of the satellite events must be informative and contain no promotion for medicinal products. They should enable participants to quickly identify the main objective of the satellite symposium or similar meetings.
- 3.4 Satellite events should be led by a health care professional who is independent of the company (e.g. a representative of the organising professional society). Companies must not arrange competing events held in parallel with the congress programme.
- 3.5 The speakers are expected to be neutral and controversial on the topic of the satellite symposia. The presentations should meet scientific requirements.
- 3.6 The provision of information in the above-mentioned sense is reserved for speakers invited by the pharmaceutical company and independent of it, as well as for the specialist staff of the medical service or the research department of the pharmaceutical company. The speakers shall indicate their interests in an appropriate manner at the beginning of their presentation.
- 3.7 Pharmaceutical companies can provide factual information at satellite symposia or similar events on new medicinal products, indications etc. which have not (yet) been authorised in Switzerland.
- 3.8 In the case of such information, it must be pointed out in an appropriate manner at the beginning of their presentation that Swissmedic has not yet authorised this medicinal product or the new indication, possible use, dosage, dosage form or packaging.
- 3.9 Information activities at satellite events must be separated physically and also in other ways from promotional activities at congresses, symposia and similar events.
- 3.10 No advertising of medicinal products will be permitted on the premises of satellite symposia or similar events, in order to emphasise the informative character of the event.
- 3.11 Marketing and sales personnel may be present at satellite symposia or similar meetings; they may perform only subsidiary functions (e.g. briefing, distribution of microphones) but may not take part in the discussion.

4. Information material distributed at congresses or similar events held in Switzerland at which international participation is expected

- 4.1 Congresses or similar events held in Switzerland may also have international participation.
- 4.2 Information material distributed at such congresses or similar events may refer to medicinal products authorised in other countries but not in Switzerland or under other conditions.

- 4.3 Such information material must be accompanied by the following statements:
- 4.3.1 Indication of the countries in which the medicinal product concerned is authorised and that the medicinal product concerned is not authorised in Switzerland or is authorised under other conditions;
 - 4.3.2 Reference to possible differences in the approval requirements and the state-approved technical information (indications, warnings, etc.) in the country or countries in which the drug(s) concerned is/are approved.

The Code Secretariat considers the presence at a congress as a coherent promotion measure. However, roll-ups or advertising panels do not need to quote compendious expert information or references. This information should however be available at the stand – at least electronically.

Congresses and similar events often report on the latest scientific data on medicinal products. This includes medicines that have not yet been approved or new indications for approved medicines. Ideally, information about these is provided at a separate location on the stand. Anything that could be interpreted by the information addressee as a direct or indirect recommendation or incentive to off-label use should be avoided. In case of doubt, an action with advertising character is to be assumed.