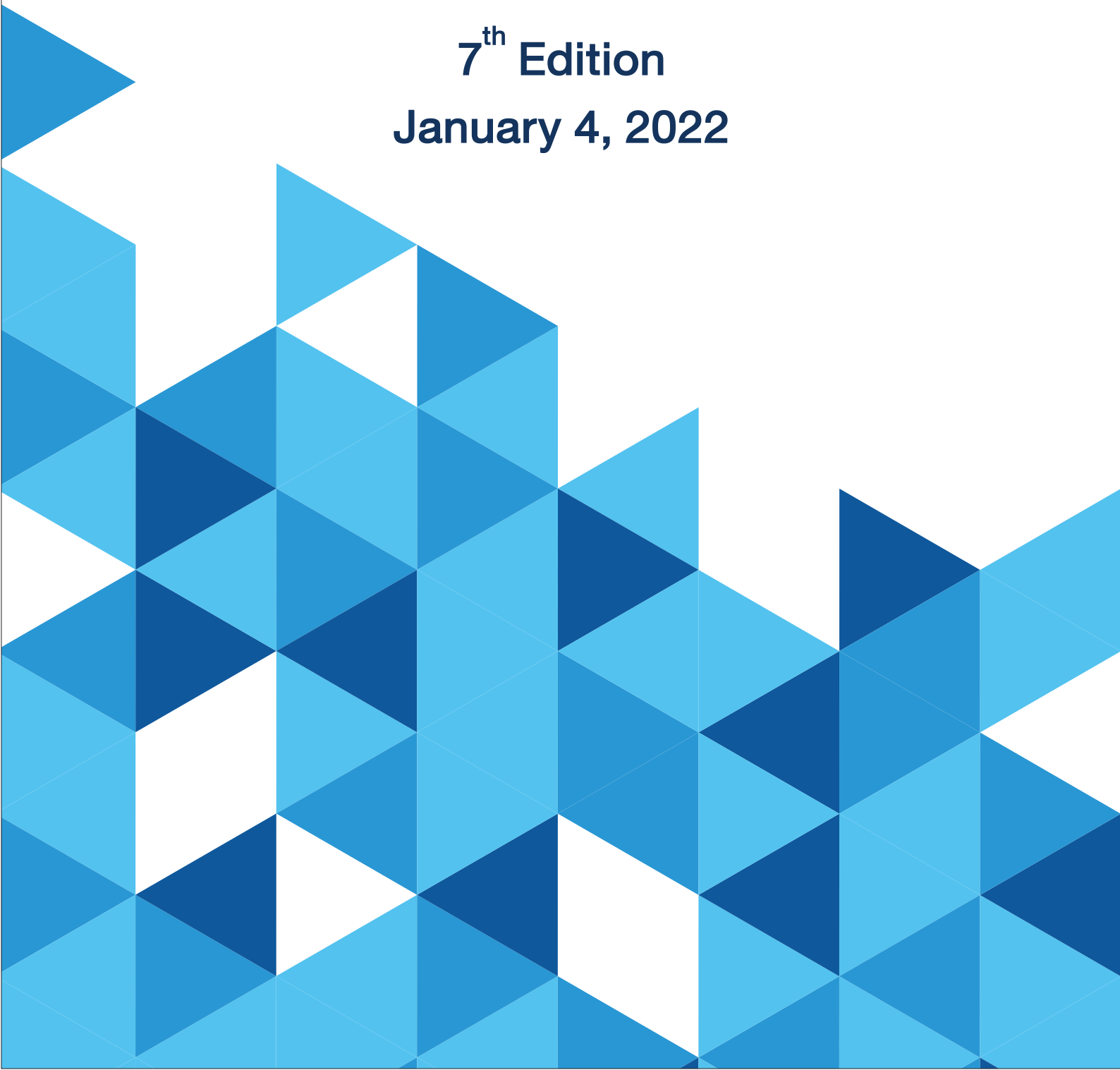




BIOVALYS
Code of Conduct
7th Edition
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Objective and intention of Biovalys Co.,Ltd.

Biovalys Co.,Ltd. is dedicated to conducting business through good business ethics for transparency and confidence in dealing with business partner, to create a good co-operation with government in order to prevent corruption and leverage country development to international level.

Scope

BVL Code of Conduct includes standards for the ethical promotion of pharmaceutical products to healthcare professionals and helps ensure the interactions with healthcare professionals, medical institutes and patient organizations, in case the promotion is approved through patients or public, company must comply with laws, regulations and code of conduct in country.

1.) Definitions

- 1.1 **“Promotion”** means activities undertaken, organized or sponsored by company with the objective to encourage the prescribing product, through all methods of communications, including the internet.
- “Promotion”** includes the activities of company representatives and all other aspects of sales promotion in whatever form they may occur. Examples of promotion include but are not limited to: product information presented in any form; public relation activities; advertising via electronic media, journal/print and direct mail; participation in exhibitions; use of audio cassettes, films, records, slides, tapes and video recordings; the use of any other data storage and viewing devices reproduced on television; visual display units; and the provision of samples.
- “Promotion”** does not extend to replies made in response to enquiries from particular doctors or replies in response to a specific communication, including letters published in a medical journal.
- 1.2 **“Product”** means any vaccine or biological product intended for use in the diagnosis, cure, mitigation, treatment or prevention of disease in humans, or to affect the structure or any function of the human body, which is promoted and advertised to the healthcare professionals rather than directly to the lay public, including medical equipment that is directly associated with the product.
- 1.3 **“Healthcare professional”** means any member of the medical, dental, pharmacy or nursing professions or any other person who in the course of his or her professional activities may prescribe, recommend, purchase, supply, or administer a pharmaceutical product and those as defined under Drugs Act of 1967, 1979, 1987 and subsequently amended.
- 1.4 **“Company representative”** means a company employee whose duties comprise or include calling upon members of the healthcare profession to provide them with information or any other purposes about the company’s products/services.
- 1.5 **“Certified package insert”** means comprehensive product information included in each product pack as approved by the Food and Drug Administration (FDA) of the Ministry of Public Health.
- 1.6 **“Patient organization”** means typically a not-for-profit institution that primarily represents the interests and needs of patients, their families and/or caregivers.
- 1.7 **“Medical institution”** means typically an organization that is comprised of healthcare professionals or that provides healthcare or conducts healthcare research.

2.) Principles

- 2.1 Healthcare and well-being of patients is the first priority of company.
- 2.2 Interaction with stakeholders must be ethical, appropriate and professional all time. Nothing should be offered or provided by company in a manner or on conditions that would have an inappropriate influence.
- 2.3 Company shall comply with local laws and regulations.
- 2.4 Company will conform to high standards of quality, safety and efficacy as determined by regulatory authorities. In all cases, all relevant laws, local regulations and industry codes must be observed and company has responsibility to local requirements in advance of preparing promotional materials or events.
- 2.5 Only products registered in Thailand should be promoted to healthcare professionals. While promoting product, the information should be accurate, balanced, and scientifically valid and presented in such a way as to conform not only to legal requirements but also to high ethical standards and to be in good taste. Claims should not be stronger than scientific evidence warrants, and every effort should be made to avoid ambiguity and making off-label product claims.
- 2.6 Prohibition of payment to welfare fund, foundation or other similar bank account of government hospitals/institutes if associated to purchase of those hospitals/institutes.
- 2.7 Information in promotional material should be based on an up-to-date evaluation of evidence that is scientifically valid and approved by Thai FDA.

- 2.8 Clinical research or academic research of company must be conducted with an educational purpose to develop knowledge of patient's benefit and medical scientific advancement. Company is dedicated to transparency of clinical research that industry support to patient.
- 2.9 Privacy and personal information of patients must be respected.
- 2.10 It is the responsibility of company to ensure that all relevant personnel are adequately trained and possess sufficient medical and technical knowledge to present information of company products in an accurate, responsible and ethical manner, they must also feedback to company, from contacts in the medical and allied professions, information which they receive on the use of products and particularly reports of adverse event.
- 2.11 All trademarks duly registered in the Kingdom of Thailand must be respected and copyrights observed.
- 2.12 Company must not seek benefit from the limited protection provided to pharmaceutical patents in the Kingdom of Thailand, at the expense of the discoverer, or his licensee, who remains the rightful owner of such property in the originating country.
- 2.13 Company should establish and maintain appropriate procedures to ensure full compliance with codes to review and monitor all promotion activities and materials.
- 2.14 Donations to institutes must be wholeheartedly for the sole purpose of humanity support and/or non-scientific purpose and with no expectation on business return.
- 2.15 This Code of Conduct is to be applied in the spirit as well as in the letter.

3.) Promotional Practices

- 3.1 Promotional practices should never be such as to bring discredit upon the pharmaceutical industry. Promotional practices utilized should be able to withstand public scrutiny.
- 3.2 Information about the product furnished to the healthcare professionals should be current, accurate, balanced and should not be misleading either directly, by implication, by omission or addition.
- 3.3 In quoting from medical literature, or from the communications of clinical investigators, special care should be taken to ensure that the meaning of the original, taken as a whole, is not distorted.
- 3.4 Disparaging references to other products or manufacturers should be avoided.
- 3.5 Particular care should be taken that essential information on any pharmaceutical products' safety, contra-indications, side effects or toxic hazards is properly communicated to the Thai healthcare professionals and regulatory authorities.
- 3.6 In all printed promotional materials, the following list of information should be printed:
 - The name (s) of the active ingredient (s) using either International Non-proprietary Names (INN) or the approved generic name of the drug;
 - The brand name;
 - Content of active ingredient (s) per dosage form or regimen;
 - Name of other ingredients known to cause problems;
 - Approved therapeutic uses;
 - Dosage form or regimen;
 - Side effects and serious adverse drug reactions;
 - Precautions, contra-indications and warnings;
 - Serious interactions;
 - Name and address of manufacturer or distributor;
 - Reference to scientific literature as appropriate;
 - Approval number, granted by Thai FDA for approved contents of the promotional material, shall be printed on all promotional materials. Such promotional material shall only be used during the validity period of the approval.

- 3.7 When certified package inserts are required by the Thai FDA to be printed and provided in the Thai and English languages, the information imparted in both languages should be the same unless the text is changed by the FDA.
- 3.8 Any and all information required by the Thai FDA to be printed on the carton or label should be clearly legible.
- 3.9 In addition to the recommendations in the Codes, special rules apply to “reminder advertisement”. A reminder advertisement is an advertisement which presents only the trade name, the INN (International Non-proprietary Name) a reference to the indication or the therapeutic class, the sentence “Further information available on request”, the company logo and local address.
- 3.10 Company should have an established procedure for reporting Adverse Drug Reactions and product recall. All company representatives and other appropriate staff should be made fully aware of the company’s internal policies and procedures.
- 3.11 Company will assume responsibility, under the Code, for collecting breaches of the Code resulting from misconduct or misrepresentation of facts by any representative.
- 3.12 Oral presentation, including written, or by printing material should be current, accurate, balanced and appropriate. No promotion with indication which does not exist in certified package insert.

4.) Promotional Material

- 4.1 Promotional material includes any formats whether printed, electronic materials, audiovisuals, digital media and etc.
- 4.2 Promotional material must conform to the legal requirements set out in the Drug Act of 1967, 1979 and 1987 be approved by the FDA before publication and use during the approved period only.
- 4.3 It shall conform, both in text and illustration, to standards of good taste and shall recognize the professional standing of the healthcare profession recipients.
- 4.4 It shall not imitate the devices, copy slogans or general layout adopted by any other company, in a way that is likely to mislead or confuse.
- 4.5 Any change of clinical significance relating to product safety, should be incorporated into the product information, from the date of notification about the change and it should be indicated in all presentations of the product.
- 4.6 The requirements for the promotional material also apply to the advertisement in all printing journal.

5.) Interactions with Healthcare Professionals

5.1 Exhibitions

Exhibition is important for the dissemination of knowledge and experience to the healthcare professionals. The prime objective in organizing such displays should be the enhancement of medical knowledge. Where hospitality is associated with symposia and congresses, it should always be secondary to main purpose of the meeting.

- Exhibition must be directed only to healthcare professionals.
- Exhibition must include the name of the sponsoring company in a prominent position.
- Exhibitors must comply with all requirements of the sponsoring organization when setting up and conducting an exhibition.
- Product information for all products being promoted must be available at the exhibition stand.
- Raffles and/or games of chance are not to be held during the exhibitions.
- Company must not offer financial incentives to healthcare professionals to visit exhibition stand. Such incentives would include cash payment, cheque vouchers, and/or donations to charities or societies.
- Competitions that are hold as part of the exhibition must be on medical or scientific knowledge or enhancing medical or scientific knowledge. The prize should be directly relevant to the practice of medicine or pharmacy and may have a value of not over 500 Baht. Entry into a competition must not be dependent upon prescribing or recommending a product and no such condition shall be made or implied.

- During the exhibition, company shall not serve or make available alcoholic drinks in the display areas.
- Any activities during the exhibition shall not disturb (e.g. in the form of light, noise, or smell, etc.) other booths and conference participants.

5.2 Sponsorship to Scientific Meeting

Scientific and Educational Objectives

- The purpose and focus of all symposia, congresses and other promotional, scientific or professional meeting for healthcare professionals organized or sponsored by company should be to provide scientific or educational information and/or inform healthcare professionals about products.
- Any support to individual healthcare professionals to participate should comply with Code of Conduct, law and regulation, including hospital regulation, whichever is stricter.
- Sponsor can be made directly to the institution (not individuals) upon the institution's request to support activities for the healthcare professionals as long as it can be demonstrated that there is a link to scientific education, patient's benefit or charitable contribution that would benefit the improvement of healthcare services.
- When deciding whether to support an event organized by third party's meeting such as health organization or medical society as well as support of a healthcare professional to such events, criteria to be considered are, as follows:

A. Scientific Program

- The scientific program covers the whole duration of the event with content generally filling the business hours each day.
- The program content is scientifically grounded and adapted to the targeted audience.

B. Entertainment, leisure activities, meals

- Any entertainment (such as sightseeing tours or leisure activities) must not be organized in connection with the event either before, during or after or there is unreasonable or frequent traveling for meals during the event.
- Meals must not be arranged in tourist or heritage/cultural attractions.
- Meals as mentioned on the program must not appear to be excessive.
- The company providing sponsorship must ensure that entertainment and hospitality added for their sponsored doctors must be in accordance with the writing and spirit of the code.
- Accompanying Persons are required to pay the full reasonable costs which are not subsidized or facilitated in any way by the sponsoring company.
- Healthcare professionals are expected to participate in the meeting rather than encouraged to join any program with the accompanying persons.

5.3 Events Involving Travel

- Company must not organize an event for healthcare professionals that take place outside the country unless it is appropriate and justified to do so from the logistical or security point of view.
- Company may sponsor an event for healthcare professionals that take place outside the country if it is justified as regional or international scientific congress and symposium that derives participants from many countries.
- Travel for all sponsorship of attendee should be by economy class.
- Group transportation to and from the meeting venue for healthcare professionals is allowed. However, individual transport should be avoided.

5.4 Appropriate Venue

- All events must be held in an appropriate venue that is conducive to the scientific or educational objectives and the purpose of the meeting. Company must avoid using renowned or extravagant venues.
- Company must ensure that location selection should be based on participant travel convenience (easy to access), security, cost and capable of withstanding public scrutiny, and that the content of the meeting, not the site selection, attracts the audience.
- The geographical location is in or near a city or town which is a recognized scientific or business center and is easily accessible for the intended audience.

- The location and venue should not be the main attraction of the event or be perceived as such.
- The time of the event should not coincide with local or internationally recognized sporting or cultural events taking place in the same location, at the same time and preferably not just before or just after the meeting.
- The location is appropriate in respect to the geographical scope of the event.
- The venue is conducive to the scientific and educational purpose of the meeting.
- The venue has the necessary business and technical facilities to accommodate the meeting and its participants.
- The meeting facilities should only be accessible to intended audience and minimize travel for the majority of audience.
- The venue must not be renowned for its entertainment, sports, leisure or vacation facilities.
- The venue provides safe & secure accommodation when considering the chosen location.

5.5 Limits

- Sponsorship to healthcare professionals shall limit to the payment of legitimate travel, registration fees, meals, and accommodation only during the period and location of the sponsored event.
- It is clear that attendees are not being encouraged to arrive unnecessarily earlier before the meeting starts or unnecessarily stay longer after the meeting ends. If the official scientific session ends during the time that the attendees can travel back to their residence within the same day, last night accommodation is not allowed. However, on the exceptional basis under specific circumstances, the last night accommodation may be given if warranted by logistical considerations (e.g. flight schedule or late night travelling).
- Company shall handle arrangement of the meeting registration, accommodation reservation and other logistics on behalf of the sponsored attendees. Reimbursement of expenses against official receipt is possible. No cash advance to healthcare professionals is allowed.
- No payments are made to compensate healthcare professionals for time spent in attending the event.
- Any sponsorship provided to individual healthcare professionals must not be conditional upon an obligation to prescribe, recommend, purchase, supply, administer or promote any pharmaceutical product.

Refreshments and/or meals incidental to the main purpose of the event can only be provided:

- Exclusively to participants of the event and
- If they are moderate and reasonable but must not exceed 2,500 Baht (excluding VAT and service charges) per person per meal for local standard. When the event is taken place outside country, company shall comply with standard defined by host country. If host country does not define maximum value, company shall consider reasonable amount according to local standard.

5.6 Entertainment

- No entertainment or other leisure or social activities should be provided or paid for by the company.

5.7 Accompanying Person

- Invitations to attend medical and scientific meetings must only be given to healthcare professionals. Company should neither facilitate nor pay any costs associated with individuals accompanying invited healthcare professionals.

5.8 Fees for Services

Healthcare professionals may be engaged as consultants and advisors for service such as speaking at and/or chairing meetings and events, involving in medical/scientific studies, clinical trials or training services, participating in advisory board meeting, and participating in market research involving in remuneration. The arrangements which cover these genuine consultancies or other services must, to the extent relevant to the particular arrangement, fulfill all the following criteria:

- A written contract or agreement must be agreed in advance of the commencement of the services which specifies the nature of services to be provided and the basis for payment of those services.
- A legitimate need for the services must be clearly identified and documented in advance.

- The criteria for selecting consultants must be directly related to the identified need and the consultants must have the expertise necessary to provide the service.
- The number of consultants retained must not be greater than the number reasonably necessary to achieve the identified need.
- The hiring of the consultants to provide the relevant service must not be an inducement to prescribe, recommend, purchase, supply, and/or administer any medicine.
- The compensation for the services must be reasonable and reflect the fair market value of the services provided.

6.) Customary Gifts

Customary gifts can be presented to healthcare professionals as according to good tradition or local cultural event including floral wreaths to show respect and condolences for the loss of the healthcare professionals' immediate family members. The company is not allowed to pay cash or gold or a monetary gift (such as gift check). Customary gifts to healthcare professionals or medical institutes in this event must not be "frequently" and the value must not exceed 3,000 Baht at each time.

7.) Promotional Aids

- A promotional aid (giveaway) is a non-monetary item given for a promotional purpose. Promotional aids must be related to the work of the healthcare profession recipient and should be of minimal value and quantity.
- All promotional aids which serve as brand name reminders shall include the brand name of the product and/or the logo and/or the company name. They are not to contain any promotional claims including promotional tag lines and/or statement.
- Value of the promotional aid should be less than or equal to 500 Baht and comply with Thai FDA regulations.
- Medical utilities may include poster of vaccination used in diagnostic room or medical textbook since both items associated with patient's benefit, according to laws and regulations, company can present medical utilities if the value is not exceed 3,000 Baht.
- The medical utility does not offset routine business practices and is beneficial to enhancing the provision of medical services and patient care.

8.) Samples

Samples of products may only be supplied to the healthcare professionals authorized to prescribe that product or medical institution through their system of sample receiving.

- The size and quantity of the sample supplied should be appropriate.
- Samples can be used for familiarization with presentation and appearance of a product or to enhancing clinical experience.
- Samples should not be given with an intention to induce drug prescription or for personal benefit.
- Product samples must not be made available for collection from unattended stand, nor be supplied to unauthorized or non-qualified persons.
- All samples delivered by the sole distributors or company representatives should be securely packed and must be signed for by the receiver when received.
- This section does not refer to commercial product that is given to institution for product listing.

9.) Support for Continuing Medical Education

Continuing medical education (CME) helps ensure that healthcare professionals obtain the latest and most accurate information and insights on therapeutic areas and related interventions that are critical to the improvement of patient care and overall enhancement of the healthcare system. The primary purpose of an educational meeting must be the enhancement of medical knowledge and therefore financial support from companies is appropriate. When companies provide content to CME activities

and programs, such material must be fair, balanced and objective, and designed to allow the expression of diverse theories and recognized opinions. Content must consist of medical, scientific or other information that can contribute to enhancing patient care. Company support shall present to hospital administrative committee or department.

10.) Clinical Research and Transparency

10.1 Transparency

Companies are committed to the transparency of clinical trials which they sponsor. It is recognized that there are important public health benefits associated with making clinical trial information more publicly available to healthcare practitioners, patients, and others. Such disclosure, however, must maintain protections for individual privacy, intellectual property and contract rights, as well as conform to legislation and current national practices in patent law.

Companies disclose clinical trial information as set out in the Joint Position on the Disclosure of Clinical Trial Information via Clinical Trial Registries and Databases (2009, with minor revision as of October 30, 2017) and the Joint Position on the Publication of Clinical Trial Results in the Scientific Literature (2010, with minor revisions as of October 30, 2017) issued by the IFPMA, the European Federation of Pharmaceutical Industries : Code of Practice (EFPIA), the Japanese Pharmaceutical Manufacturers Association (JPMA) and the Pharmaceutical Research and Manufacturers of America (PhRMA).

10.2 Distinct from Promotion

All human subject research must have a legitimate scientific purpose. Human subject research, including clinical trials and observational studies, must not be disguised as promotion.

10.3 Post-marketing scientific studies, surveillance and dissemination of information

- 10.3.1 Post-marketing clinical trials for approved medicinal drugs are important to ensure their rational use.
- 10.3.2 Post-marketing scientific studies and surveillance should not be misused as a disguised form of promotion.
- 10.3.3 Substantiated information on serious hazards associated with medicinal drugs should be reported to the appropriate national health authority and healthcare professional concerned as a priority, and should urgently be disseminated internationally whenever possible.

11.) Market Research

The sole purpose of market research activities must be to collect data and not as a means to promote company's products to or reward healthcare professionals.

- 11.1 Methods used for market research must never be such as to bring discredit upon, or to reduce confidence in, the pharmaceutical industry. The following provisions apply whether the research is carried out directly by the company concerned or by organization acting on the company's behalf.
- 11.2 Market research must not in any circumstances be used as a disguised form of sales promotion and the research per se must not have a direct objective of influencing the opinions of the informant. The research design should be done in such a way that the data is unbiased and non-promotional.
- 11.3 The identity of an informant must be treated as being confidential, unless he/she has specifically agreed otherwise. Regardless of the existence of this agreement, it follows that the information provided (as distinct from the overall results of the research) must not be used as the basis upon which a subsequent approach is made to that informant for the purpose of sales promotion.
- 11.4 Precautions should be taken to ensure that informants do not suffer as the result of embarrassment following an interview, or from any subsequent communication concerning the research project.

12.) Interactions with Patient/Patient Organizations

12.1 Patient Organization

12.1.1 All interactions with patient organizations must be ethical. The independence of patient organizations must be respected.

12.1.2 Declaration of Involvement

When working with patient organizations, company must ensure that the involvement of the company and the nature of that involvement is clear from the outset. Company may not be the sole funder of the patient organization or any of its major programs.

12.1.3 Written Documentation

Company that provide financial support or in-kind contribution to patient organizations must have in place written documentation setting out the nature of support, including the purpose of any activity and its funding.

12.1.4 Events

Company may provide financial support for patient organization meetings provided that the primary purpose of the meeting is professional, educational, and scientific in nature, or otherwise supports the mission of the patient organization. When company hold meetings for patient organizations, company must ensure that the venue and location is appropriate and conducive to informational communication. In addition, any meals or refreshments provided by company must be modest as judged by local standards.

12.2 Patient Education

It is acknowledged that members of the public should have access to information on medical conditions and the treatments which may be prescribed by their doctors. The purpose of such information should be educational and should encourage patients to seek further information or explanation from the appropriate healthcare professional. In addition, the following criteria should be satisfied:

12.2.1 The educational material must be current, accurate and balanced.

12.2.2 The educational material should not focus on a particular product, unless the material is intended to be given to the patient by a healthcare professional after the decision to prescribe that product has been made.

12.2.3 Educational material may include descriptions of the therapeutic category, medical condition and a discussion of the relevant clinical parameters in general.

12.2.4 The educational material should include the advice "Please consult your physician" and the contact address and telephone number of the supplier of the material.

12.2.5 The educational material must include a statement directing the patient to seek further information about the condition or treatment from his/her doctor. Such statements must never be designed or made for purpose of encouraging members of the public to ask their doctor to prescribe a product.

12.2.6 The tone of the message must not be presented in a way which unnecessarily causes alarm or misunderstanding in the community.

12.2.7 On all occasions the information, whether written or communicated by other means, must be presented in a balanced way to avoid the risk of raising unfounded hopes of a particular product.

12.3 Patient Aids

Patient aids which are solely intended to provide information for the patient once a decision to prescribe that product has been made, may be product specific, provided that the items are primarily for educational purposes and do not have independent value. The content of such material must be designed to assist with patient compliance by providing information which clarifies method of administration, precautions, and special instructions and like information. It must not make comparisons or include promotional claims. Informational and educational items provided to healthcare professionals for patient use can include the company name, but must not be product branded, unless the product's name is essential for the correct use of the item by the patient.

12.4 Patient Support Programs

The programs should not have any intention to offset routine business practices and to be beneficial to enhancing the provision of medical service and patient care. Companies should ensure compliance with the following requirements when they have to involve in any patient support program (PSP):

- Any payment for the work undertaken by a healthcare professional in such programs is commensurate with the work undertaken;
- No incentives, other than material that will enhance positive health outcomes and compliance, are provided to patients to become involved in these programs;
- The program complies with applicable laws;
- All information provided to patients must comply with Sections 12.2 and 12.3 of this Code;
- The data collected from these programs will not be used for any purpose other than to increase positive health outcomes and never for promotional activities; and
- The duration of these programs is appropriate to the disease state treated by the product involved.

13.) Promotion to non-Healthcare Professionals (or Public)

Prescription products must not be promoted to the public unless such activities are permitted by law. Any information provided must be accurate, balanced, factual and not misleading or raising false hopes related to the product. Where the company need to interact with the public, in responding inquiries, create disease awareness, provide educational message, such activities should adhere to the highest standards of accuracy and support the role of healthcare professionals.

13.1 General Inquiries

Request from individual members of the public for information or advice on the company product, diagnosis of disease, choice of therapy or personal medical matters should be refused and the inquirer must be directed to consult their doctors.

13.2 Media Release

- 13.2.1 A prescription product related media release issued by company is not allowed by the Thai FDA; however, it is acceptable to respond to media inquiries. The information provided must be current, accurate and balanced. Information about the medicine must not encourage members of the public to ask their medical profession to prescribe a particular pharmaceutical product.
- 13.2.2 Company may supply information about a product to the lay press only where this is in the public interest or where the objective is to communicate scientific or technical achievement. Such information should be presented in a balanced way to avoid the risk of raising unfounded hopes.
- 13.2.3 Product information should be released for lay publication only after the medical profession has been properly notified and following approval from the FDA if this is required by the current Drugs Act.
- 13.2.4 Advertising of self-medication products to the public is excluded from the scope of the Code. However, should medicines regarded as 'pharmaceutical products' in most countries, be designated Non-Dangerous in Thailand, it is suggested that any lay promotional material should comply with the guidelines established for "pharmaceutical products".
- 13.2.5 Intentional dissemination of information or hidden advertisement of dangerous medicines through radio disk jockey or television moderator is forbidden.

13.3 General Media Articles (Advertorial Articles)

General media articles concerning specific prescription products must not be initiated by company. However, information on medical conditions is allowed. Company should not attempt to encourage the publication of general media articles or content with the aim of promoting its products, but may offer to provide educational material or review copy to ensure accuracy.

13.4 Direct mailing of product promotional materials from company to non- healthcare professionals is prohibited.

13.5 Discredit to, and Reduction of, Confidence in, the Industry

Activities with, or materials provided to members of the public must never be such as to bring discredit upon, or reduce confidence in the pharmaceutical industry. Such activities would be seen as a severe breach of the Code of Conduct.

14.) Company Procedures and Responsibilities

14.1 Procedures

- Company is responsible for internal procedure to implement Code of Conduct completely with good intention, those procedure should be documented and distributed to all employees or download in company website.
- Company must strictly comply with fundamental law of National Anti-Corruption Commission section 176 such as prohibition payment to welfare fund of government hospitals or any donation associated to purchase of those hospitals/institutes.

14.2 Training

- Companies should ensure that relevant employees receive regular training appropriate to their roles.

15.) Company Representatives

- 15.1 Company representatives must be adequately trained and should possess sufficient medical and technical knowledge to present information on the company's products in an accurate, current and balanced manner and cognizant of all provisions of this Code.
- 15.2 Company representatives should at all times maintain a high standard of ethical conduct in the discharge of their duties.
- 15.3 Oral presentations as well as written or printed material must aim at accuracy, fairness, balanced and good taste. No promotion should be used for off-label product claims.
- 15.4 Unfair or misleading comparisons, or comparisons implying a therapeutic advantage which is not in fact justified, must be avoided.
- 15.5 Company representatives must not employ any inducement or subterfuge to gain a call; neither should any fee be paid for that purpose.
- 15.6 Company representatives must take adequate precautions to ensure that medical product in their possession are secure and stored in accordance with the recommended storage conditions.
- 15.7 Company must prepare and provide to company representatives, detailed briefing material on the technical aspects of any product which is to be promoted.
- 15.8 Company representatives should dress professionally in business attire or uniform while performing their duties.
- 15.9 Company representatives should ensure that the frequency, timing and duration of appointment, together with the manner in which they are made, are such as not to cause inconvenience to the doctors, pharmacists or nurses. In addition, company representatives should meet healthcare professionals in place as specified by the hospitals and, if possible, refrain from meeting healthcare professionals in OPD during their operation hours and while healthcare professionals are meeting with or examining patients.

16.) Code of Conduct Committee

Code of Conduct Committee consist of similar structure like ISO 37001 (Anti-bribery management systems) committee. The role of Code of Conduct Committee will be to judge complaints regarding breaches of BVL Code of Conduct.

17.) Complaint Procedure

- 17.1 Formal Complaints - The real name, email address and telephone number must be provided with evidence for reference.
- 17.2 Anonymous Complaints - Anonymous complaints can be submitted either in writing or via telephone call to the Code of Conduct Committee. Complainant may request for being anonymous informant.
- 17.3 The names of the complainant will remain confidential throughout the process.
- 17.4 When the Code of Conduct Committee receives complaints, the complaints will be checked whether breaches of the codes have occurred or not. The complaint processing will be finished within 3 months.
- 17.5 Complaint Disposal - The decision of the code of conduct committee is final and will inform company representative who breach the codes.

18.) Sanction

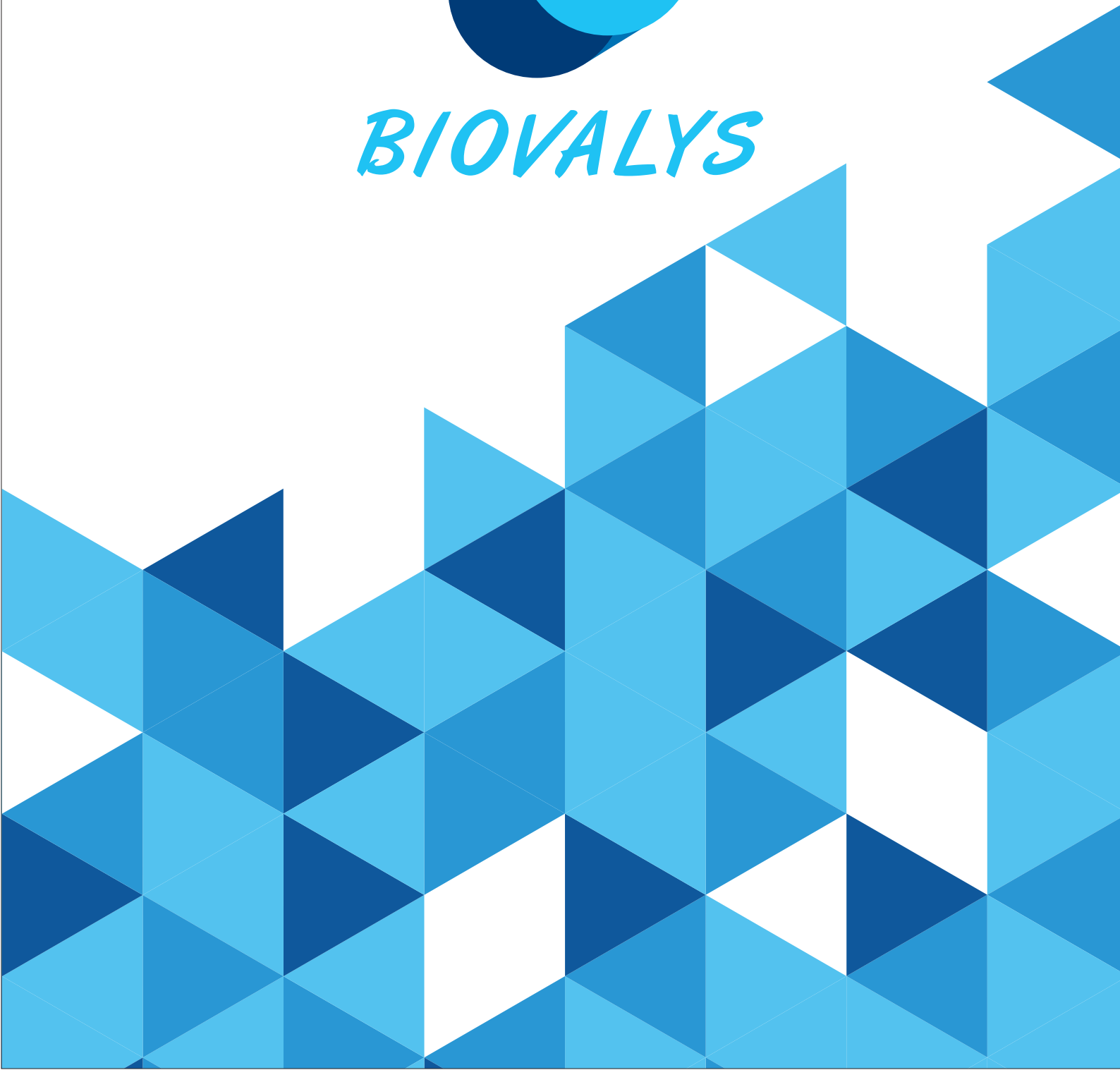
Company shall apply the following sanctions to the company Representatives found in breach of the Code

- 16.1 Verbal Warning.
- 16.2 Warning Letter.
- 16.3 Refrain from working in responsible area
- 16.4 Termination of employee without paying compensation

The decision of the code of conduct committee is final. The Code of Conduct Committee will adjudicate based on the codes and the compiled evidence in that time



BIOVALYS



แบบฟอร์มการขอเผยแพร่ข้อมูลผ่านเว็บไซต์ของหน่วยงานในราชการบริหารส่วนกลาง
สำนักงานปลัดกระทรวงสาธารณสุข

ตามประกาศสำนักงานปลัดกระทรวงสาธารณสุข

เรื่อง แนวทางการเผยแพร่ข้อมูลต่อสาธารณะผ่านเว็บไซต์ของหน่วยงาน พ.ศ. ๒๕๖๑
สำหรับหน่วยงานในราชการบริหารส่วนกลางสำนักงานปลัดกระทรวงสาธารณสุข

แบบฟอร์มการขอเผยแพร่ข้อมูลผ่านเว็บไซต์ของหน่วยงานในสังกัดสำนักงานปลัดกระทรวงสาธารณสุข

ชื่อหน่วยงาน : ศูนย์ปฏิบัติการต่อต้านการทุจริต กระทรวงสาธารณสุข

วัน/เดือน/ปี : ๓๑ มีนาคม ๒๕๖๕

หัวข้อ: เกณฑ์จริยธรรม บริษัท ไปโอวาสิส จำกัด

รายละเอียดข้อมูล (โดยสรุปหรือเอกสารแนบ)

เกณฑ์จริยธรรม บริษัท ไปโอวาสิส จำกัด

Link ภายนอก: ไม่มี

หมายเหตุ:

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.....

ผู้รับผิดชอบการให้ข้อมูล

สุชาภา วรินทร์เวช

(นางสาวสุชาภา วรินทร์เวช)

ตำแหน่ง นักวิเคราะห์นโยบายและแผนชำนาญการพิเศษ

วันที่ ๓๑ เดือน มีนาคม พ.ศ. ๒๕๖๕

ผู้อนุมัติรับรอง

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วันที่ ๓๑ เดือน มีนาคม พ.ศ. ๒๕๖๕

ผู้รับผิดชอบการนำข้อมูลขึ้นเผยแพร่

พศวีร์ วัชรบุตร

(นายพศวีร์ วัชรบุตร)

นักทรัพยากรบุคคลปฏิบัติการ

วันที่ ๓๑ เดือน มีนาคม พ.ศ. ๒๕๖๕