

## **PhRMA Code on Interactions with Healthcare Professionals – External Verifications**

The PhRMA Code on Interactions with Healthcare Professionals states that companies are encouraged to seek external verification periodically (ideally, at least once every three years) that company has policies and procedures in place to foster compliance with the Code.

External verifications of compliance evaluate whether the company has policies, procedures or guidelines in place to foster compliance with the PhRMA Code in effect as of January 1, 2009. Specifically, the external verification should be performed by an entity with sufficient expertise, objectivity and independence from the company, and that entity should confirm that:

1. the company has policies, procedures, or guidelines in place that address the topics covered in the 15 sections of the PhRMA Code where applicable;
2. the company has made any necessary revisions to relevant policies, procedures or guidelines to reflect requirements of the PhRMA Code and periodically evaluates the need for additional updates or revisions;
3. relevant company employees have received information/training on the requirements of the PhRMA Code and the company periodically evaluates and addresses the need to provided additional training;
4. the company has considered, planned and implemented the steps it will take to monitor compliance with the requirements of the PhRMA Code on an ongoing basis; and
5. the company has considered, planned and implemented the steps it will take to address reported incidents of non-compliance with the requirements of the PhRMA Code.

As of December 29, 2011, the following companies have submitted external verifications:

**AstraZeneca LP**

**Bayer HealthCare Pharmaceuticals**

**Eli Lilly and Company**

**Merck & Co., Inc.**

**Millennium Pharmaceuticals, Inc.**

**Pfizer Inc**

**sanofi-aventis U.S.**

**Talecris Biotherapeutics**