

Building Relationships While Maintaining Compliance

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What type of relationships do we have to build?

Internally

- ✓ Be positioned as Business enabler within Commercial /Marketing teams
- ✓ While looking for Compliance business partners such as Medical, Regulatory, Public Affairs, etc.

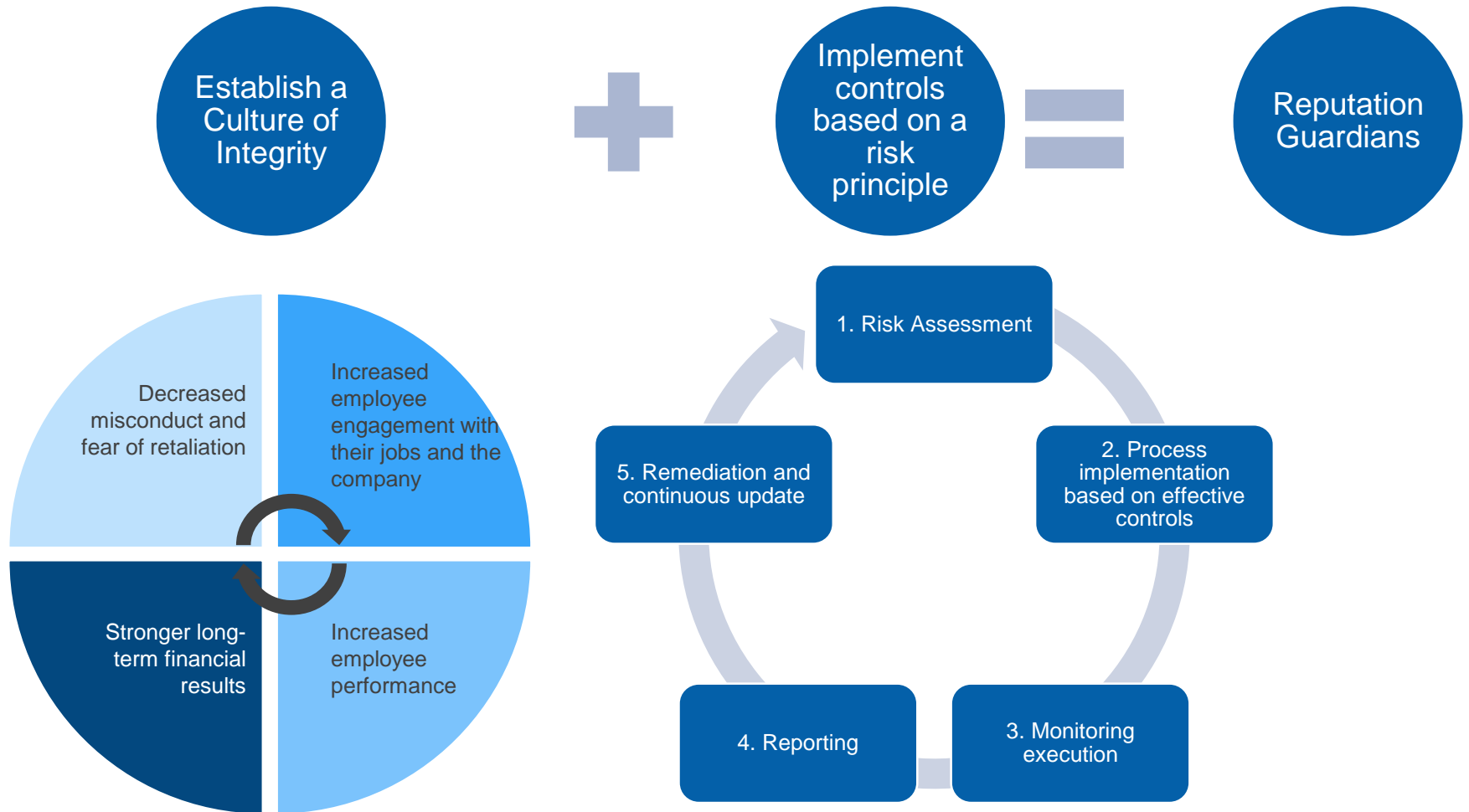
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Externally

Support the business to meet the expectations of our main health related stakeholders:

- ✓ HCPs
- ✓ Patients/Patient Groups
- ✓ Payors
- ✓ Pharmacies

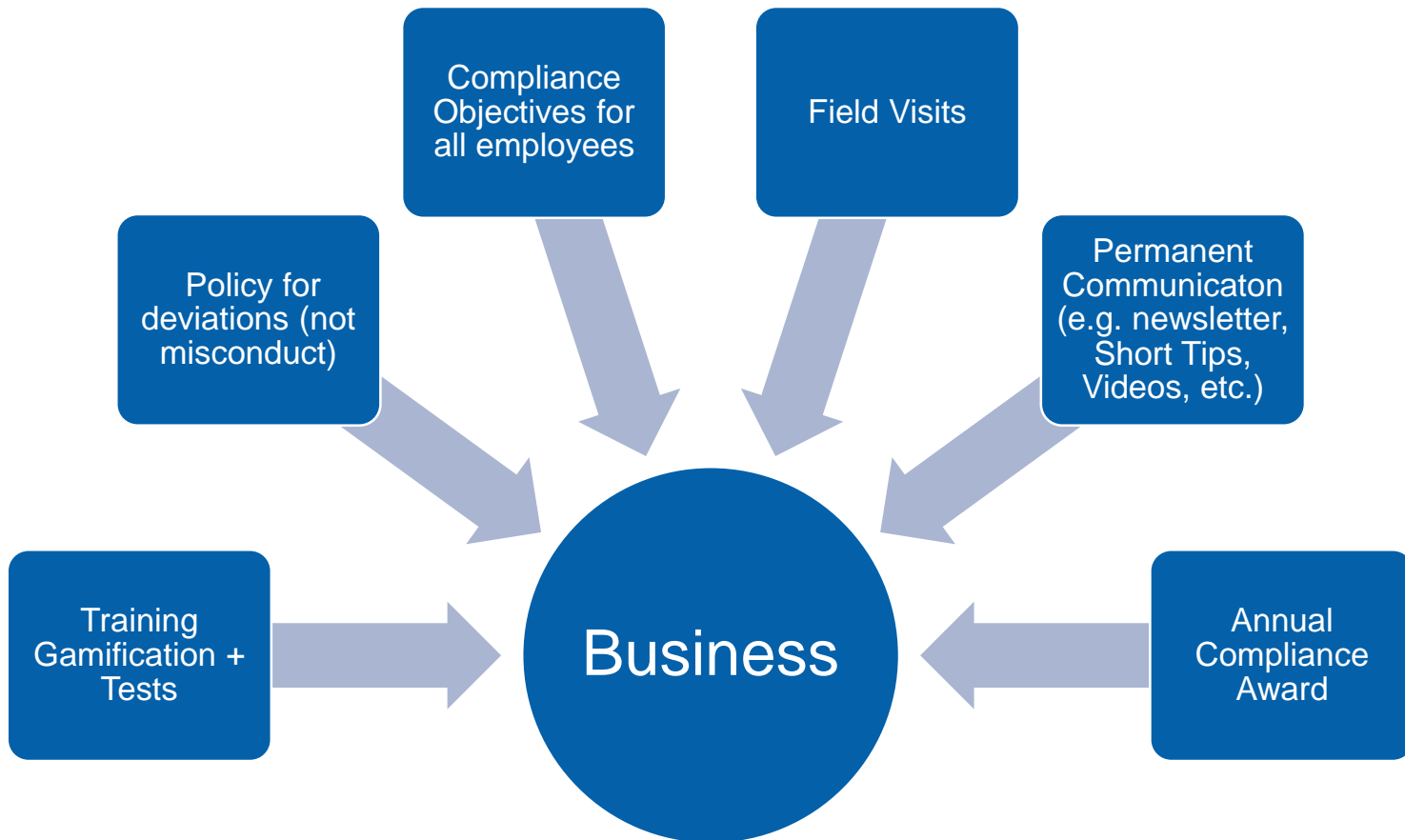
Why do we have to build such internal relationships?



Source: CEB

Building relationships with Commercial/Business people

Key activities implemented



Building relationships with Commercial/Business people

Key activities implemented - Examples



¡No permita que a Ud. le pase lo mismo!

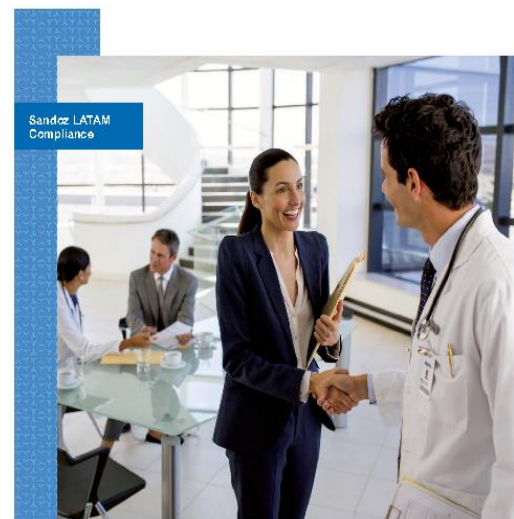
Consejo del trimestre: Comidas con médicos

Contexto:

Durante recientes revisiones efectuadas por el área de Compliance, sobre el proceso de Rendición de Gastos, se identificaron varias observaciones relacionadas con la hospitalidad y comidas ofrecida a los médicos.

Recordatorio:

- La hospitalidad provista a los médicos debe estar en línea con la regulación local y debe ser modesta y secundaria al objetivo del evento.
- La hospitalidad solo puede ser provista si es razonablemente necesaria y está justificada.
- Se debe respetar los montos máximos monetarios establecidos en las políticas locales.
- En todos los gastos, se deberá detallar claramente el objetivo de la comida, nombre de los participantes, y nombre del evento si aplica.
- Se debe considerar el monto máximo de participantes de las comidas ya que por política local de SP3, puede ser que considere como Evento de Pequeña/Baja Escala con lo cual puede ser que requiera alguna aprobación previa.
- Aquellas comidas con médicos de las cuales participen más de 1 asociado Sandoz, debe siempre ser abonada por el asociado con mayor nivel jerárquico local.
- Todo gasto que carezca de comprobante será descontado de la rendición correspondiente del empleado en cuestión.
- Las comidas con médicos deben ser efectuadas en lugares apropiados y adecuados



LATAM Compliance Newsletter

| Versão N° 2 - Novembro 2016

Bem-vindos ao segundo Newsletter de Compliance LATAM através do qual vocês serão informados das principais novidades e iniciativas relevantes aos colaboradores da região LATAM.

SANDOZ a Novartis

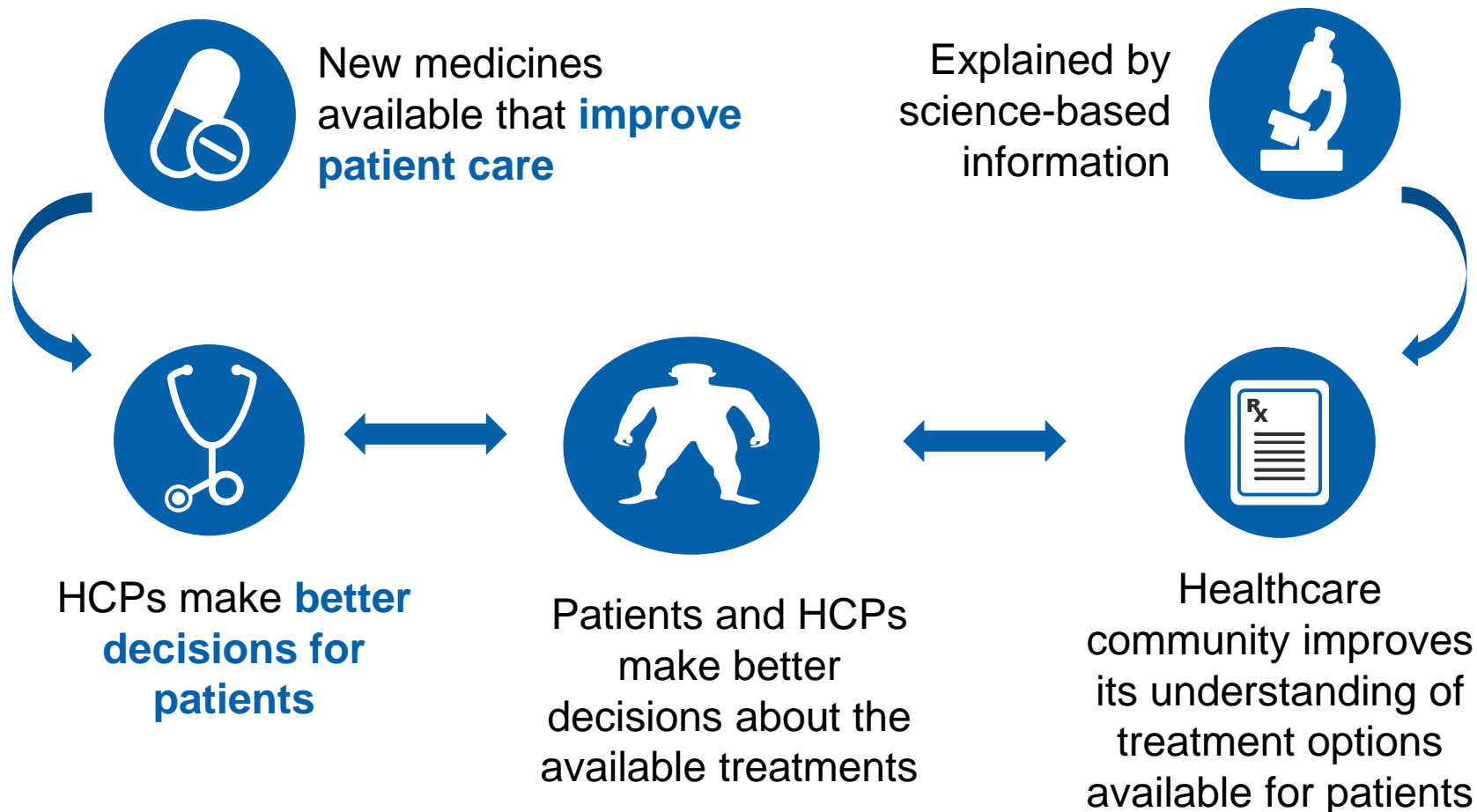
SANDOZ A Novartis Division

Building relationships with Top and middle Management

Key activities implemented

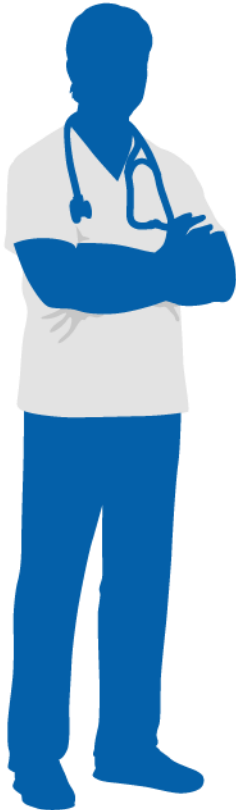


Why do we have to build such external relationships?



Building relationships with HCPs

Funding attendance to Events



Fund only provided to “active” participants



Events focused only on Medical education (e.g. Preceptorships)



Don't organize or fund events at venues that are, or that can be perceived, as touristic



Have adequate supporting documentation (detailed list of participants, itemized billing of meals consumption & hotel, etc.)



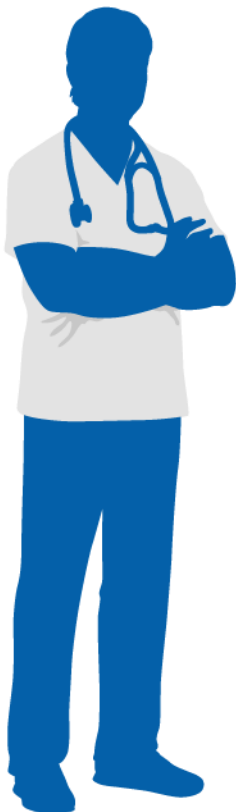
Communicate our rules of the funding to HCPs prior to the event



Don't fund touristic/entertainment/leisure activities

Building relationships with HCPs

Engagements



Fees based on Fair Market Value developed on an objective criteria and based on market analysis



Selection process lead by non-commercial functions



Have a process to identify Public Officials



Ask for Conflict of Interest disclosure



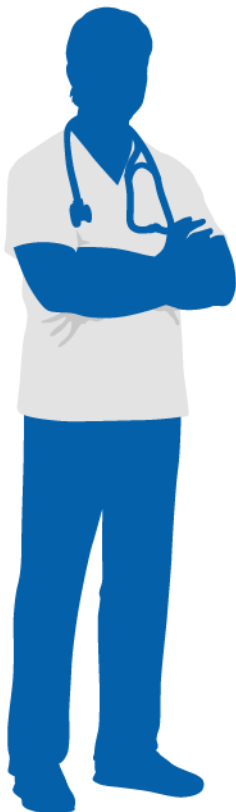
Define a reasonable cap of engagements



Don't consider the engagement as a method of building loyalty, or maintaining or strengthening a relationship with an HCP.

Building relationships with HCPs

Gifts and Samples



Provide items which have a **real and direct patient benefit**



Provide items which do not offset routine business practices



Don't provide cash or cash equivalents



Don't provide items for HCPs personal benefit



Provide a **reasonable amount** of samples per HCP



Have a proper tracking of samples from the company until HCPs

Building relationships with Patients

Provide materials containing information enabling patients to improve their compliance with the treatment and/or their disease understanding



Support Patient Groups in activities for disease state awareness/ Education, psycho-social support during diagnosis and/or treatment



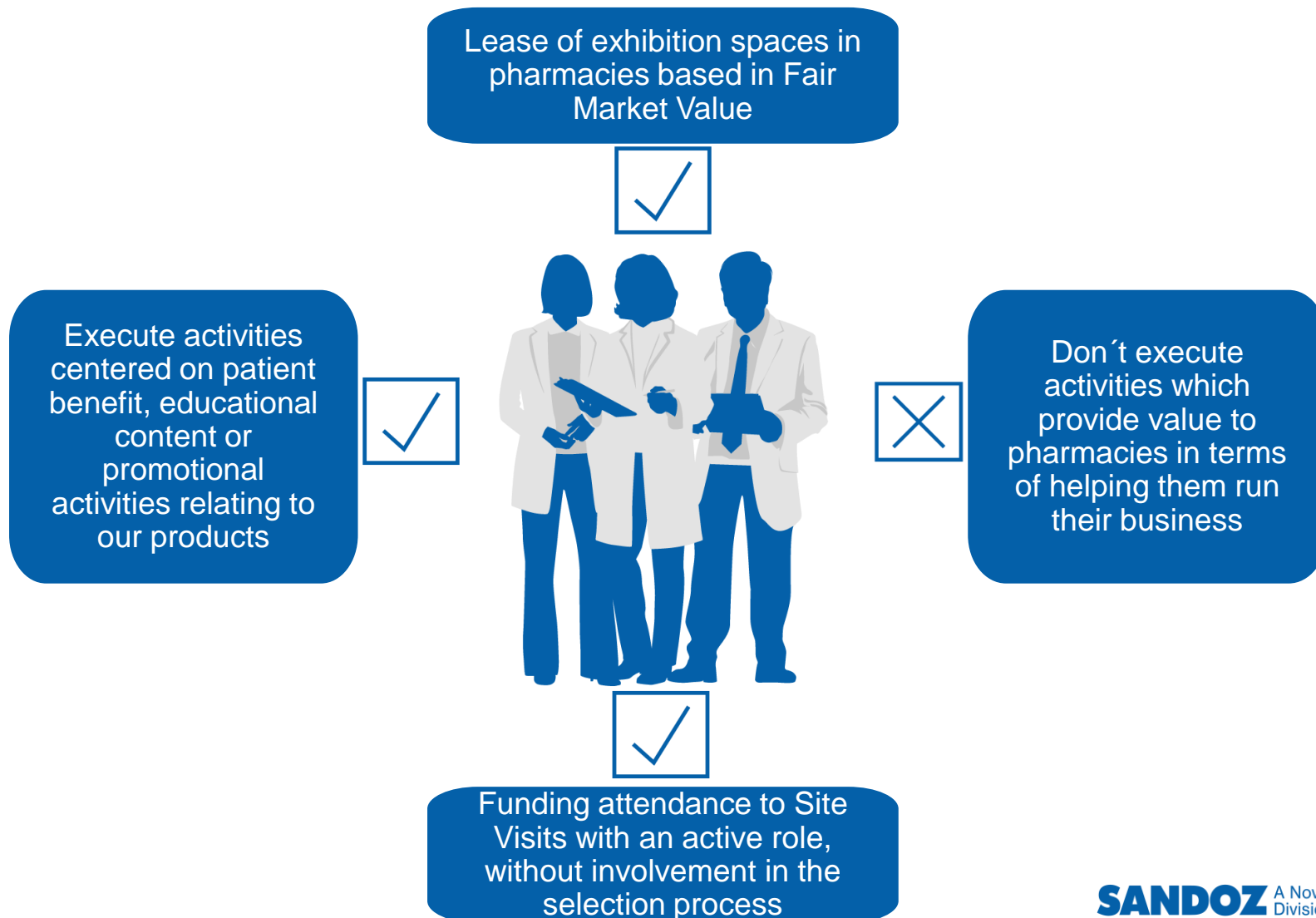
Careful should be taken with these activities to not be and not be perceived as promotional. Also Data privacy requirements are applicable.



Only provide items which support patients in the administration of their treatment or management of their medical condition



Building relationships with Pharmacies



Building relationships with Payors



Funding to trainings which focus on a topic relevant for the pharma industry as a whole and therefore other companies will benefit as well



Don't choose the persons who would attend. The attending person is nominated by his/her superior



Analyze potential conflicts of interest and address them



Can be engaged as Speakers or members of Advisory Boards.



Based on a contract with a FMV. Expertise and background should be documented.



Seek a written confirmation by the institution that he/she is eligible to receive honoraria or be paid the travel/accommodation expenses.



Key take-aways messages

- Be balanced between internal work and external relationships
- Know your people
- Understand your market, your business and your local/internal associated risks.
- Have clear and realistic policies/controls;
- Train your people based on real examples, explaining the WHY behind your rules and use innovative tools
- Work on the message about compliance as a competitive advantage at all levels, internal and externally.
- Leave the desk.Go to the field!

Think beyond

- Are we thinking seriously on the real patient benefit when we define our internal rules?
- Which can be the new stakeholders that we would have to build new relationships?
- How are we controlling activities performed by our Third parties? Can this trigger small and local companies to “play” with the same rules?
- In our region, how can we deal with “personal contacts” that are a big part of our culture?

Questions

Thank you