



# Scorecards

Rating the 15 largest pharmaceutical companies<sup>1</sup>

Based on the report "From Policy to Practice"

<sup>1</sup> The 15 largest pharmaceutical companies globally based on market capitalization (excluding biotechnology companies).

## Introduction to Scorecards

ASN Bank will follow up on the findings in the Sustainalytics report (“from policy to practice”). We will engage in talks with the companies in our investment universe. In order to assess where the companies stand today and what progress they have made over the past two years, we have created scorecards to guide our dialogue with these companies.

We would like to elaborate on our line of thought. How did we arrive at this approach?

As an investor, we have identified serious misconduct in this industry for a number of years now. A closer look reveals that these controversies can roughly be divided into four topics: ethical conduct, development & distribution, marketing, and remuneration (volume driven sales incentives).

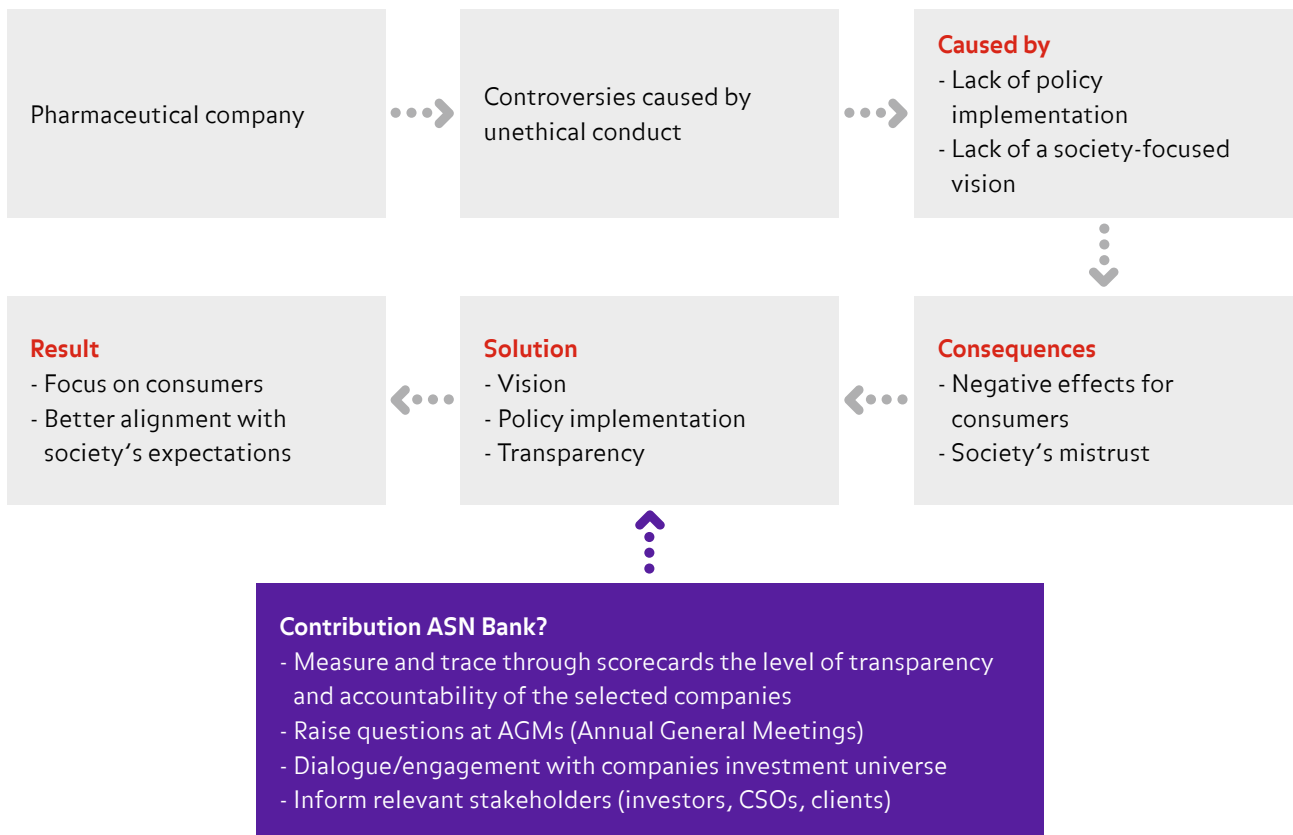
As most of the companies have proper policies in place for these topics, the primary cause of this misconduct – according to our analysis – is the lack of implementation of these policies and often also the lack of a vision that sufficiently addresses society’s expectations (developing useful, reliable and good medicines).

As a result, consumers suffer the negative consequences of misconduct and society’s mistrust of the industry is growing.

The industry can (hopefully) regain this trust by formulating a vision that focuses on society, by implementing policy, by being transparent and through accountability, allowing consumers and patients to have complete faith in its products once again.

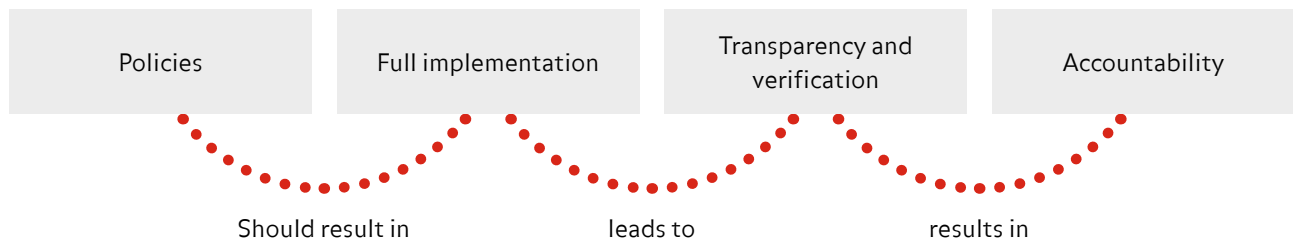
The industry still has a long way to go. Using the scorecards below, however, we will call companies to account about their vision (or their lack of a vision) and how they implement their policies and commitments.

Please find below the description and the elements that we assess across the four different topics: ethical conduct, development & distribution, marketing, and remuneration.



## The rationale behind our ratings

When companies adopt (relevant) policies, implement them, are transparent about the positive and negative effects and obstacles they encounter in practice they become accountable for their conduct. Which according to us, aside from an overarching vision, is the basis for better alignment with society. This is also how we have structured our scorecards. Below you will find a description of the ratings and the scorecards, 1 for each of the 15 companies addressed in the report.



## Description of ratings

1) **Not transparent and no procedures**

2) **Basic procedures**

The company has limited procedures in place to counter bribery and corruption and to promote ethical conduct.

3) **Internally implemented**

The company has internally implemented the basic procedures.

4) **Externally verified**

The company has internally implemented the basic procedures and subjects them to external verification.

5) **Transparent and accountable**

The company has internally implemented the basic procedures and discloses the findings of internal and external verifications. As a result, the company is transparent and can be held accountable for its responsibilities.

## Ethical conduct

*What procedures does the company have in place to counter conduct it has prohibited in its rules of conduct (such as bribery, corruption and fraud of and/or by staff and executives) and to promote ethical behaviour?*

• **Not transparent and no procedures**

• **Basic/minimum procedures**

The company has a whistleblower programme in place under which misconduct can be reported anonymously 24/7. The company actively informs staff of the policy and the whistleblower programme. Violations of the rules are subject to sanctions.

• **Internally implemented**

The company not only meets the basic procedures, but also engages in internal audits. Executives and managers are responsible for policy compliance. In addition, staff undergo annual training to ensure that they are familiar with the contents of the rules of conduct.

• **Externally verified**

The company not only meets the basic procedures and internal implementation, but also engages in external audits in addition to the audits that are legally required.

• **Transparent and accountable**

The company meets the basic procedures and internal implementation and engages in external audits. In addition, the company is transparent. It takes responsibility for its operations by declaring its rules of conduct applicable to third parties as well. It discloses the audits and the progress made in this regard. For example, the company publishes how many instances of misconduct have been reported and the measures taken.

## Development & distribution

*What procedures does the company have in place to develop, manufacture and distribute safe and healthy medicines?*

- **Not transparent and no procedures**
- **Basic/minimum procedures**  
The company monitors the safety of its medicines. It has an action plan in place that takes effect when misconduct is detected. It has a system in place to take action in case of emergency.
- **Internally implemented**  
The company not only meets the basic procedures, but also engages in internal audits.
- **Externally verified**  
The company not only meets the basic procedures and engages in internal audits, but also engages in external audits in addition to the audits that are legally required.
- **Transparent and accountable**  
The company not only meets the basic procedures and engages in internal and external audits, but is also transparent and takes responsibility for its operations. It publishes on successful and terminated clinical trials through independent sources, while disclosing the raw data of the tests. The company also publicly reports on the findings of the audits and the measures taken.

## Marketing

*What procedures does the company have in place to ensure that medicines are placed in the market in a responsible manner?*

- **Not transparent and no procedures**
- **Basic/minimum procedures**  
The company has joined or endorses leading initiatives in this regard. This also entails that the company has translated these into internal policies. The company applies specific guidelines and gives its staff pointers on how to deal with healthcare professionals. The company continuously analyses the risks of the markets in which it operates.
- **Internally implemented**  
The company not only meets the basic procedures, but also enforces internal compliance. The company ensures compliance by means of executive responsibility, inclusion of the basic procedures in internal audits and annual staff training, in order to make them aware of what is expected of them in this regard.
- **Externally verified**  
The company not only meets the basic procedures and internal implementation, but also includes this topic in external audits.
- **Transparent and accountable**  
The company not only meets the basic procedures, internal implementation and external verification, but is also transparent and takes responsibility for its operations. The company discloses misconduct as well as the action it has taken to resolve this misconduct. It also discloses what payments it makes to healthcare professionals. The company's aim is to terminate payments made to healthcare professionals for marketing purposes.

## Remuneration

*What procedures does the company have in place to encourage ethical conduct by employees through their remuneration?*

- **Not transparent and no procedures**
- **Basic/minimum procedures**  
The company's ambition is to terminate the sales volume-based remuneration of sales staff.
- **Internally implemented**  
The company meets the basic procedures and implements them internally by setting goals and deadlines.
- **Externally verified**  
The company not only meets the basic procedures and has implemented them internally, but also publicly reports on the progress made with the implementation of policy.
- **Transparent and accountable**  
The company not only meets the basic procedures, internal implementation and external verification, but is also transparent and takes responsibility for its operations. It does so by rewarding sales staff on the basis of the quality of their services instead of the number of products they have sold.

NB: Two additional remarks regarding the ratings:

- \* In some cases the company has a combined rating. For example "Internally implemented/Externally verified". This means that the company complies with some but not all elements of both ratings. It is literally in between ratings.
- \*\* In some cases companies comply with some but not all elements of a specific rating. In these cases we have given them the benefit of the doubt and awarded them this particular rating.

## Scorecard per company (in alphabetical order): P. 6 -20

- AbbVie	P. 6
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## AbbVie

AbbVie Inc. discovers, develops, manufactures, and sells pharmaceutical products worldwide. Including products for the treatment of autoimmune diseases; genotype 1 chronic hepatitis; HIV; testosterone replacement therapy; prostate cancer; Parkinson's disease and central precocious puberty. The company's products include HUMIRA, Kaletra, Synagis, Synthroid, Lupron, Duopa and Advicor. AbbVie Inc. was incorporated in 2012 and is based in North Chicago, Illinois.

### Ethical conduct

**Internally implemented**

The company received this rating because it meets all conditions for *internally implemented*. Its rating is insufficient for *externally verified* or *transparent and accountable*. Missing criteria include:

- External audits
- Disclosure of the number of whistleblower reports received, the types of misconduct and the measures taken

### Development & distribution

**Not transparent and no procedures**

**Basic procedures**

The company received this rating because it meets very few conditions. Some of the missing criteria include:

- Regular external product/service safety audits
- Public reporting on product/service safety audits

### Marketing

**Basic procedures**

The company received this rating because it meets all conditions for *basic procedures*. Its rating is insufficient for *internally implemented*, *externally verified* or *transparent and accountable*. Missing criteria include:

- Disclosure of all payments made to healthcare professionals
- Public reporting on monitoring outcomes, violations and corrective action

### Remuneration

**Not transparent and no procedures**

The company received this rating because it does not meet the conditions.

## AstraZeneca

AstraZeneca PLC engages in the discovery, development, and commercialization of prescription medicines for the treatment of cardiovascular, metabolic, respiratory, inflammation, autoimmune, oncology, infection, and neuroscience diseases worldwide. Its principal products include Onglyza, Iressa, Faslodex, Zoladex, Pulmicort and Seroquel XR. AstraZeneca PLC was founded in 1992 and is headquartered in London, the United Kingdom.

### Ethical conduct

**Internally implemented**

The company received this rating because it meets all conditions for *internally implemented*. Its rating is insufficient for *externally verified* or *transparent and accountable*. Missing criteria include:

- External audits
- Structures in place to process whistleblower reports

### Development & distribution

**Internally implemented**

The company received this rating because it meets all conditions for *internally implemented*. Its rating is insufficient for *externally verified* or *transparent and accountable*. Missing criteria include:

- Regular external product/service safety audits
- Public reporting on product/service safety audits

### Marketing

**Internally implemented**

The company received this rating because it meets all conditions for *internally implemented*. Its rating is insufficient for *externally verified* or *transparent and accountable*. Missing criteria include:

- Objectives and targets on ethical medicine promotion
- Disclosure of all payments made to healthcare professionals

### Remuneration

**Not transparent and no procedures**

The company received this rating because it does not meet the conditions.

## Bayer

Bayer Aktiengesellschaft develops, produces, and markets health care and agricultural products, and high-tech polymer materials worldwide. It offers prescription pharmaceuticals, such as medicines to treat hemophilia, multiple sclerosis, cancer, eye diseases, high blood pressure, and infectious diseases as well as consumer health products, including over-the-counter medications, dermatology products, nutritional supplements, veterinary medicines, and animal grooming products. It also provides products for medical care including blood glucose monitoring devices. Bayer Aktiengesellschaft was founded in 1863 and is headquartered in Leverkusen, Germany.

### Ethical conduct

**Internally implemented**

**Externally verified**

The company received this rating because it partly meets the conditions for *internally implemented* and *externally verified*. Some of the missing conditions are:

- Whistleblower programmes available to suppliers, customers and third parties
- Disclosure of the number of whistleblower reports received, the types of misconduct and the measures taken

### Development & distribution

**Internally implemented**

**Externally verified**

The company received this rating because it partly meets the conditions for *internally implemented* and *externally verified*. Some of the missing conditions are:

- Regularly tested emergency response procedures
- Public reporting on product/service safety audits

### Marketing

**Externally verified**

The company received this rating because it meets all conditions for *externally verified*.

Its ratings are insufficient for *transparent and accountable*. Some of the missing conditions are:

- Disclosure of all payments made to healthcare professionals
- Public reporting on monitoring outcomes, violations and corrective action

### Remuneration

**Not transparent and no procedures**

The company received this rating because it does not meet the conditions.



## Bristol-Myers Squibb

Bristol-Myers Squibb Company discovers, develops, licenses, manufactures, markets, distributes, and sells biopharmaceutical products worldwide. It provides chemically-synthesized drugs or small molecules, and biologics in various therapeutic areas, including virology, oncology, neuroscience, immunoscience, and cardiovascular. The company's products include Baraclade, Reyataz, Yervoy, Abilify and Eliquis. Bristol-Myers Squibb Company was founded in 1887 and is headquartered in New York, New York.

### Ethical conduct

**Internally implemented**

The company received this rating because it meets all conditions for *internally implemented*.

Its rating is insufficient for *externally verified* or *transparent and accountable*. Missing criteria include:

- External audits
- Disclosure of the number of whistleblower reports received, the types of misconduct and the measures taken

### Development & distribution

**Internally implemented**

The company received this rating because it meets all conditions for *internally implemented*.

Its rating is insufficient for *externally verified* or *transparent and accountable*. Missing criteria include:

- Regular external product/service safety audits
- Public reporting on product/service safety audits

### Marketing

**Basic procedures**

The company received this rating because it meets all conditions for *basic procedures*. Its rating is insufficient for *internally implemented*, *externally verified* or *transparent and accountable*. Missing criteria include:

- Disclosure of all payments made to healthcare professionals
- Public reporting on monitoring outcomes, violations and corrective action

### Remuneration

**Not transparent and no procedures**

The company received this rating because it does not meet the conditions.

## Eli Lilly

Eli Lilly and Company discovers, develops, manufactures, and sells pharmaceutical products worldwide. The company offers products for ailments such as diabetes, pediatric growth conditions, testosterone deficiency, products for the treatment of major depressive disorders, anxiety disorders, schizophrenia, bulimia nervosa and different types of cancers. Furthermore it provides animal health products, such as cattle feed additives, antibiotics to treat respiratory and other diseases in cattle, swine, and poultry. Eli Lilly and Company was founded in 1876 and is headquartered in Indianapolis, Indiana.

### Ethical conduct

**Internally implemented**

The company received this rating because it meets all conditions for *internally implemented*.

Its rating is insufficient for *externally verified* or *transparent and accountable*. Missing criteria include:

- External audits
- Disclosure of the number of whistleblower reports received, the types of misconduct and the measures taken

### Development & distribution

**Basic procedures**

**Internally implemented**

The company received this rating because it partly meets some of the conditions for *basic procedures* and *internally implemented*. Some of the missing conditions are:

- Regular external product/service safety audits
- Public reporting on product/service safety audits

### Marketing

**Basic procedures**

The company received this rating because it meets all conditions for *basic procedures*. Its rating is insufficient for *internally implemented*, *externally verified* or *transparent and accountable*. Missing criteria include:

- Compliance monitoring, including regular internal and external audits
- Public reporting on monitoring outcomes, violations and corrective action

### Remuneration

**Not transparent and no procedures**

The company received this rating because it does not meet the conditions.

## GlaxoSmithKline

GlaxoSmithKline plc creates, discovers, develops, manufactures, and markets pharmaceutical products, including vaccines, over-the-counter medicines, and health-related consumer products worldwide. The company offers pharmaceutical products for ailments in different areas, such as respiratory, cardiovascular, anti-bacterials, dermatology and vaccines. The company's products include Panadol, NiQuitin, Sensodyne, Aquafresh and Zovirax. GlaxoSmithKline plc was founded in 1935 and is headquartered in Brentford, the United Kingdom.

### Ethical conduct

#### Transparent and accountable

The company received this rating because it meets all conditions pertaining to *ethical conduct*.

### Development & distribution

#### Internally implemented

The company received this rating because it meets all conditions for *internally implemented*. Its rating is insufficient for *externally verified* or *transparent and accountable*. Missing policies include:

- Regular external product/service safety audits

### Marketing

#### Basic Procedures

The company received this rating because it meets all conditions for *basic procedures*. Its rating is insufficient for *internally implemented*, *externally verified* or *transparent and accountable*. Missing policies include:

- Compliance monitoring, including regular internal and external audits
- Disclosure of all payments made to healthcare professionals

### Remuneration

#### Transparent and accountable

The company received this rating because it meets all conditions.

## Johnson & Johnson

Johnson & Johnson, together with its subsidiaries, researches and develops, manufactures, and sells various products in the health care field worldwide. It offers consumer products such as LISTERINE, TYLENOL, BENADRYL and ZYRTEC. It offers pharmaceutical products in the areas of immunology, infectious diseases, neuroscience, oncology, and cardiovascular and metabolic diseases. It also offers orthopaedic medical devices for areas such as general surgery. Johnson & Johnson was founded in 1885 and is based in New Brunswick, New Jersey.

### Ethical conduct

Not transparent and no procedures

Basic procedures

The company received this rating because it meets very few conditions. Some of the missing criteria include:

- Procedures for corrective action
- Disclosure of the number of whistleblower reports received, the types of misconduct and the measures taken

### Development & distribution

Internally implemented

The company received this rating because it meets all conditions for *internally implemented*.

Its rating is insufficient for *externally verified* or *transparent and accountable*. Missing criteria include:

- Regular external product/service safety audits
- Public reporting on product/service safety audits

### Marketing

Internally implemented

The company received this rating because it meets all conditions for *internally implemented*.

Its rating is insufficient for *externally verified* or *transparent and accountable*. Missing criteria include:

- Disclosure of all payments made to healthcare professionals
- Public reporting on monitoring outcomes, violations and corrective action

### Remuneration

Not transparent and no procedures

The company received this rating because it does not meet the conditions.

## Merck & co

Merck & Co., Inc. provides health care solutions worldwide. The company's products include therapeutic and preventive agents to treat cardiovascular, type 2 diabetes, fungal infections, male pattern hair loss, and fertility diseases. It also offer antidepressants, cholesterol modification products and products to prevent chemotherapy-induced and post-operative nausea and vomiting. Further, it offers animal health products, such as antibiotics for poultry and fish, vaccines, and parasiticides. The company was founded in 1891 and is headquartered in Kenilworth, New Jersey.

### Ethical conduct

**Internally implemented**

The company received this rating because it meets all conditions for *internally implemented*. Its rating is insufficient for *externally verified* or *transparent and accountable*. Missing criteria include:

- External audits
- Procedures for corrective action

### Development & distribution

**Internally implemented**

The company received this rating because it meets all conditions for *internally implemented*. Its rating is insufficient for *externally verified* or *transparent and accountable*. Missing criteria include:

- Managerial responsibility for product and service safety
- Regular external product/service safety audits

### Marketing

**Internally implemented**

The company received this rating because it meets all conditions for *internally implemented*. Its rating is insufficient for *externally verified* or *transparent and accountable*. Missing criteria include:

- Disclosure of all payments made to healthcare professionals
- Public reporting on audit results, violations and corrective action

### Remuneration

**Not transparent and no procedures**

The company received this rating because it does not meet the conditions.

## Novartis

Novartis AG researches, develops, manufactures, and markets a range of healthcare products worldwide. It offers patented prescription medicines in various areas, such as oncology, cardio-metabolic, immunology and dermatology, retina, respiratory, neuroscience, and established medicines. The company's Alcon division provides various eye care products, including surgical, vision care products and ophthalmic surgical equipment. And generic pharmaceuticals such as antibiotics. Novartis AG was founded in 1895 and is headquartered in Basel, Switzerland.

### Ethical conduct

#### Basic procedures

The company received this rating because it meets all conditions for *basic procedures*. Its rating is insufficient for *internally implemented*, *externally verified* or *transparent and accountable*. Missing criteria include:

- External audits
- Company's code of conduct extends to third parties

### Development & distribution

#### Basic procedures

#### Internally implemented

The company received this rating because it partly meets some of the conditions for *basic procedures* and *internally implemented*. Some of the missing conditions are:

- Regularly tested emergency response procedures
- Regular external product/service safety audits

### Marketing

#### Internally implemented

The company received this rating because it meets all conditions for *internally implemented*. Its rating is insufficient for *externally verified* or *transparent and accountable*. Missing criteria include:

- Disclosure of all payments made to healthcare professionals
- Public reporting on monitoring outcomes, violations and corrective action

### Remuneration

#### Not transparent and no procedures

The company received this rating because it does not meet the conditions.

## Novo Nordisk

Novo Nordisk A/S, a healthcare company, engages in the discovery, development, manufacture, and marketing of pharmaceutical products worldwide. It offers products for diabetes care and products in the areas of haemophilia care, growth hormone therapy, and hormone replacement therapy. Novo Nordisk A/S was founded in 1925 and is headquartered in Bagsvaerd, Denmark.

### Ethical conduct

**Internally implemented**

The company received this rating because it meets all conditions for *internally implemented*.

Its rating is insufficient for *externally verified* or *transparent and accountable*. Missing criteria include:

- Company's code of conduct extends to third parties
- Disclosure of the number of whistleblower reports received, the types of misconduct and the measures taken

### Development & distribution

**Basic procedures**

**Internally implemented**

The company received this rating because it meets all conditions for *internally implemented*.

Its rating is insufficient for *externally verified* or *transparent and accountable*. Missing criteria include:

- Company's code of conduct extends to third parties
- Disclosure of the number of whistleblower reports received, the types of misconduct and the measures taken

### Marketing

**Internally implemented**

The company received this rating because it meets all conditions for *internally implemented*.

Its rating is insufficient for *externally verified* or *transparent and accountable*. Missing criteria include:

- Disclosure of all payments made to healthcare professionals
- Public reporting on monitoring outcomes, violations and corrective action

### Remuneration

**Not transparent and no procedures**

The company received this rating because it does not meet the conditions.

## Pfizer

Pfizer Inc., a biopharmaceutical company, discovers, develops, manufactures, and sells healthcare products worldwide. It offers medicines for various therapeutic areas, including inflammation, cardiovascular/metabolic, neuroscience and pain, rare diseases, products for oncology and dietary supplements. Well known products include Centrum, Advil and Nexium. Pfizer Inc. was founded in 1849 and is headquartered in New York, New York.

<b>Ethical conduct</b>	<b>Internally implemented</b>
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The company received this rating because it meets all conditions for *internally implemented*. Its rating is insufficient for *externally verified* or *transparent and accountable*. Missing criteria include:

- Company’s code of conduct extends to third parties
- Disclosure of the number of whistleblower reports received, the types of misconduct and the measures taken

<b>Development &amp; distribution</b>	<b>Not transparent and no procedures</b>	<b>Basic procedures</b>
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The company received this rating because it meets very few conditions. Some of the missing criteria include:

- Regular external product/service safety audits
- Public reporting on product/service safety audits

<b>Marketing</b>	<b>Not transparent and no procedures</b>	<b>Basic procedures</b>
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The company received this rating because it meets very few conditions. Some of the missing criteria include:

- Disclosure of all payments made to healthcare professionals
- Public reporting on monitoring outcomes, violations and corrective action

<b>Remuneration</b>	<b>Not transparent and no procedures</b>
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The company received this rating because it does not meet the conditions.



## Roche

Roche Holding AG operates in the pharmaceuticals and diagnostics businesses in Europe, North America, and Asia. It offers pharmaceutical products for ailments such as anaemia, cancer, cardiovascular, central nervous system, diabetes, hepatitis B and C, HIV/AIDS, infectious diseases, inflammatory and autoimmune, intensive care medicine and STD's. The company amongst others also provides diagnostic solutions for: blood screening; cancer screening; cardiovascular testing; cholesterol monitoring; diabetes monitoring and therapy; intensive care testing. The company was founded in 1896 and is headquartered in Basel, Switzerland.

### Ethical conduct

#### Basis procedures

The company received this rating because it meets all conditions for *basic procedures*. Its rating is insufficient for *internally implemented, externally verified or transparent and accountable*. Missing criteria include:

- Internal and external audits
- Procedures for corrective action

### Development & distribution

#### Internally implemented

The company received this rating because it meets all conditions for *internally implemented*.

Its rating is insufficient for *externally verified or transparent and accountable*. Missing criteria include:

- Prior registration of all clinical trials in reliable and publicly available databases
- Regular external product/service safety audits

### Marketing

#### Basic procedures

The company received this rating because it meets all conditions for *basic procedures*. Its rating is insufficient for *internally implemented, externally verified or transparent and accountable*. Missing criteria include:

- Incident investigation and corrective action
- Compliance monitoring, including regular internal and external audits

### Remuneration

#### Not transparent and no procedures

The company received this rating because it does not meet the conditions.

## Sanofi

Sanofi researches, develops, and markets various therapeutic solutions. Amongst which pharmaceutical products for the treatment of diabetes, pompe disease treatment, multiple sclerosis; breast, non-small cell lung, prostate, gastric, and head and neck cancers; thrombosis; hypertension; chronic kidney disease; epilepsy and products to treat acute rejection in organ transplantation. Its products comprise Lantus, Cerezyme, Taxotere, Thymoglobulin, Lovenox, Depakine and Ambien. Additionally, it offers consumer health care products and generic medicines; and vaccine and animal health products. Sanofi was founded in 1973 and is headquartered in Paris, France.

### Ethical conduct

#### Basic procedures

#### Internally implemented

The company received this rating because it partly meets some of the conditions for *basic procedures* and *internally implemented*. Some of the missing conditions are:

- Whistleblower programmes available to suppliers, customers and third parties
- Disclosure of the number of whistleblower reports received, the types of misconduct and the measures taken

### Development & distribution

#### Externally verified

The company received this rating because it meets all conditions for *externally verified*.

Its ratings are insufficient for *transparent and accountable*. Some of the missing conditions are:

- Public reporting on product/service safety audits

### Marketing

#### Basic procedures

#### Internally implemented

The company received this rating because it partly meets some of the conditions for *basic procedures* and *internally implemented*. Some of the missing conditions are:

- Regular risk assessments
- Incident investigation and corrective action

### Remuneration

#### Not transparent and no procedures

The company received this rating because it does not meet the conditions.

## Teva

Teva Pharmaceutical Industries Limited develops, manufactures, markets, and distributes generic, specialty, and other pharmaceutical products worldwide. It offers sterile products, hormones, narcotics, high-potency drugs, and specialty medicines for use in areas such as women's health and oncology. Its products comprise Copaxone, Azilect, Zecuity, Duoresp, Spiromax, Treanda and Trisenox. In addition, the company provides over-the-counter medicines in the categories such as cold and allergy, digestive wellness and vitamins. Teva Pharmaceutical Industries Limited was founded in 1901 and is based in Petach Tikva, Israel.

### Ethical conduct

#### Basic procedures

The company received this rating because it meets all conditions for *basic procedures*. Its rating is insufficient for *internally implemented*, *externally verified* or *transparent and accountable*. Missing criteria include:

- External audits
- Disclosure of the number of whistleblower reports received, the types of misconduct and the measures taken

### Development & distribution

#### Internally implemented

The company received this rating because it meets all conditions for *internally implemented*. Its rating is insufficient for *externally verified* or *transparent and accountable*. Missing criteria include:

- Regular external safety audits in respect of products and services
- Public reporting on product/service safety audits

### Marketing

#### Externally verified

The company received this rating because it meets all conditions for *externally verified*. Its ratings are insufficient for *transparent and accountable*. Some of the missing conditions are:

- Disclosure of all payments made to healthcare professionals
- Public reporting on monitoring outcomes, violations and corrective action

### Remuneration

#### Not transparent and no procedures

The company received this rating because it does not meet the conditions.

## Valeant

Valeant Pharmaceuticals International, Inc. develops, manufactures, and markets pharmaceuticals, over-the-counter products, and medical devices worldwide. These include the treatment of acne, depressive disorder, prostate cancer, herpes, and various products various eye care and treatment products. The company's products include Solodyn, Ziana, Wellbutrin XL, PROVENGE and Zovirax. Valeant Pharmaceuticals International, Inc. was founded in 1983 and is headquartered in Laval, Canada.

### Ethical conduct

**Internally implemented**

The company received this rating because it meets all conditions for *internally implemented*.

Its rating is insufficient for *externally verified* or *transparent and accountable*. Missing criteria include:

- Guidelines on what is considered appropriate behaviour
- Disclosure of the number of whistleblower reports received, the types of misconduct and the measures taken

### Development & distribution

**Not transparent and no procedures**

The company received this rating because it does not meet the conditions, except for:

- Policy objectives to guarantee product and service safety

NB: Valeant pursues a market strategy that is not focused on medicine development but rather on obtaining patents for medicines developed by other companies.

### Marketing

**Internally implemented**

The company received this rating because it meets all conditions for *internally implemented*.

Its rating is insufficient for *externally verified* or *transparent and accountable*. Missing criteria include:

- Disclosure of all payments made to healthcare professionals
- Public reporting on monitoring outcomes, violations and corrective action

### Remuneration

**Not transparent and no procedures**

The company received this rating because it does not meet the conditions.