COMPLIANT PRODUCT PROMOTION

We promote our products to healthcare professionals (HCPs) so they can make informed choices that benefit and protect their patients' health. To help protect patients, the government also regulates our promotional activities.

Only use Company-approved materials and stay consistent with Company-approved messaging.

Stay On-Label

- Only promote our products to HCPs who are likely to use them for their approved, on-label uses.
- Stay consistent with the product's FDA-approved label and only discuss approved uses.
- Do NOT discuss:
 - Unapproved or off-label product uses
 - Investigational products or use
- If an HCP asks about an off-label use or an investigational product/use, offer to submit their question to Medical Affairs.

Be Truthful, Accurate, and Not Misleading

- Do not minimize a product's safety risks or overstate a product's efficacy.
- Do not promote that a product is more effective or safer than what is supported by the approved PI.
- Do not make statements that suggest benefits not specified in the product label.
- Do not engage HCPs in discussions concerning competitor products except in accordance with Company-approved messaging.

Only Use Approved Materials

Only use materials in the manner and with the audiences for which they are approved.

Only use currently approved versions. Discard expired materials.

- Do not:
 - Alter approved materials in any way (no highlighting, underlining, or notes)
 - Create your own, homemade materials (even from approved content)
 - · Use training materials as promotional aids

Provide Fair Balance

- Balance efficacy and benefit claims with information about product risks.
- Provide information about warnings, precautions, contraindications, and adverse reactions.
- Always offer an HCP a copy of the full PI after a product discussion.

Email, Text, & Messaging

- Only use your Company email or mobile phone accounts or Company-authorized apps to communicate with HCPs.
- Only email or message HCPs for logistical purposes (eg, to set up appointments).
- Do not include a product name, therapeutic area, and/or disease state information unless previously approved.
- Never forward internal communications to HCPs.



Questions?

Contact your manager, Legal, or Compliance.