### 7<sup>th</sup> International Pharmaceutical Compliance Congress and Best Practices Forum Vision and Overview

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#### 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.

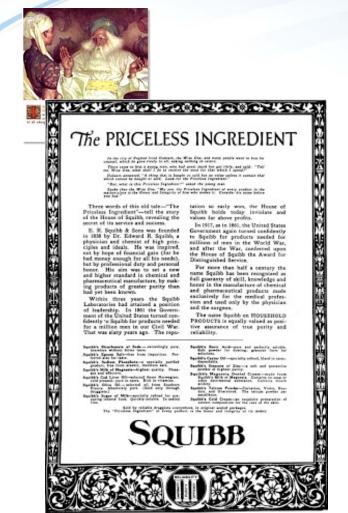
# Tone at the Top / Key component of an effective Compliance & Ethics program

- ◆ 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



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".

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