

Sanofi Pasteur California Compliance Policy

GENERAL POLICY:

The attached Sanofi Pasteur California Compliance Policy is intended to:

- 1) Educate Sanofi Pasteur personnel on proper policy and procedure related to interactions with health care professionals and promotional activities.
- 2) Assist in compliance with California laws and regulations, company policies, industry standards and operating procedures.
- 3) Maintain consistency in the way Sanofi Pasteur conducts business in California.

Policy Requirements:

- All Sanofi Pasteur Associates in California are responsible for knowing and following the Sanofi Pasteur California Compliance Policy related to interactions with health care professionals and promotional activities, as well as the *Sales Conduct and Grant and Donations* Policies. Any questions about these or other policies should be directed to your immediate manager.
- Sanofi Pasteur will not tolerate any violation of its policies. Any representative who violates, supports others to violate; or becomes aware of and fails to report a violation will be subject to disciplinary action, consistent with Sanofi Pasteur's Discipline Policy.

I hereby acknowledge that I have read the attached Sanofi Pasteur California Compliance Policy, that I understand the Policy contained herein, and that I accept and agree to be bound by this Policy.

Date: _____

Signature: _____

Print Name: _____

Please date, sign, print your name and fax a copy to Marketing & Sales Administration at (570) 839-5402. Keep the attached pages for your reference.

Sanofi Pasteur

Sanofi Pasteur USA	STANDARD POLICY & PROCEDURE	P&P Number 340
Issuing Department: Sales & Marketing		Date Issued 07/01/2005
For Corporate Use Only Sanofi Pasteur Inc.		
Pages: 3		Revision Date
Title	Sanofi Pasteur- California Compliance Policy	

Preamble

Ethical relationships with health care professionals are critical to the mission of Sanofi Pasteur. An important part of achieving this mission is ensuring that health care professionals have the latest, most accurate information available regarding our products. This Policy, developed consistent with the PhRMA Code on Interactions with Healthcare Professionals, the Office of Inspector General's Compliance Program Guidance for Pharmaceutical Manufacturers, and California statutory requirements, focuses on our interactions with health care professionals that relate to the marketing of our products.

Effective marketing of our products ensures that patients have access to the products they need and that the products are used correctly for maximum patient benefit. Our relationships with health care professionals are critical to achieving these goals because they enable us to –

- *inform health care professionals about the benefits and risks of our products,*
- *provide scientific and educational information,*
- *support medical research and education, and*
- *obtain feedback and advice about our products through consultation with medical experts.*

As we interact with the medical community, we are committed to following the highest ethical standards as well as all legal requirements. It is important that our interactions with health care professionals be perceived as appropriate by patients or the public at large. This Policy reinforces our intention that our interactions with health care professionals are to benefit patients and to enhance the practice of medicine. This Policy is based on the principle that a health care professional's care of patients should be based, and should be perceived as being based, solely on each patient's medical needs and the health care professional's medical knowledge and experience.

This Policy addresses interactions with respect to marketed products and related pre-launch activities. It does not address relationships with clinical investigators relating to pre-approval studies.

1.0 General

- 1.1 No hospitality, entertainment, or gift shall be provided to any health care professional (a) in exchange for an explicit or implicit agreement to purchase, prescribe, dispense, refer, or recommend a Sanofi Pasteur product, or (b) as explicit or implicit appreciation for purchasing, prescribing, dispensing, referring, or recommending a Sanofi Pasteur product.
- 1.2 Associates must never provide any hospitality, entertainment, or gift to a health care professional if any part of the purpose is to induce, or in return for, the purchase, prescription, etc. of a Sanofi Pasteur product.
- 1.3 Textbooks that serve a genuine educational function and that are reasonably related to a Sanofi Pasteur product or a disease state of interest to Sanofi Pasteur may be provided to health care professionals. The value of any textbook must not exceed approximately \$100. Associates may provide no more than \$100 worth of textbooks per year to any individual recipient. Prior to distribution, the Medical, Legal, and Regulatory Board must approve all textbooks, and any use of Sanofi Pasteur's corporate or product logos or names in connection with a textbook.
- 1.4 All gifts to health care professionals must be modest and must either primarily entail a patient benefit, or be primarily associated with a healthcare professional's practice. All gifts must conform to all relevant state requirements. Questions concerning these requirements and the appropriateness of gifts or entertainment should be directed to your immediate supervisor. All associates are responsible for knowing any specifically applicable state laws or regulations.
- 1.5 Please refer to your respective Public Health Manager for guidance regarding the provision of hospitality and gifts to state and federal government employees.
- 1.6 For purposes of section 1.4, modest is defined as having a retail value of \$25.00 or less. On an annual basis, Sanofi Pasteur has established an annual dollar limit on gifts, promotional materials, or items or activities to an individual health care professional that is consistent with the standards established by California Health and Safety Code § 119400-402.

2.0 Responsibilities

- 2.1 *Vice President of Customer Alliances Responsibilities:* The Vice President of Customer Alliances, through department staff and in collaboration with the Vice President, Marketing are responsible for communicating and administering this Policy and for providing direction to all levels of management on its interpretation.
- 2.2 *Manager Responsibilities:* It is the responsibility of managers to communicate the guidelines set forth in this Policy, ensure compliance with these guidelines and set a

personal example of the appropriate conduct of interactions with health care professionals.

- 2.1 *Employee Responsibilities:* Employees are responsible for adhering to the guidelines set forth in this Policy, and for asking their managers if they have any questions or require further information regarding the appropriate conduct of interactions with health care professionals.

- 2.2 *Chief Compliance Officer Responsibilities:* The Chief Compliance Officer is responsible for developing, operating, and monitoring the compliance program, including the development and implementation of regular, effective education and training programs for all affected employees; an effective line of communication between the compliance officer and all employees, e.g., a hotline; using audits and/or other risk evaluation techniques to monitor compliance; and the development of policies and procedures addressing the non-employment or retention of individuals or entities excluded from participation in federal health care programs and for the investigation of identified instances of noncompliance or misconduct.