



HOW WE
WORK

THE PHARMA
INTELLIGENCE
CONSTITUTION

COLLEAGUES

BUSINESS
PARTNERS

CUSTOMERS

ASSETS AND
INFORMATION

ENVIRONMENT

COMMUNITIES

INVESTORS

SPEAKING UP

FURTHER
INFORMATION

How we work at Pharma Intelligence

Our Code of Conduct



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Introduction to How we work at Pharma Intelligence

Pharma Intelligence operates in the Knowledge and Information Economy, providing drug, device, company, clinical trial and market intelligence in the pharmaceutical and medtech markets.. This focus is mirrored with a diverse mix of specialist talent and expertise amongst the colleagues who work here

And what we all share is a collective focus on championing the specialist markets and customers we serve, by connecting them with knowledge. How we go about that, day to day, is also guided by a common set of principles and beliefs.

This document is our Code of Conduct and it provides detailed information around our commitments and expectations of behaviour and practices, in the areas that matter most to us as a business, and in the areas that those who work with us believe are important.

Whether it is around the quality and accuracy of the content we create, how we protect business and customer information, how we contribute to the communities we work within, maintain fair and ethical practices, and support each other, this Code applies to all colleagues at Pharma Intelligence, including consultants and contractors, and is also relevant to the businesses that we choose to partner with.

What underpins the way we work is our focus on operating the business for the long-term, by choosing what is best and most sustainable for us and for our customers in all that we do.

We take our commitments seriously, and look to follow both the spirit and the letter of this Code and its supporting policies in how we conduct business.

Additional information and support is available in each area, and I would encourage anyone who has questions or requires assistance to connect and make the most of those resources.

It is only by earning trust, paying attention to the detail and building partnerships that we can continue to be successful as a business, deliver for our customers and make a positive contribution to the communities in which we operate.

Ransey Hashem

Chief Executive



Connecting with our Purpose

The Pharma Intelligence vision set out our purpose that underpins and shapes how we work, collectively and individually.

We have organised this Code of Conduct to provide guidance on how we should connect with key stakeholders and processes, to make informed decisions and live the Pharma Intelligence vision in a real and responsible way.

Our Vision

Our ambition is to become the worlds most trusted partner for essential evidence and actionable insights on which health scientists can act now.

Every patient deserves treatment, every treatment deserves evidence.

Prove it. Together



Using How we work at PI

How we work at Pharma Intelligence is our Code of Conduct. It is designed to ensure colleagues have the guidance and information needed to develop and sustain long-term and mutually beneficial connections with customers, business partners, investors, the communities in which we operate and one another.

We are each responsible for ensuring we remain familiar with this Code and associated Global Policies and for completing any training provided. If any of the sections are particularly relevant to your role, you can talk to your manager, visit our intranet site or contact Compliance to find out more.

The Code of Conduct cannot and is not designed to cover every situation. If you are facing a dilemma, consider the following:

Does it meet regulations and the law?

Does it align with our Guiding Principles?

Is it consistent with our policies?

Would I feel proud if my action became public?

If the answer to any of these questions is “no” or you are unsure, please talk to your manager or consult Compliance or Legal, or one of the teams listed in this document.

Who does this apply to?

This Code applies to everyone who works for Pharma Intelligence or on Pharma Intelligence’s behalf, including colleagues, contractors and temporary or third party workers.

Each of us should act in a way that meets both the letter and spirit of this document and Guiding Principles. We take our legal, social and ethical responsibilities seriously and breaches of the Code and its supporting Global Policies, or actions that undermine our Guiding Principles, could significantly affect colleagues, the business and our reputation.

We all share responsibility for ensuring this does not happen, and any violations of these principles, whether intentional or not, may be subject to disciplinary action, up to and including dismissal.

Leading at Pharma Intelligence

If you lead other colleagues at Pharma Intelligence, you have a particular role to play in promoting a culture and ensuring a way of working that supports our Code and our Guiding Principles. Specific responsibilities for leaders and line managers include:

- Lead by example, by displaying and actively promoting the behaviour expected of all colleagues at Pharma Intelligence and challenging those who do not meet our standards
- Create an environment where colleagues feel able to share their views and have open conversations, particularly around challenging issues or conflict
- Ensure updates on policies and standards and messages from Compliance are shared and understood by your team
- Encourage colleagues to feel comfortable speaking up if they experience or witness misconduct and support them to report any concerns
- Protect from retaliation anyone reporting a concern in good faith or participating in an investigation
- Ensure your team undertakes all required training and maintains their familiarity with **How we work at Pharma Intelligence** and our Global Policies



Our connection with... colleagues

Our business is wholeheartedly a people business: the way we champion customers, connect people with knowledge and succeed as a company is through the efforts, engagement and contribution of colleagues. We believe that we get to better answers by combining skills and talents, embracing ideas wherever they come from and maintaining a supportive working environment.



Respect and support

All colleagues should feel that they and their contributions are respected and valued at work. To support this, we are committed to providing a working environment in which colleagues feel included and are able and encouraged to participate.

We do not tolerate any behaviour that undermines this commitment or makes anyone feel unsafe or unwelcome, including discrimination, bullying, and harassment.

This commitment is not limited to our offices. Colleagues who habitually work away from the rest of their team, either at a different location or from a home office, should not feel unsupported or unequal because of their place of work.

We encourage colleagues to report any behaviour that they genuinely believe to be improper, unethical or inappropriate and we have zero tolerance for any form of retaliation for raising such concerns.

Pharma Intelligence respects and seeks to uphold individual rights to freedom of expression, as an integral part of the way we engage with customers and embrace ideas.

Equality of opportunity

As a provider of specialist products and services to a global and diverse customer base, it is an essential part of our success that we recruit and retain an international colleague base with a broad range of skills, experiences and ideas.

Our commitment to this equality of opportunity informs all aspects of how we operate, from recruitment, developing and promoting colleagues, to the opportunities and forums on offer, and how we go to market.

We aim to ensure that colleagues are treated equally, based on each person's skills, abilities and performance, and that employment decisions are not based on any legally-recognised personal characteristic or status, such as sex, race, colour or ethnicity, national origin, ancestry, citizenship, gender expression or identity, sexual orientation, religion, age, marital or parental status, physical or mental disability.



For further information, please read our [Diversity & Inclusion Policy](#)



Health, safety and security

As a business, we aim to cause zero harm, and each of us has a part to play in ensuring the health, safety and security of ourselves, colleagues, customers, business partners and the communities in which we operate.

All colleagues have the right to come home from work healthy and safe, and for that reason, each of us is responsible for understanding and following the health and safety laws and regulations that apply to any offices, events or external locations visited as part of work.

- We must understand health, safety and security considerations when planning any new projects, events, or business travel
- We should follow the support and advice given, completing any required training and making proper use of personal protective equipment or other equipment provided

Colleagues have a responsibility to call out any unsafe behaviour or safety hazards that are seen. If there is immediate risk, get the activity stopped where possible and report to your Health Safety & Security representative.

You can report any incidents, including near misses, using the [Incident Notification form](#) on our intranet site.

Security

Security processes help to safeguard our offices from unwanted visitors, protect our events and equipment and form part of all our working lives. We should always:

- Respect and follow any security or access processes in place at an event location or office
- Listen to advice about local security issues
- Ensure that the security of colleagues, customers and communities is integral to any event or project planning

Travelling on business

When travelling on business, follow the advice of the Travel team and book trips using the Pharma Intelligence travel booking tool.

Always take necessary precautions, especially if you are travelling alone, late or to an unfamiliar location. Consult your travel booking platform before you leave to understand local risks or travel requirements and ensure you stay up to date with any local travel risk advice.

Responding to unexpected events and emergencies

Unexpected events can impact any business. Careful planning is undertaken to try to ensure work can continue safely and effectively wherever we are and whatever has happened.

Business continuity plans and processes are put in place to assist this and ensure we stay secure and connected, and colleagues have a responsibility to stay up to date with these. In addition:

- Be aware of any emergency procedures, such as fire or earthquake response processes, for your office and any other office or event location you may be visiting
- Look after any visitors hosted at the office or location where you work: make them aware of any relevant processes and support them if anything happens



Work and wellbeing

We aim to ensure that all colleagues feel appropriately engaged, supported and welcomed at work. Excessive and ongoing stress can be detrimental to colleagues' health, wellbeing and their ability to participate at work. If you think that you – or anyone you know – is experiencing excessive stress for any reason, talk to your manager or local HR team in confidence for help and support.

Pharma Intelligence is committed to providing a positive working environment that allows colleagues to be at their best, where they receive fair recognition and competitive rewards for their skills and contributions, in compliance with applicable wage and hour laws.

Consumption of drugs and alcohol

Alcohol and drugs can lead to reduced effectiveness, impaired judgement and increased health and safety risks. We are all expected to demonstrate responsible behaviour and act in a way that will not have a detrimental effect on our reputation, violate the law, impact the safety of others or cause inappropriate conduct. The use of illegal drugs in our offices, events or event locations or while travelling on Pharma Intelligence business is strictly prohibited.



Conflicts of interest

We all have connections with people or organisations we trust, and it is natural that we turn to them when an opportunity arises.

A conflict of interest occurs if these personal connections or interests influence the actions and decisions we make on behalf of Pharma Intelligence, so that we may longer be acting in Pharma Intelligence's best interests.

A number of situations and relationships may create a conflict of interest, or the appearance of one. Examples could include a personal or family relationship with a colleague you manage or with someone who works at a competitor, having another job that interferes with your commitments at Pharma Intelligence, or misusing your position, business information or assets for personal gain. Similarly, some gifts or entertainment could create a conflict of interest because you might be influenced to act in a certain way because of them.

In most cases, potential conflicts of interest are unlikely to escalate into a problem, but it is essential we conduct all business in an honest, transparent and neutral way, and avoid even the appearance of bias or self-interest.

Where colleagues think there might be a potential conflict of interest, this must be disclosed, preferably in writing, to your line manager or Compliance or HR. They will ensure the situation is managed in a way that protects your own and Pharma Intelligence's reputation and will keep a record of any actions taken.



*For further information on managing conflicts of interest, please contact **HR, Legal or Compliance Manager***



Our connections with...

business partners

The partnerships we form with other businesses and individuals, including suppliers, vendors, agents and contractors, are integral to the success of Pharma Intelligence's products and services and our ability to connect people with knowledge. Whether they are long or short term engagements, each of the connections formed is important for creating mutual value and protecting our reputation.



Anti-bribery & corruption

Corruption and bribery can blight communities by distorting markets, diverting money from essential projects and making it difficult for businesses and individuals to succeed on merit alone.

We have zero tolerance for any and all forms of bribery or corruption and are committed to complying with all applicable anti-bribery laws. We expect all colleagues to act in accordance with this commitment, wherever they work and whoever they work with.

Colleagues must never offer, accept or authorise anything of value that has the intention of obtaining a commercial advantage for Pharma Intelligence.

We should ensure that all accounts and financial records are complete and accurate, and that there are no undisclosed or vague transactions that could conceal corrupt activity. This includes keeping appropriate records of gifts or entertainment shared with business partners.

When working with public officials, we should be especially careful to ensure that everything we do or say is above reproach and cannot be misinterpreted.

Gifts & entertainment

Giving or receiving gifts and hospitality can be an important part of maintaining and developing business relationships.

Even where it is not the intent, lavish or unreasonable gifts or entertainment can appear to be a form of bribery. The appearance of corrupt activity can be enough to put our reputation at risk and lose the trust of our partners.

- All gifts and entertainment must be moderate, appropriate, occasional and have a genuine business purpose
- Colleagues should never give or accept cash or a cash equivalent, such as gift vouchers, or offer or demand something in return
- No gifts or hospitality of any value can be offered or given to, or received from, any government or public official without first talking to Legal or Compliance
- Ensure details of any gifts and entertainment, given or received, worth over £150 (or local equivalent) are registered in the Gifts & Hospitality Register on ServiceNow and have line manager approval
- Record the details of the recipient's name, organisation and the business purpose when claiming expenses for gifts or hospitality given

What is a bribe?

A bribe can be anything of value, either offered or accepted, which is intended to influence an action, secure a business advantage or affect someone's professional judgment.

It can be anything of value or which creates a feeling of gratitude such as cash, gifts or hospitality, vouchers, shares, charitable donations, a job offer or an internship.

It can be large and lavish, or a small facilitation payment designed to encourage someone to perform a normal job more quickly.

A bribe does not even need to be handed over. The law treats bribes offered or requested the same as bribes given or accepted.

Remember - if you are offered or asked for a bribe, REFUSE, and report it to **Compliance** immediately.





Anti-competitive behaviour

We recognise that fair competition strengthens markets and supports consumers, and are committed to complying with competition laws wherever we operate.

Anti-competition laws may apply when we are engaging in sales, marketing and advertising for our products and services, undertaking corporate development activity such as acquisitions, launching a new product or entering a new market.

Colleagues must be aware of the laws that might affect our activities and should never enter into any agreements with any third party to divide or control the marketplace, or act in such a way that we manipulate it illegally to our benefit.

We should never, either directly or through an agent, enter into any agreement, in any form, with a supplier, competitor or other third party that involves:

- Fixing prices or any aspect of pricing, such as discounts or credit terms, at which we and a competitor will buy and sell products and services
- Dividing up or allocating or otherwise restricting marketplaces, territories, customers or any other definable market
- Attaching inappropriate conditions of sale
- Exchanging commercially sensitive information, including prices, costs, discounts, terms and conditions, sales, volumes or credit arrangements
- Influencing the outcome of a competitive tender or colluding with our competitors

In Europe we refer to 'anti-competitive' conduct, in the US we call it 'antitrust' and in China it is known as 'anti-monopoly' law.

Wherever you are in the world, the principles are generally consistent to ensure businesses don't take unfair advantage in the market place, in breach of local legislation. The laws are often complex, so always discuss any relevant matter with our Legal team.

Engaging with competitors

Owing to the nature of our business and markets, colleagues are likely to know or engage with representatives of our competitors, such as through trade associations, normal business networking or, in some cases, because they are former colleagues.

Colleagues should remain aware of the limits of the conversations we can have with those working for competitors, and ensure we do not share or become party to any disclosure of confidential or commercially sensitive information, however informally.

Colleagues joining Pharma Intelligence from a competitor should ensure they do not bring with them or make use of any confidential or commercially sensitive information from their previous employment.





Fair and ethical business practices

We seek to work with business partners who share our values, both in terms of the quality of the product or service they provide and the methods they use. All business partners must be selected with care to ensure they do not impact on our reputation by engaging in unethical or illegal behaviour, such as poor treatment of workers, unsafe practices or the use of bribes or facilitation payments.

Colleagues who manage a third-party relationship should ensure those partners understand that we have zero tolerance for any such behaviour, whether it is undertaken on our behalf, or during their work for us, or not.

Appropriate procurement processes should be used to carry out due diligence before partners are engaged, and these checks should be re-confirmed periodically during longer partnerships. Business Partners should be informed of the content of our [Business Partner Code of Conduct](#) and these considerations should be built into any contractual protections in place.

In addition, Colleagues should always ensure they avoid any actual or seeming conflicts of interest when engaging business partners, and use multiple bids for contracts wherever possible.

International trade sanctions

We are committed to conducting business in accordance with applicable international trade laws and sanctions.

Sanctions are measures imposed by governments and international organisations, such as the UN, intended to deter a range of activities, which may include political or military aggression, providing sanctuary for criminals or terrorists, developing nuclear or other weapons programmes, and abusing human rights.

This means we are restricted in our dealings with certain individuals, nations, or particular industries in some countries. We are careful to ensure we comply with all applicable international sanctions and screen transactions and third parties against relevant international watch lists.

Sanctions rules and restrictions are complex and change frequently. Colleagues should refer to the [Sanctions Policy](#) for assistance in determining whether such restrictions apply.



For further information on Sanctions, please contact [Compliance](#)



Modern slavery

and child labour

We believe that the practice of using modern slavery, child and forced labour has no part in any business or supply chain, and we seek to eliminate it from our supply chains.

This includes all forms of labour where the choice to work or not work has been removed, or where children's rights and freedoms have been affected including:

- Forced labour by using physical or mental threats, such as threats to loved ones
- Domestic servitude
- Debt bondage, where workers cannot pay off debts incurred to do the work, such as excessive agency or accommodation fees
- Removal of freedom to leave by withholding identity documents or moving workers to a place they cannot afford to leave
- Child labour, especially where children lose access to education and play, or the work is heavy, illegal or dangerous
- Human trafficking

Modern slavery is usually hidden. When visiting or working on an event, travelling on Pharma Intelligence business or visiting business partners, ensure you know what to look for and contact [Compliance](#) for advice if you see anything that concerns you.

When engaging in recruitment or procurement, we must ensure appropriate due diligence is carried out and choose business partners with care, especially in those territories or industries where there is a higher risk.

More information on what we do can be found in Pharma Intelligence's [Modern Slavery Statement](#), which is updated annually.

Human rights

We are committed to respecting internationally recognised human rights standards, including the UN Declaration of Human Rights, and we expect our business partners to do the same.

Human rights include the right to be treated equally, to life and physical security, to freedom of thought and expression, to decent working conditions, to freedom from slavery and to privacy.



Our connections with...

customers

Customers, and the way we champion and support them, lie at the heart of our purpose. Connecting people with knowledge to help them learn more, know more and do more relies on earning customers' trust and building confidence in our products and the way we go to market.



Marketing and advertising

The marketing and advertising we engage in and we provide as a service connects people and communities across the world with knowledge. We strive to ensure that all these communications show integrity and embody our Guiding Principles.

Our marketing must always reflect generally accepted contemporary standards of good taste and decency, both locally and globally, and we are responsible for ensuring the impact of our marketing is evaluated from the perspective of the target audience. We do not knowingly market to vulnerable groups or support those who do, or produce, host or distribute content that is disrespectful of human life or promotes hatred, violence or discrimination.

We strive to ensure that we market only to people from whom we have collected the relevant permissions.

We comply with all relevant advertising and sponsorship laws and regulations and adhere to the principles set out in the International Chamber of Commerce's Code of Advertising and Marketing. Any advertising or sponsored material must be clearly identified, respect diversity and equality, and should not seek to take advantage of vulnerable groups such as children.



For further information, read the [Responsible Advertising Policy](#)



Our content

We aim to produce information, news, insight, data analysis and content-based services of the highest quality, accuracy and integrity that our customers can trust and value.

We seek to ensure that, as far as is reasonably possible, the content we produce, publish and for which we provide a platform is responsible, unbiased and meets the highest standards of integrity. We respect the intellectual property rights of our authors and seek to avoid defamation and cultural misappropriation.

Colleagues must ensure:

- All work is fair and accurate, clearly differentiating between fact and opinion
- Information is obtained through straightforward means, unless justified by an overriding consideration of public interest
- Any significant inaccuracy or misleading statement is corrected promptly

Competing interests identified during any review process should be managed and avoided where possible, and no colleague should take private advantage of any information obtained in the course of their work.

Our [Editorial Code](#) sets out the publishing standards by which we operate. Every colleague involved in the creation or production of information is required to follow the principles of this Code and any other codes of ethics that apply to their information.

Equality of access to knowledge

Connecting people with knowledge is at the heart of what Pharma Intelligence does, and we support the belief that access to knowledge should not be limited because of race, colour, gender, religion or any other characteristic protected by law.

We are committed to improving the equality of access to the knowledge services we provide, and invest in technological solutions that support this aim, seeking to ensure, as a minimum, that we comply with applicable accessibility standards.



Our connections with...

Pharma Intelligence's assets & information

It is important that we recognise our shared responsibility to keep Pharma Intelligence operating effectively and respect the connection between the choices we make at work, and Pharma Intelligence's long-term and sustainable success.



Protecting PI's assets

Our business assets include our intellectual property, customer data, proprietary information, employee time, brands, funds, our facilities and offices, and other physical assets, such as laptops and equipment.

Colleagues should use company assets according to all applicable laws and regulations and ensure they are safeguarded against loss, theft, misuse or damage, which could affect the company's value, stability or ability to operate. Any funds, information, equipment, systems or other assets should be used for their proper business purpose and never for personal benefit, or for an illegal or improper use that could affect Pharma Intelligence's reputation or bring any of our brands into disrepute.

We should show a similar level of care for assets belonging to third parties, such as intellectual property, that we may encounter or make use of in the course of our work at Pharma Intelligence.

Decision making

We set a framework around the authorisation of financial expenditure, contracts and other commitments to safeguard our assets and protect against unauthorised transactions.

The **Delegated Authority Framework** describes the decision-making limits that are in place to ensure that the right people and teams are involved in these decisions and that the appropriate level of risk analysis has been completed before we enter into legal and financial commitments. Colleagues should make themselves aware of how these limits apply to them, and which decisions are within their authority or require additional approval.



*For further information,
please talk to your
manager or finance team*



Managing our information

and information systems

Our information is one of our most valuable assets, and we have both legal and commercial reasons to manage and protect it, and to ensure we can meet our customers' needs and maintain their trust. Each of us has a role to play in safeguarding Pharma Intelligence's data and systems and complying with applicable laws and industry regulations.

Acceptable use

Our information systems are primarily intended for Pharma Intelligence business. Limited personal use is permitted as long as it does not compromise colleagues' ability to complete their work or affect the security or performance of the systems.

All communications made using our systems should be professional in manner and must never contain anything offensive, harassing, discriminatory or abusive, or that could otherwise affect Pharma Intelligence's reputation.

If you use social media and can be identified as an Pharma Intelligence colleague, you should also be aware of the potential impact on the organisation of your actions online, including any messages or images you post or content you link or share. Colleagues should never share confidential company information on social media.

Never communicate on Pharma Intelligence's behalf unless this is a formal part of your role.

Privacy and personal data

We respect the right individuals have to privacy and are committed to managing and protecting personal information and data responsibly and in accordance with all applicable data privacy laws and regulations.

We collect and use personal information for a wide range of business purposes, including colleague payroll and benefit information, recruitment, marketing and sales, author and supplier payments, and customer invoicing.

Colleagues who are responsible for collecting, managing or using any personal data, whether this is from colleagues, customers or business partners, should ensure they follow these key principles:

- Be accountable: ensure you understand the laws and regulations that apply to you and any data you manage
- Respect individuals' rights: inform them about the data that is being collected and its purpose
- Use personal information responsibly: ensure the data is accurate, relevant, not excessive and not held for longer than is necessary

- Do not collect sensitive personal information, such as data on an individual's health, unless you have consulted [Privacy](#)
- Consider data privacy implications when any new processing activity is being planned
- Market compliantly: collect all the appropriate permissions from the individual and act according to that consent
- Ensure confidentiality and security: keep personal data secure to protect against accidental loss, theft or transfer

If you believe there has been a potential or actual data breach, **immediately** report it to Privacy via privacy.pharmaintelligence@informa.com





Securing our information

Whether it is stored on our systems or on paper, colleagues and any other parties who use or access Pharma Intelligence's information share a duty to maintain its confidentiality, integrity and availability and to follow the requirements in our [Acceptable Use policy](#).

Colleagues should remain alert to the risk of information security breaches and should take all reasonable steps to safeguard access to our systems, including:

- Using strong passwords and never sharing log in details with anyone
- Ensuring that they and anyone they manage only have access to the systems they need, and that any permissions are updated or removed quickly if they leave or requirements change
- Understanding how to identify and avoid common criminal activity and scams such as phishing
- Classifying information according to the [Information Classification Standard](#), and storing, sharing and disposing of it correctly
- Never sharing any information that is not in the public domain with anyone not authorised to see it, including other colleagues
- Using secure methods such as Microsoft Information Protection, if **sensitive** or **highly sensitive** information needs to be shared

Physical safeguards

Information security also relies on physical protections and colleagues must:

- Follow any security measures in Pharma Intelligence's offices or other work locations
- Guard against the loss or theft of any printed information or portable electronic devices, such as laptops or phones
- Ensure that any portable electronic devices are password protected and avoid storing company information on such devices for longer than is strictly necessary
- Avoid working on anything confidential in a public space or via a public network, or where it might be overlooked by someone unauthorised

Security incidents

If you experience or suspect an information security incident, such as lost hardware, a suspicious email or unauthorised sharing, report this immediately on [ServiceNow](#).



Our connections with... the environment

The sustainability of the natural environment is essential to our long-term business success. We aim to manage and address our impact on the environment and to encourage all colleagues to play a role, to help reduce risk and as part of doing what is best and most sustainable for us, our customers and our communities.



The environment

From the forests that supply our paper to the energy that powers offices and data centres, Pharma Intelligence businesses rely on natural resources to operate.

We also recognise that resource scarcity and climate change present opportunities and challenges for the markets in which we operate.

Resource use

Different Pharma Intelligence products use different types of resources, and colleagues should always seek to make the most responsible choice when specifying, selecting and consuming goods and materials.

This includes:

- Making conscious choices to use energy efficiently, such as using video conferencing
- Selecting products and suppliers with enhanced sustainability or responsible sourcing credentials
- Seeking ways to reduce waste and recycle or donate products wherever possible
- Engaging in efforts to reduce energy consumption in our offices



Our connections with... **communities**

The strength of the connections we form with local and customer communities is an integral part of Pharma Intelligence's approach to business, as well as an important contributor to our growth and success. We aim to support and participate in these communities in a way that is responsible and creates a positive effect.



Charitable contributions

and volunteering

All our businesses, offices, brands and colleagues are encouraged to form long term partnerships with charities that are relevant to and support the communities or industries in which they operate. We actively look for creative and effective ways to use our business resources to benefit charitable partners, including in-kind giving, fundraising and volunteering.

Every Pharma Intelligence colleague can spend up to four days per year volunteering, subject to local management approval, with a particular encouragement for volunteering professional skills. Colleague fundraising and volunteering activities are also supported through grants.

While we respect the rights of colleagues to support their preferred causes outside of work, we only assist registered charities and non-profit organisations that align with the company's values and meet certain criteria. We are unable to provide support for organisations that discriminate against others and any political or religious organisation that seeks to convert or persuade people to a particular religion or party.

Any donations or partnerships must also comply with our [Anti Bribery & Corruption Policy](#); charitable giving or volunteering should never be used to create a business advantage for Pharma Intelligence.



Political contributions

Pharma Intelligence does not make donations to political parties, candidates or campaigns in any of the countries in which we operate. We do not engage in lobbying on our own behalf. Where we are members of any broader industry associations, these will engage with governments as representatives of industry views, and not for a single issue.

We respect the rights of colleagues to participate in political activities and contribute to the political parties of their choice in their own time. Colleagues should never suffer discrimination because of their personal political affiliations or lack of them. Any personal political activity must take place outside work and not use our resources or make any claim of support on Pharma Intelligence's behalf.

Colleagues should not attempt to influence decision making in our favour by making or using a personal political contribution or connection. If you believe that your engagement in politics might create a conflict of interest, speak to your Legal or Compliance team.

Paying tax responsibly

We recognise that the taxes paid by companies like Pharma Intelligence help governments provide the vital services and infrastructure from which we all benefit, and that a fair and effective tax system is in the interests of tax-payers and the community as a whole.

Pharma Intelligence takes a principled approach to taxes, managing costs in accordance with our responsibilities to shareholders, and ensuring that we pay our taxes in full and on time, in compliance with both the letter and intent of the laws of the countries in which we operate.



Our connections with...

investors

The institutions who invest in Pharma Intelligence are the ultimate owners of the company. In all our connections with investors, we aim to build trust and confidence through the integrity of our information and engagement.



Insider dealing

A fair stock market depends on ensuring that no-one misuses inside information to gain an unfair advantage when trading shares or securities. Inside information is non-public information that could have an impact on a company's share price, such as news about financial results, acquisitions or important management changes. Market abuse of this type can seriously affect public confidence in a stock market and is illegal in most countries.

Anyone with access to non-public inside information about a company is not allowed to buy or sell shares in that company on the basis of the information they hold. If you have access to such confidential information, it should be handled carefully and never disclosed to anyone who is not authorised to have access, including family members, nor used as a basis to make recommendations to anyone about share trading.

Fraud of any kind is forbidden, including falsifying expense claims, misappropriating assets, falsifying sales information or dishonestly altering or leaving company records incomplete. In addition, colleagues should never facilitate others to evade paying tax or commit tax fraud, including other colleagues, contractors, customers and business partners.

Accurate records

and financial integrity

The accuracy and integrity of our information, including any data relating to business operations, is essential to maintaining the trust and confidence of all our business partners, including investors. We create and maintain full and accurate records in relation to all aspects of our business and in compliance with all applicable local laws and regulations.



Speaking up

We all share a responsibility to challenge and report any behaviour that is unsafe, inappropriate or that contravenes any of this Code, Global Policies or Guiding Principles.

It can sometimes be difficult to do this. It is possible to be unsure whether what you have observed, heard or suspected really is inappropriate, and feel that by speaking up, a colleague may be put in the spotlight. Ignoring an issue won't make it go away however, and if it carries on happening, this can result in more serious consequences for Pharma Intelligence and colleagues.

It is always better to ask a question or talk about a concern.

If you see or hear something that doesn't feel right, you can talk to:



Your manager



Compliance



HR



:Legal

If you would prefer to talk to someone in confidence or anonymously, contact Speak Up, our whistleblowing line.

Speak Up is run by an external third-party provider, Navex, and allows you to ask a question or report a concern in confidence and in your own language. Reports can be made via the web or by phone. For up to date website and phone details, please visit the Pharma Intelligence intranet site.

Zero retaliation

We have zero tolerance for any form of retaliation against anyone for raising concerns or reporting what they genuinely believe to be improper, unethical or unsafe behaviour, or for participating in an investigation of a possible breach of our Code.

If you believe that you are being retaliated against or you have observed retaliation, please contact Compliance.



Help and advice

For further assistance about any of these matters, please contact:



Your manager



Compliance



HR



Legal

Additional information

For additional information and guidance on the topics discussed in the Code, please read our Global policies.

- Acceptable Use
- Anti-Bribery and Corruption
- Data Privacy
- Diversity and Inclusion
- Editorial Code
- Gifts and Entertainment
- Health, Safety and Security
- Responsible Advertising
- Sanctions
- Business Partner Code of Conduct