

# Haleon Code of Scientific Engagement

This Scientific Engagement (SE) Code describes interactions and the exchange of scientific information (non-promotional engagement) between Haleon and External Experts (EEs)<sup>1</sup> such as Healthcare Professionals (HCPs), Health Care Organisations (HCOs) and/or other Scientific Professionals to advance scientific and medical understanding.

This Code applies to everyone in Haleon, and any third parties contracted to work on our behalf to conduct the activities described in this code (The person contracting the 3<sup>rd</sup> party is accountable for ensuring this Code is complied with). It summarizes the principles and requirements for executing **non-promotional scientific engagement** activities. If the regulations in a country are more stringent than the Haleon Code, then the more stringent rules apply.

All Scientific Engagement activities must comply with Haleon’s Anti-bribery and Corruption Policy, and Code of Conduct.

## Principles:

The overarching principles for the SE Code, aligned to Haleon’s mission of “Deliver Better Everyday Health with Humanity”, are defined as:

- **Consumer Centricity** – putting the needs of our consumers & patients first.
- **Trusted Science** – enabling collaborations between Haleon and external experts to engage and discuss the science behind our products independent of promotional influence.
- **Transparency & Accountability** – ensuring Haleon clearly communicates the minimum standard for how it will engage with external experts and adheres to these commitments irrespective of country.

For any Haleon activity covered in this code the following TIPP guidance should be followed:

- **Timely:** There is a legitimate need for the activity at the time it occurs
- **Intention:** The intent is clear, transparent, and non-promotional
- **Proportionality:** The timing and scale are proportionate to the scientific need
- **Perception:** The activity is not promotional and would not be perceived as being promotional

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<sup>1</sup> In this document we will use External Expert (EE) to refer to HCP, OHS, Healthcare Organisations, Scientific Professionals

## Highlight of differences with the Haleon Code of Promotion

External Experts may be engaged by commercial staff for promotional purposes following the Haleon Code of Promotion, QD-STD-003377. The following key activities are considered non-promotional, and must be undertaken by R&D staff following this code:

### Key Activities

Seeking Advice from Healthcare Professionals.....	3
Communication of our Research at Scientific Congresses/Conferences.....	3
Workshop Discussions .....	4
Medical Education .....	4
Scientific interactions with payers, governments, and public health organizations.....	5
Supporting Advocacy Organizations .....	6

## Seeking Advice from Healthcare Professionals

R&D staff may seek advice, insights and information related to established or new disease areas, wellness, or self-care through:

- 1) Advisory boards and 1:1 type consultancy under contract.
- 2) Spontaneous and scheduled discussions with individuals or groups without a contract.

### Requirements:

- Ensure the completion of due diligence requirements specified in **Consumer Healthcare Procedure for Third Party Risk Management, QD-SOP-032091**.
- Ensure the Fair Market Value (FMV) payment is within the range specified in the local FMV tables found on the External Expert Resource Portals
- Ensure local Transfer of Value (TOV) is disclosed and travel restrictions are adhered to per country requirements.
- Ensure any Conflict of Interest is resolved prior to an engagement with an EE.
- For advisory board meetings ensure the appropriate balance of Haleon associates engaging with external experts and that all Haleon associates have a clearly defined role in the meeting (for on-line events observers are permitted but they must be identified as such and are not participants in the meeting. The appropriate balance will be at the discretion of the meeting Chair (who may seek advice from Legal & Compliance).

Record interactions in the appropriate system including the capture of any insights or information relevant to our science / products.

### References:

- Engaging with External Experts to Provide Services, QD-SOP-031145.
- Procedure for Managing Third Party Risk Management (TPRM), QD-SOP-032091.
- Engaging External Experts Resource Site

## Communication of our Research at Scientific Congresses/Conferences

R&D staff may disseminate and discuss our research results through events such as congresses (posters/presentations), scientific satellite symposia or scientific congress booths.

### Requirements:

- Scientific publications (posters/presentations) and discussions at congress are intended to increase external understanding of our research and support the appropriate use of our products. Any perception of promotion in connection with dissemination of scientific information must be avoided.
- Scientific and medical presentations and discussions must be factual, fair, balanced (i.e., we do not overstate efficacy, understate safety, or make unsubstantiated comparisons) and deliver the content in accordance with local laws, regulations, and applicable trade industry codes.

- The scientific communications should be transparent and relevant, any conflict of interest about Haleon’s specific involvement must be disclosed.
- The number of publications at congress (oral or poster presentations) must be driven by a legitimate medical/scientific need and not a desire to increase citations or publicity.
- There must be clear separation of scientific and promotional activities at medical/scientific congresses.
- If responding to a product off-label question, identify it as such. The scientific response is provided by R&D staff and should be evidence-based and non-promotional. The response must not **recommend the use of a product for any unapproved indication**. If a response is not available, the enquiry can be forwarded to the Global Medical Information function to respond.

**References:**

- Scientific Publication Process, QD-SOP-009205.
- Scientific Publications Resource Site

## Workshop Discussions

R&D Staff may use a Haleon workshop to discuss topics of relevance and importance to External Experts (EE). These are Haleon-led and may be conducted within or outside of a congress/scientific meeting.

**Requirements:**

- Ensure the topic for discussion is driven by EE needs/interests or from an internal review identifying information gaps seen from medical information data, market research, or EE interactions.
- Obtain endorsement of the scientific justification for the event by the functional lead (e.g., Business Unit/Category Medical Affairs Lead, Consumer Safety Lead, etc.) where the event is taking place.
- Inform the relevant Cross-BU / Category Medical Affairs Lead or Head of Clinical Development when starting to plan a Workshop.

**References:**

- Engaging with External Experts to Provide Services, QD-SOP-031145.

## Medical Education

Haleon may support Medical Education (ME) on scientific or clinical topics to External Experts where a need has been identified. Haleon-supported ME may or may not be accredited (for professional development learning credits), depending on local market regulations and industry standards.

**Requirements:**

- The Business Owner (BO) overseeing the Medical Education activity must ensure the program meets local accreditation standards, where applicable, if the program is providing Continuing

Education Credits to HCPs. In some countries the program must be 'Independent'\* from any company influence.

- Medical Affairs Lead signs off the on the vendor selection to conduct the program(s)
- The topic must be medical / dental / scientific in nature, relevant to the professional knowledge for awarding any continuing education credits to HCPs.
- Document learning objectives for participants.
- The educational programme should meet relevant local professional (e.g., Medical / Dental associations), legal and regulatory requirements.
- The funding provided by Haleon needs to be declared and the third-party Faculty (receiving the training) needs to disclose any conflict of interest.
- Ensure the third-party provider has the capability and credentials to plan and carry out a ME programme.
- Does not contain promotional content, for example, brand name.
- Does not advocate the use of our products without a balance of alternative treatments.
- Does not make product claims.

\* **Independent Medical Education (IME)**: Haleon provides only funding, not content or editorial control in response to a documented independent request for support.

#### References:

- Medical Education, QD-SOP-021097.

## Scientific interactions with payers, governments, and public health organizations

Haleon can provide non-promotional information to payers, governments, medical societies, and public health organisations to support disease or health related policies and guidelines, proactively or in response to a request.

#### Requirements:

- Follow any official government and/or regulatory authority procedures for industry submission of information packages to support the development of official recommendations. Haleon should not be directly involved in the development of official recommendations.
- Record interaction to ensure insights or information relevant to our science / products are captured.
- Ensure that Haleon does not provide funding for the activity.
- Ensure disclosure of any Haleon support.

#### References:

- Global Anti-Bribery and Corruption Policy, QD-POL-000314.
- Working with Public Policy Groups, QD-SOP-033208.

## Supporting Advocacy Organizations

Insights from patient, consumer or advocacy organizations can help guide the development of Haleon products. Haleon consumer/patient support is considered only when it brings scientific or medical value for the benefit of consumers/patients.

Haleon engages with advocacy organizations through mutual interests of improving access, standards of care and consumer/patient outcomes. Haleon support may include collaboration on disease awareness, prevention, well-being, self-care, and educational assistance to consumers/patients.

### Requirements:

- Ensure Haleon’s interaction with patient organizations is non-promotional and not intended to use the patient organization to endorse or distribute (e.g., sampling) Haleon products.
- Information provided by Haleon must be non-promotional, supporting the development of patient/consumer-centred treatment options/guidelines.
- Any Haleon support is clearly disclosed.
- A contract must be in place.

### References:

- Interacting with Patient Organisations, QD-POL-000306

<b>REVISION (Principal Changes from last revision)</b>	
<b>Type of Change:</b>	<input type="checkbox"/> New <input type="checkbox"/> Administrative changes; <input checked="" type="checkbox"/> Technical changes impacting: <input checked="" type="checkbox"/> Roles and responsibilities <input checked="" type="checkbox"/> Process or activities
<b>Reason for Change</b>	To align with roll-out of new <b>Medical Education SOP (QD-SOP-021097)</b> .
<b>Description of Change</b>	<ul style="list-style-type: none"><li>• Updated and simplified section “Highlight of differences with the Haleon Code of Promotion”.</li><li>• Updated section “Medical Education” based on Medical Education, QD-SOP-021097.</li><li>• Moved requirements for recording interactions from section “Principles” to “Requirements” section for relevant key activities.</li><li>• Updated section “Communication of our Research at Scientific Congresses/Conferences” to provide more clarity on responding to off-label enquiries.</li><li>• Updated Reference sections throughout for outdated hyperlinks and cross-references.</li><li>• Formatting.</li></ul>