

Implementing Global Codes of Conduct at AstraZeneca

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Facts about AstraZeneca

- Operates in over 100 countries, with over 67,000 employees. Sales in 2007 of \$29.6 billion; R&D spend of \$5 billion
- Focused on six therapy areas: cancer, cardiovascular, gastrointestinal, infection, neuroscience and respiratory & inflammation
- Product portfolio includes *Arimidex* (cancer), *Crestor* (cardiovascular), *Nexium* (gastrointestinal disease), *Seroquel* (schizophrenia and bipolar disorder) and *Symbicort* (asthma and chronic obstructive pulmonary disease)



Our Approach to Code Compliance

- Simplify the high-level policy framework
- Address core ethical and legal principles that should apply regardless of jurisdiction in the Global Code of Conduct and Global Policies
- Allow for local variance in practice to the extent consistent with both local codes and the Global Policy framework



Our new Global Code of Conduct

- Launched to all AstraZeneca employees this month
- Intended to embody core high-level principles in key risk areas
- Clear, concise language used
- Translated into over 40 languages
- Training to roll out this year to all AZ employees





SECTIONS OF THE CODE

- Patient Safety and Benefit
- Research and Development Ethics
- Providing Information about our Products
- Interactions with Healthcare Professionals and Organisations
- Preventing Bribery and Corruption
- Employment Principles
- Safety, Health and the Environment
- Public Policy and Political Activities
- Community Support, Product Donations and Patient Group Support
- Protecting Personal Information
- Avoiding Conflict of Interest
- Protecting Company Property and Resources
- Communications, Disclosures and Records
- Insider trading and Confidential Information
- Competition and Anti-Trust laws
- Trade Controls



RAISING A CONCERN

- **Employees have a duty to report a situation that appears to be in breach of the Code of Conduct**
- **Anyone who raises a possible breach in good faith will be supported by management and will not be subject to retaliation**
- **Any act or threat of retaliation will itself be considered a serious violation of the Code of Conduct**
- **Several reporting tools are listed in the Code and on www.AZethics.com**





Our Policy Framework

- **Global Code of Conduct**
- **Global Policies (currently in revision)**
- **Functional codes/policies and country-level codes/policies**
- **Analogous to external code framework—Global (IFPMA), regional (e.g., EFPIA) and local (e.g., ABPI, PhRMA)**



International Sales and Marketing Code Compliance Framework

- **High level Code adopted by AstraZeneca International Sales and Marketing Organisation (ISMO) covering all countries outside of North America**
- **Local countries required to adopt codes modelled on the ISMO code that are adapted to local requirements, but consistent with the high-level principles of the ISMO code**



Sometimes several codes may apply

Codes

Regulations

National Industry Code

Code case reports and advice

National pharmaceutical advertising laws & regulations

National Company Code and policies

Other national legislation e.g. advertising, fraud, gaming, privacy, trade marks etc.

National Health Professionals' Codes

Precedent e.g. inter-company challenges

Regulatory body advice, guidance documents, case reports etc

Institution policies e.g. hospitals, learned societies, publishers

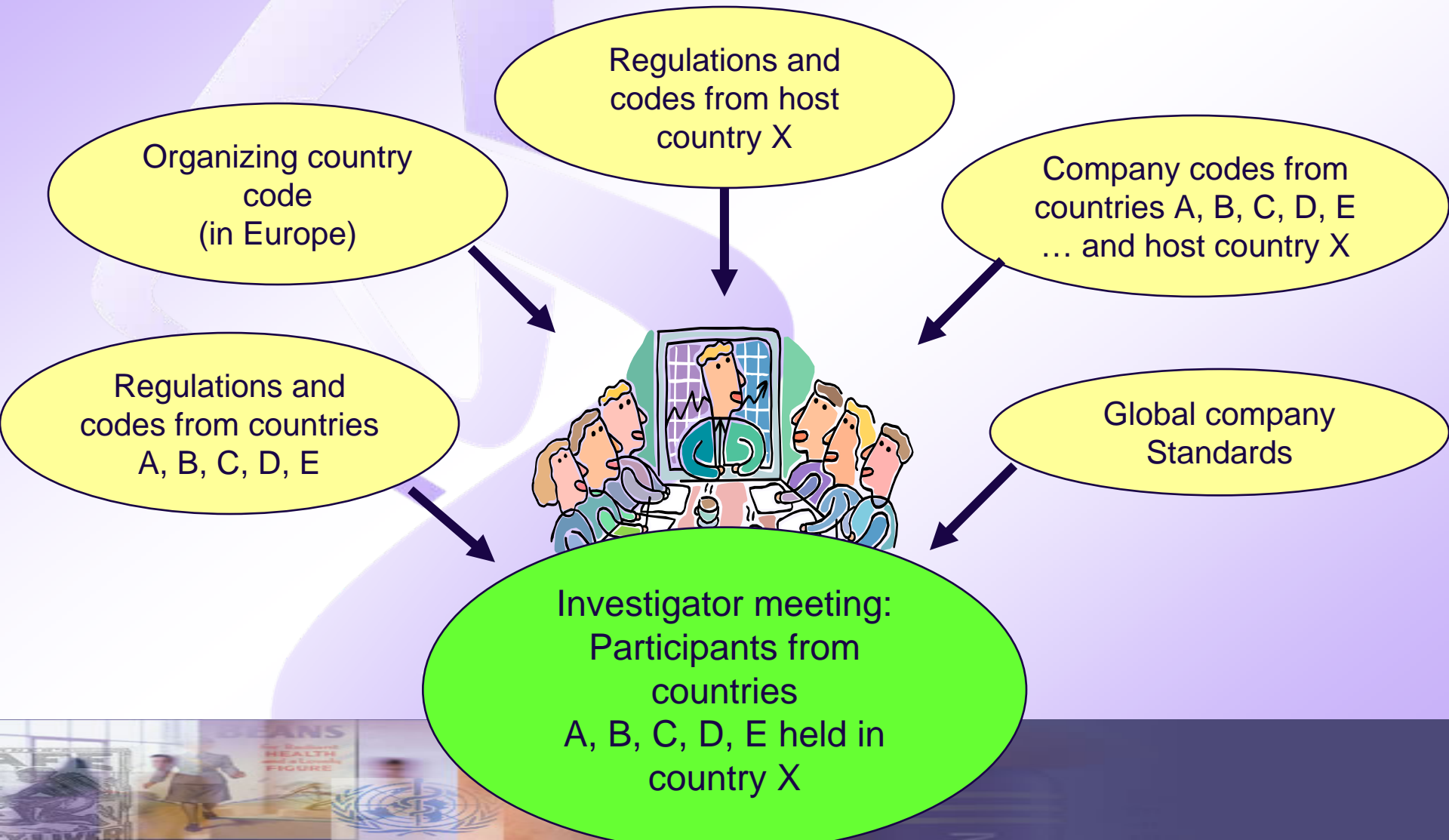
.. And other countries codes and regulations

Industry/Health Professional/Employers agreements

.. And International codes and regulations



Multi-country events: What limits apply to hotel accommodation?



How to Cope

- Cover only core principles globally, allowing for appropriate local variance to address local requirements
- Ensure integrated compliance framework to address cross-border and cross-functional issues
- Provide clear training at global and local level to ensure relevant employees are knowledgeable regarding global and local codes and have certified that they will comply with them
- Establish clear business accountability for compliance at global, regional and local levels
- Establish effective monitoring and auditing programmes to check compliance
- Establish effective reporting mechanisms to analyse trends and monitor effectiveness of compliance efforts

