

POLICY ON WORKING WITH THE PHARMACEUTICAL AND MEDICALLY-RELATED PRODUCTS INDUSTRY

1. Background

Cystic Fibrosis Canada has nurtured a mutually beneficial relationship with the corporate sector for many years, including receiving support from a number of pharmaceutical companies, medical device manufacturers and companies that produce medically-related products.

For the purposes of this policy, CF Canada considers a pharmaceutical company to include manufacturers and/or distributors and/or suppliers of pharmaceutical and medically-related products, of therapeutic devices and of non-prescription health care products such as vitamins, enzymes and dietary supplements.

To minimize the potential for conflict of interest between CF Canada and the pharmaceutical and medically related products industries, and to minimize any perception of conflict of interest, and to guide the relationship of CF Canada, its associations and chapters with representatives of the pharmaceutical and medically-related products industry, the CF Canada Board of Directors has adopted this policy (referred to as the Pharmaceutical Policy) and Guidelines.

In addition, this policy takes into consideration the ethical principles and practices of the pharmaceutical industry, including Innovative Medicines Canada (IMC)'s Code of Ethical Practices¹, regardless of whether the industry representative is a member of IMC or not. Innovative Medicines Canada (IMC)'s Code of Ethical Practices is used as a guideline, and stipulates that "the industry is committed to engaging in relationships that are transparent, trustworthy and credible" and "members should maintain transparent funding relationships with all stakeholder partners and require their stakeholder partners to do likewise."

Cystic Fibrosis Canada wishes to uphold its integrity as a registered health charity and maintain independence and transparency in working with industry partners. Pharmaceutical companies offer health charities support for several reasons: to enhance patient and professional education programs and research under the auspices of an organization that serves the needs of individuals concerned with given diseases; and to provide a means of increasing corporate visibility outside of the normal marketing or advertising channels. In most cases, companies will support a health charity's programs if their own research and development strategy is focused on the development of agents for treating the disease(s) that are of concern to the charity. In other cases, support is provided simply in the spirit of good corporate citizenship. Support may be in the form of direct donations and/or information about a company's product and/or monetary support for educational programs, conferences, programs, fundraising events and research or clinical programs.

2. Benefits to CF Canada

Support from the pharmaceutical industry can aid in fulfilling the mission of CF Canada. CF Canada will accept funds that support the mission and values of the organization, in accordance with the CF Canada Gift Acceptance Policy and its appendices, and:

- (a) Only if support is provided without restrictions, control over programs and research content and/or development being maintained as the responsibility of CF Canada; or

¹ See <http://innovativemedicines.ca/ethics/code-of-ethics/>

- (b) If the funds are directed to a designated use which has received prior approval from the Chief Executive Officer (CEO) or Chief Development Officer (CDO) or designate, in accordance with the guidelines below.

3. Support from the pharmaceutical industry may be received by CF Canada in the form of:

- (a) Grants or donations;
- (b) Sponsorship (sponsorship benefits may only be provided under the corporate name of the company not a specific brand or product);

Furthermore, where possible, CF Canada will not limit support to a single company, to avoid any potential or perceived conflict of interest or accusation of undue influence on the policies or work of the organization.

4. Risks to CF Canada

The main risks to CF Canada of accepting support from the pharmaceutical and medically-related products industry is that CF Canada may be perceived as endorsing a company's product(s) and that the independence and impartiality of CF Canada as a health charity may be compromised by such relationships.

In order to minimize risk and safeguard independence, CF Canada will not accept support from companies for activities that are not part of the organization's strategy and mission.

5. Overall Guidelines

The following guidelines summarize how all representatives of CF Canada will act when seeking or receiving support from the pharmaceutical and medically related product industries. In addition to these guidelines, CF Canada works within the spirit of Innovative Medicines Canada (IMC)'s Code of Ethical Practices, regardless of whether the potential supporting company is a member of IMC or not.

- (a) CF Canada-initiated research or clinical programs, sponsored by pharmaceutical companies, will have the formal approval of the CF Canada Board of Directors, be ethically defensible, socially responsible and scientifically valid.
- (b) Acknowledgement of financial support will be made without references to specific products or brands, but rather only to the corporate name.
- (c) Any representative of CF Canada must follow the organization's internal prospect clearance process.
- (d) Any representative of CF Canada will not accept gifts and/or honoraria for personal use from the pharmaceutical industry.
- (e) In keeping with federal and provincial legislation, CF Canada is committed to protecting the privacy and confidentiality of people living with CF and their families and caregivers, and the Privacy Policy² of the organization will be adhered to. Specifically, CF Canada will not provide company representatives with the names of people living with CF or their caregivers.

² See <https://www.cysticfibrosis.ca/privacy-policy>

- (f) A written agreement between the supporting company and CF Canada will be developed recognizing the autonomy and independence of CF Canada and its activities. This written agreement will:
- i) Stipulate that the supported program serves a scientific or educational purpose and is not for the purpose of promoting any product;
 - ii) Include a statement that the funds are payable to CF Canada and that acceptance of funding is in no way considered an endorsement of any products manufactured or distributed by the supporting company.

6. **SUPPLEMENTARY GUIDELINES**

(a) Funding of scientific or educational programs

Financial support may be solicited or offered in support of CF Canada scientific or educational programs developed for the CF community, researchers, clinicians, caregivers and/or allied health professionals. Educational materials such as webinars, websites, newsletters, brochures, posters, videos, etc. may be written and produced with the assistance of an unrestricted educational grant.

When such support is received, the following will be adhered to:

- i) Any monetary support will be provided in the form of an unrestricted educational grant, i.e. the supporting company may make suggestions but cannot determine the content, budget, selection of speakers or support materials of said initiative.
- ii) It is acceptable to restrict donated funds to certain elements of a CF Canada program such as speaker costs, travel, refreshments or materials.
- iii) Company representatives will not present educational sessions related to pharmaceutical products, but may attend, have materials/booth on-site and be acknowledged at events.
- iv) Presenters will provide accurate and unbiased information.
- v) In any form of electronic material, the company's logo, name and/or acknowledgement of support may not link to the company site, and should not refer to any specific products.
- vi) CF Canada will consider requests from the pharmaceutical industry to provide submissions to Health Canada and other regulatory bodies subject to such requests meeting CF Canada's criteria and approval.

(b) Events

Pharmaceutical companies are permitted to sponsor CF Canada fundraising and general events. A formal sponsorship agreement with categories, corresponding dollar values and key benefits (such as recognition) will be developed for each sponsorship arrangement.

If a pharmaceutical company receives tickets as a benefit to their sponsorship, it is that company's responsibility to invite guests to use the tickets or join them at the event, not that of CF Canada. If the company "donates back" tickets, CF Canada will disclose the company's name to any guests invited to use those tickets.

