

7th International Pharmaceutical Compliance Congress and Best Practices Forum

Vision and Overview

Madrid -- May 21st, 2013

Dominique Laymand

Vice President, EMEA Compliance & Ethics
Bristol Myers Squibb

2012-2013 – Some external key trends

- ◆ **Sustained scrutiny on Healthcare sector**
- ◆ **Codes revision (EFPIA, IFPMA, MEA, Country codes, e.g.: South Africa...)**
- ◆ **Continued scrutiny on Healthcare sector with new regulations and trends or new topics reinforced on e.g.:**
 - **Anti-corruption regulations (UK, Russia, China), revised FCPA guidance, OECD report, etc.**
 - **Transparency (HCPs payments disclosures) in US, Europe, Asia**
 - **Conflict of interests**
- ◆ **Third Parties Compliance Focus**
- ◆ **Challenging external economical environment**
- ◆ **Healthcare companies: reorganization, resources decreasing, adaptation of Business Model, etc.**

Tone at the Top / Key component of an effective Compliance & Ethics program

- ◆ **Tone At The Top refers to how an organization's leadership creates the tone at the top - an ethical (or unethical) atmosphere in the workplace. Management's tone has a trickle-down effect on employees. If top managers uphold ethics and integrity so will employees. But if upper management appears unconcerned with ethics and focuses solely on the bottom line, employees will be more prone to commit fraud and feel that ethical conduct isn't a priority. In short, employees will follow the examples of their bosses**
- ◆ **The core of an effective compliance & ethics program is a clear, demonstrable and unambiguous commitment from senior management**
- ◆ **Tone At the Top is key for driving a strong ethical culture in an organization**

Tone at the Top / Key component of an effective Compliance & Ethics program (ct'd)

- ◆ **Must not amount to « lip service » if actions contradict compliance statements i.e., ‘talk the walk’ and ‘walk the talk’**
- ◆ **Must convey systematic message that:**
 - **Compliance and ethics are matters of company culture and not only a legal obligation**
 - **Breaches are not acceptable as business practices and will not be tolerated**
 - **Speaking up in cases of concerns is a key element of the company’s culture**
- ◆ **Under some countries’ regulations, breach by senior management can be an aggravating factor**

The Priceless Ingredient



The PRICELESS INGREDIENT

In the City of Bagdad lived Hakeem the Wise One, and many people went to him for counsel, which he gave freely to all, asking nothing in return.

There came to him a young man, who had spent much but got little, and said: "Tell me, Wise One, what shall I do to receive the most for that which I spend?"

Hakeem answered: "A thing that is bought or sold has no value unless it contains that which cannot be bought or sold— Seek for the Priceless Ingredient."

"But, what is the Priceless Ingredient?" asked the young man.

Spoke the Wise One: "We are, the Priceless Ingredient of every product is the Honor and Integrity of its maker. Consider this name before you buy."

Three words of this old tale—"The Priceless Ingredient"—tell the story of the House of Squibb, revealing the secret of its service and success.

H. W. Squibb & Sons was founded in 1859 by Dr. Edward R. Squibb, a physician and chemist of high principles and ideals. He was inspired, not by hope of financial gain (for he had money enough for all his needs), but by professional duty and personal honor. His aim was to set a new and higher standard in chemical and pharmaceutical manufacture, by making products of greater purity than had yet been known.

Within three years the Squibb Laboratories had attained a position of leadership. In 1861 the Government of the United States turned confidently to Squibb for products needed for a million men in our Civil War. That was sixty years ago. The reputation so early won, the House of Squibb holds today inviolate and values far above profits.

In 1917, as in 1861, the United States Government again turned confidently to Squibb for products needed for millions of men in the World War, and after the War, conferred upon the House of Squibb the Award for Distinguished Service.

For more than half a century the name Squibb has been recognized as full guaranty of skill, knowledge and honor in the manufacture of chemical and pharmaceutical products made exclusively for the medical profession and used only by the physician and the surgeon.

The name Squibb or HOUSEHOLD PRODUCTS is equally valued as positive assurance of true purity and reliability.

<p>Squibb's Ammonium of Salt—essentially pure, contains without trace iron.</p> <p>Squibb's Barium Sulphate—free from impurities. Free from lead or iron.</p> <p>Squibb's Boric Acid—Pharmaceutical quality purified product free from arsenic, sodium and iron.</p> <p>Squibb's Glycerol of Magnesium—free from arsenic, iron and lead.</p> <p>Squibb's Cod Liver Oil—refined from Norwegian fish, free from iron and arsenic.</p> <p>Squibb's Glass—manufactured from English material, free from iron and arsenic.</p> <p>Squibb's Glycerol of Nitrogen—refined for medicinal and surgical use. Quick melting. Is soluble in oil.</p> <p>Made by reliable European factories, in original sealed packages.</p> <p>The "Priceless Ingredient" of every product is the Honor and Integrity of its maker.</p>	<p>Squibb's Zinc Sulphate and perfectly soluble. Not powder for dusting, granules form for solution.</p> <p>Squibb's Zinc Oxide—open for use, used in some countries.</p> <p>Squibb's Zinc Oxide—open for use, used in some countries.</p> <p>Squibb's Magnesium Sulphate—Manufactured from English material, free from iron and arsenic.</p> <p>Squibb's Magnesium Sulphate—Manufactured from English material, free from iron and arsenic.</p> <p>Squibb's Magnesium Sulphate—Manufactured from English material, free from iron and arsenic.</p> <p>Squibb's Cold Creams—supplies preparation of certain complexion for the use of the skin.</p>
---	---



SQUIBB

In the City of Bagdad lived Hakeem the Wise One, and many people went to him for counsel, which he gave freely to all, asking nothing in return.

There came to him a young man who had spent much but got little, and said: "Tell me, Wise One, what shall I do to receive the most for that which I spend?"

Hakeem answered, "A thing that is bought or sold has no value unless it contains that which cannot be bought or sold. Look for the Priceless Ingredient". "But what is the Priceless Ingredient?", asked the young man.

Spoke then the Wise One: "My son, the Priceless Ingredient of every product is the Honor and Integrity of its maker. Consider this name before you buy".

E.R. Squibb & Sons - 1921