

CODE OF PRACTICE

Preamble

- i. The ethical dealing with national authorities such as drug therapeutic committees responsible for selecting priority medical products (referred to hereunder as « Products ») is an essential component to MFA's mission to improve the availability of quality affordable Products.
- ii. This Code of Practice outlines standards for the ethical dealing with Products that helps ensure that MFA's interactions with national authorities and other stakeholders, such as health professionals and patient organizations, are appropriate and perceived as such.
- iii. It is accepted that where there is an established framework of stringent regulatory and/or legal controls which are effectively as comprehensive in their provisions and application as this Code, MFA will comply with such frameworks and procedures.
- iv. MFA acknowledges the role of relevant codes of Practice developed by respected standard setting national and international bodies such as the World Health Organization.

MFA Code of Practice

1. Scope

The MFA Code of Practice covers interactions between MFA representatives and national authorities, healthcare professionals, medical institutions, patient organizations and suppliers of healthcare products.

2. Definitions

For the purposes of the MFA Code of Practice:

“healthcare product” (Product) means all pharmaceutical or biological products as well as all diagnostics, medical devices and equipment (irrespective of patent status and/or whether they are branded or not) which are intended to be used in the diagnosis, treatment or prevention of disease in humans, or to affect the structure or any function of the human body including under the prescription of, or under the supervision of, a healthcare professional.

“national authority” means any government agency such as the Ministry of Health or any other person empowered to make decisions on health matters on behalf of the country.

“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 select, prescribe, recommend, purchase, supply, or administer a Product.

“medical institution” means typically an organization that is comprised of healthcare professionals and/or that provides healthcare, makes healthcare policy or conducts healthcare research.

3. Events

3.1 Events Involving Foreign Travel

MFA may not organize or sponsor an Event for healthcare professionals (including sponsoring individuals to attend such an Event) that takes place outside of their home country unless it is appropriate and justified to do so from the logistical or security point of view.

3.2 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 Event or meeting. MFA must avoid using renowned or extravagant venues.

Whilst the concepts « renowned » and « extravagant » are difficult to define, MFA considers that, as a general rule, the hospitality provided must not exceed what participants would normally be prepared to pay for themselves.

3.3 Limits

Refreshments and/or meals incidental to the main purpose of the Event can only be provided: to participants in the Event; and if they are moderate and reasonable as judged by local standards.

3.4 Entertainment

No entertainment or other leisure or social activities should be provided or paid for by MFA.

3.5 Sponsorships

MFA may sponsor healthcare professionals to attend Events provided such sponsorship is in accordance with the following requirements:

- (i) the Event complies with the requirements in this Code of Practice as described in 3
- (ii) Sponsorship to healthcare professionals is limited to the payment of travel, meals, accommodation and registration fees;
- (iii) no payments are made to compensate healthcare professionals for time spent in attending the Event; and
- (iv) any sponsorship provided to individual healthcare professionals must not be conditional upon an obligation to select, prescribe, recommend, purchase, supply, administer or promote any healthcare product.

3.6 Guests

MFA will not pay any costs associated with individuals accompanying invited national authorities or healthcare professionals.

4. Gifts and other Items

Payments in cash or cash equivalents (such as gift certificates) must not be provided or offered to national authorities, healthcare professionals or to actors –be they members of the MFA organization or not- involved in the procurement process. Gifts (such as sporting or entertainment tickets, electronics items, etc.) for the personal benefit of national

authorities, healthcare professionals or of actors in the procurement process must not be provided or offered.

5. Miscellaneous

5.1 MFA will take all necessary steps to instruct its employees, directors, advisors, consultants and partners on the provisions hereof. The Board will issue on a yearly basis a report on the compliance of MFA with this Code of Practice as well as on any necessary corrective measures.

5.2 For any issue not dealt with in this Code, MFA refers to the established framework of stringent regulatory requirements and/or legal controls which are effectively as comprehensive in their provisions and application as this Code of Practice.

6. Entry into force

This Code entered into force on 15 February 2015. It can be modified as required by the Board of Directors.

Signature and date



23 April 2017

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Founder and CEO