



Point of Care Communication Council

POINT OF CARE COMMUNICATION COUNCIL ETHICAL GUIDELINES

The Point of Care Communication Council (“PoC3”) represents healthcare media and information service companies at the Point of Care including physician office, hospital and pharmacy venues. PoC3’s primary objective is to advocate for the effective use of the Point of Care (“POC”) channel to advance health and healthcare outcomes. In support of the following objectives, the PoC3 sets forth the following ethical guidelines for its member companies.

Objective

POC engagement can help bridge the informational gap between pharmaceutical, consumer packaged goods, health & wellness, healthcare services, over the counter (“OTC”) and other companies and the patients/consumers they serve. Ethical interactions help ensure that medical and health decisions are made in the best interests of patients/consumers. For the benefit of Patients/Consumers, healthcare professionals, marketers and other POC stakeholders, PoC3 companies must adhere to the following principles:

Guiding Principles

1. Patient Focus means operating under the goal of benefiting patients/consumers through awareness, education, motivation, and compliance.
2. Integrity means dealing ethically, honestly, and respectfully in everything we do.
3. Honesty means being forthright in dealings with customers and stakeholders, operating within the relevant laws and regulations, and offering products of value consistent with what we claim in our communications.
4. Transparency means being open about our actions while respecting commercial sensitivities and intellectual property rights.
5. Accountability means being responsible for our actions and interactions.

Ethical Commitments

As applicable to the Member’s business model, each PoC3 Member shall:

1. Benefit public health by increasing awareness about medical conditions, educating patients and physicians about treatment options, and motivating patients to proactively engage in a dialogue with their health care providers. By encouraging more effective patient-provider dialogues, Members will help increase the likelihood that patients will receive appropriate care for conditions that are frequently under-diagnosed and under-treated, encourage compliance with prescription drug treatment regimens, and ultimately, help achieve better health outcomes;
2. Provide sponsors/advertisers with easy to understand media and service agreements that clearly spell out terms of service and reach deliverables. Members shall comply with such



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terms of agreements and shall proactively advise sponsors when or if they are unable to meet specific reach or other contracted deliverables and issue appropriate make-goods if necessary;

3. Not misrepresent the current status of service (e.g. deceptively advise that a cancellation request has been received) or misrepresent ownership of equipment to any healthcare provider. Members shall also respect the property rights, including intellectual property rights of content of competing POC companies. In addition, members shall work with the healthcare provider to proactively give notice to a competing POC company when a displacement has been secured so that Members can make arrangements to retrieve installed equipment;

4. Not knowingly misrepresent a description of competitive POC company services to a sponsor, health system or health care provider, or make any solicitation based on knowingly false or misleading information or deliverables;

5. Clearly identify the source of audience, viewership and/or volume metrics, clearly delineate the source of such metrics, and not knowingly manipulate such source's reports. If providing clients with location detail upon request, information must be accurate and up-to-date and, where applicable, contain accurate and current information regarding associated Physicians/Healthcare Professionals;

6. Comply with all applicable laws and regulations and not provide compensation and/or services which violate applicable regulations and PhRMA Guidelines;

7. Handle confidential and protected health information (PHI) professionally and comply (when applicable) to all relevant state and Federal privacy laws including but not limited to HIPAA and HITECH;

8. Treat all PoC3 member and Board and Member discussions as confidential unless expressly recognized as information designed to be disseminated to the broader industry.

Accountability

Each PoC3 Member will develop internal policies and procedures related to the Guiding Principles and Ethical Commitments to ensure compliance.

Failure to abide by the above sections regarding Guiding Principles and/or Ethical Commitments may result in loss of membership in the PoC3 as determined by its Board of Directors.