

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 to be: 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, Each PoC³ Member Company 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 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

PoC³ member companies are committed to ensuring compliance with the Guiding Principles and Ethical Commitments. Companies which declare their intention to abide by these Guiding Principles and Ethical Commitment will complete an annual audit process conducted by an approved PoC³ auditor. Furthermore each member agrees to provide an annual certification that they have internal policies and procedures in place to foster compliance, and will be considered Signatory providers and identified as such on PoC³'s public website.

Each PoC³ member company will develop internal policies and procedures related to the Guiding Principles and Ethical Commitments to ensure compliance. The Verfications and Validations Committee of the POC³ is responsible for receiving comments from the general public and health care professionals regarding healthcare advertising conducted and services conducted by Signatory providers and their adherence to these Guiding Principles.

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