



SPECIAL PANEL DECISIONS DISCLOSURE OF VIOLATIONS

Procedure for Review of Complaints and Disputes
Regarding Violations of the AIPM Code of Practice

2021

ASSOCIATION OF INTERNATIONAL
PHARMACEUTICAL MANUFACTURERS

АССОЦИАЦИЯ МЕЖДУНАРОДНЫХ
ФАРМАЦЕВТИЧЕСКИХ ПРОИЗВОДИТЕЛЕЙ

Case summary

- Pushkarskaya Sloboda 4-star Hotel Complex located at 45 Lenina St., Suzdal, Vladimir Region, Russia (<https://www.pushkarka.ru/>) was chosen to be the venue for the two-days scientific event organized by a pharmaceutical company in April 2021 for HCPs from cities and towns outside Vladimir Region.
- The Special Panel places emphasis on the following facts:
 - The town of Suzdal is not the appropriate location for the event, as it is not easily accessible for the intended audience from other cities and towns to travel to it;
 - Suzdal is not generally recognized as a scientific, business, nor regional center;
 - The public considers Pushkarskaya Sloboda Hotel Complex primarily to be a facility for recreation and tourism.
- Pushkarskaya Sloboda Hotel Complex grants guests access to its spa center. Hence, the HCPs invited to the two-day event could use the spa center's services, which cannot be considered a factor contributing to the achievement of the scientific and educational goals of the event.

Decision of the Special Panel

The Special Panel acknowledged the violation by the Company of cl. 3.3.4 of the AIPM Code and cl. 13 of Annex 3 of the Code.

Recommendations & Sanctions of the Special Panel

- ☑ In the future, to avoid organizing and/or supporting events at Pushkarskaya Sloboda Hotel Complex or similar venues;
- ☑ Oblige the Company's employees responsible for organizing and/or supporting scientific events for the HCPs to complete online training on the AIPM Code.

Case summary

- Two-days scientific event for healthcare professionals was organized by a pharmaceutical company in June 2021 at Radisson Rosa Khutor 5*, located at the Rosa Khutor resort, which cannot be considered a circumstance that facilitates the scientific and educational goals of the event.
- The Special Panel takes note that, according to the examined information:
 - 1) Radisson Rosa Khutor 5* is rated 5*;
 - 2) The event was attended by delegates from various regions of the Russian Federation;
 - 3) Rosa Khutor has the status of a resort and is not a generally recognized scientific, business or regional center. In addition, the event was held during one of the most popular seasons for the region, when healthcare professionals had access to entertainment facilities both directly in Rosa Khutor and in the surrounding areas. The Special Panel particularly noted that Rosa Khutor cannot be considered exclusively a winter resort;
 - 4) The fact that the participants of the event stay at a 4-star hotel while the event is organized and/or supported at a 5-star hotel cannot justify non-compliance with the requirements of the AIPM Code.

Decision of the Special Panel

The Special Panel acknowledged the violation by the Company of cl. 3.3.4 of the AIPM Code and cl. 13 of Annex 3 of the Code.

Recommendations & Sanctions of the Special Panel

- ☑ In the future, to avoid organizing and/or supporting events at Radisson Rosa Khutor 5*, located at the Rosa Khutor resort, or similar venues;
- ☑ Inform the Company headquarters about the violation;
- ☑ Oblige the Company's employees responsible for organizing and/or supporting scientific events for the HCPs to complete online training on the AIPM Code.

Case summary

In the frame of the ethical dispute, the letter and its content that the company submitted to the regional ministry of health were considered.

The Special Panel notes that based on the clause 1.3. of the Code the AIPM Code of Practice is not applicable to pharmaceutical companies' relations with state and municipal bodies, state, and municipal servants.

Decision of the Special Panel

AIPM Special Panel decides that the activities of the company, which are the subject of the dispute, do not fall under the regulation of the AIPM Code of Practice and, accordingly, cannot be reviewed by the AIPM Special Panel for the presence or absence of violations of the Code.