EFPIA Code

Report on Ethics & Compliance Activities

July 2026

At EFPIA, the Ethics & Compliance activities are organised within the framework of the Codes Committee (composed of the representatives from the Member Associations) and the Ethics & Compliance Committee (composed of the representatives from the Member Companies and Associations).

Based on the EFPIA Code requirements, the Codes Committee must publish an **annual code report** which summarizes the work and activities which have taken place in connection with the implementation, development, and enforcement of the various national codes during the applicable year, based on the country reports provided by the Member Associations (**2025 National Code reports**).

In addition to these national Code reports, EFPIA includes in this report an overview of the Ethics & Compliance activities conducted by EFPIA during 2025 and into mid-2026.

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Status: FINAL

1. Codes Committee and Ethics & Compliance Committee Activities

a. Executive Summary

During the 2025–2026 reporting period, the EFPIA Codes Committee (CodCom) and the Ethics & Compliance Committee (E&CC) continued to strengthen the EFPIA self-regulatory framework and support consistent implementation of high ethical standards across Europe.

A key focus was preparing for the implications of the **New Pharmaceutical Legislation**, particularly the Advertising Chapter, and assessing the changes that may be required to the EFPIA Code. The Committees also continued to promote greater consistency across Member Associations by developing common guidance and sharing best practices.

Significant progress was made in **enhancing transparency and disclosure**. The E&CC endorsed a mandatory Patient Organisation (PO) disclosure template and continued the implementation of a harmonised methodological note for company disclosures, supporting greater consistency across the pharmaceutical industry.

The Committees also invested in **strengthening awareness of the EFPIA Code** through training and communication initiatives, including the publication of monthly micro-learning modules and the development of new Ethics & Compliance resources.

Finally, recognising the rapid evolution of digital technologies, the Committees continued to **monitor developments in artificial intelligence and digital communications**.

These initiatives reflect EFPIA's ongoing commitment to maintaining a robust, transparent and forward-looking self-regulatory system that supports ethical collaboration and reinforces trust in the pharmaceutical industry.

b. Codes Committee

The role of the EFPIA Codes Committee (CodCom) is to support the Member Associations in their national compliance activities and monitor the adoption of national Codes that are aligned with the EFPIA Code while taking into account local requirements.

In 2025-2026, the CodCom focused on the implications of the New Pharmaceutical Legislation (NPL) for the EFPIA Code while continuing to improve consistency and harmonisation across Member Associations through clearer guidance and common principles.

New Pharmaceutical Legislation (NPL)

The CodCom analysed the Advertising Chapter in the NPL.

From a Code perspective, the members identified the following provisions as priorities:

- Prohibition of comparative advertising not aligned with the SmPC
- Revised definition of Healthcare Professionals (HCPs)

- Transparency provision requiring national web portals to include links to disclosure platforms

These provisions are expected to require amendments to the EFPIA Code, particularly regarding the definition of HCPs, and the rules governing comparative advertising.

Social media and digital communications

Several Member Associations reported developments in relation to social media and digital communications, including:

- Guidance on the use of QR codes
- Development of rules covering social media, artificial intelligence (AI), and digital communication channels
- Expansion of existing digital and social media annexes to address influencers

In paralell, the CodCom drafted common principles governing corporate social media communications.

c. Ethics & Compliance Committee

Across the 2025-2026 period, the E&CC has also focused on the implementation of the General Pharmaceutical Legislation and other legislative initiatives, alongside the priorities established for 2025-2027. The most notable initiative was the introduction of a mandatory Patient Organisation (PO) disclosure template.

E&CC priorities

The E&CC 2024-2025 priorities continued to guide the initiatives in the 2025-2026 period. The E&CC priorities are:

Communication

The E&CC members endorsed the following actions to be implemented in this field:

- Develop dedicated branding for Ethics & Compliance materials and communications
- Create a central library for Ethics & Compliance resources
- Improve accessibility of the EFPIA Code through enhanced control, digital publication and reduced reliance on printed copies
- Launch an EFPIA Ethics & Compliance newsletter

Collaboration

The E&CC members continued to strengthen collaboration with MedTech Europe through joint initiatives and exchanges on common ethics & compliance topics.

Training

The E&CC continued to improve awareness and accessibility of the EFPIA Code through a range of training activities. The principal initiative was the monthly publication of micro-learning modules covering key provisions of the EFPIA Code on the EFPIA website.

Disclosure

Mandatory structure for the HCP/HCO methodological note

The objective of this initiative is to harmonise the methodological note across the pharmaceutical industry.

The mandatory structure has been incorporated into Annex B of the EFPIA Code.

Most Member Associations have already transposed the methodological note into their national Codes.

Standardised template for PO disclosure

Following the extension of the EFPIA disclosure survey in 2023 to include Patient Organisation (PO) disclosure, significant inconsistencies and lack of harmonisation were identified in companies' reporting practices.

The E&CC endorsed the introduction of a mandatory PO disclosure template (based on an improved version of the optional 2018 template) together with the necessary amendments to the EFPIA Code.

Artificial Intelligence (AI)

The E&CC held several workshops on the use of AI in compliance activities. Topics included the quality of the medicinal products information generated by large language models (LLMs) and the use of AI chatbots to support compliance functions.

In light of its growing importance, AI will be included in the E&CC priorities for 2027.

2. 2025 National Code reports

AUSTRIA – PHARMIG

Code authority activity
In 2025 there was no complaint filed under the PHARMIG Code of Conduct (CoC "VHC").

Code report
PHARMIG publishes the decisions made by the National Code Authority on its website in an anonymised way: https://www.pharmig.at/der-verband/pharmig-verhaltenscodex.
The Code activities are also part of PHARMIG's Annual Report. The report is available for member companies only.

2025 Disclosure of 2024 data
In 2024 ToV of 132 Mio. EUR to HCP, HCO and PO were made by pharmaceutical companies in Austria. Regarding 97,2 % of the ToV the recipients were HCP and HCO.

These 128,3 Mio. were split as followed:
- 60,- Mio. EUR (45,5 %) R&D
- 48,6 Mio. EUR (36,8 %) events
- 14,7 Mio. Euro (11,2 %) fees for services and consultancy
- 5,- Mio. Euro (3,7 %) donations and grants

Regarding the 3,7 Mio. (2,8 %) of ToV received by PO, these were split as followed:
- 3,5 Mio. EUR financial support
- 112.000 EUR non-financial support
- 107.000 EUR fees for services and consultancy

The yearly graphic of the disclosure overview can be found on PHARMIG's website:
https://www.pharmig.at/pharmaindustrie/transparenz

Code awareness
PHARMIG organised virtual training sessions and discussion platforms for its member companies on a regular basis. PHARMIG provides plenty of information material to its members regarding the CoC (e.g. fact sheets, checklists, notes for guidances, sample contracts). The FAQ regarding the CoC (available as an internal guidance for members only) are regularly updated by questions submitted by member companies.

Furthermore, via "PHARMIG Academy" seminars open to the public are offered. In 2025 among those there was a special certificate course on the PHARMIG Code of Conduct "VHC" consisting of four different modules: the CoC in general, advertising of pharmaceutical products, event in and with the pharmaceutical industrys, disclosure of transfers of value. Futhermore, the two introductiory seminars for newcomers in the

pharmaceutical industry or employees new in their role within a company, includes a session on the international self-regulation of the pharmaceutical industry, compliance in general, the Austrian CoC as well as the rules on advertising in the Austrian Medicinal Products Act. Besides, there are other legal and compliance seminars focusing on specific topics such as the use of Social Media in information and marketing of pharmaceutical companies.

PHARMIG issued various guidance documents for its members and extended the FAQ to the CoC.

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CROATIA – IF!

Code authority activities
No complaints received in 2025.

Disclosure
The figures are:

- R&D: 7.2 M eur
- HCOs: 8.8 M eur
- HCPs: 9.2 M eur

The level of positive consent rates: 17%

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CZECH REPUBLIC - AIFP

Code authority activities
No complaints received in 2025.

Consequences of Code authority activities
As there was not any case solved by the AIFP Ethics Committee, we are providing the most common issue discussed that could potentially culminate into the breach of AIFP Code of Practice:

- Reputational impact on the industry – within AIFP Ethics Committee and compliance working group, the still discussed topic are venues of the professional congresses as this is one of the most visible rules for the lay public. Although every member of AIFP is obligated to make very detailed assessment of each venue, there have been several congresses supported by AIFP members that were not in line with interpretative rules of the AIFP Ethics Committee. To provide the support

to members, AIFP Ethics Committee created a supportive document regarding the interpretation of the rules stated by the AIFP Code of Practice.

Disclosure
The figures are:

- R&D: 75 %
- HCOs: 12 %
- HCPs: 13 %

The level of positive consent rates: 24 %.
The association noticed that the rate of consents given by HCP to pharmaceutical industries to disclose the ToV is getting lower every year.

Code awareness: promotion of the ethical standards and best practice
A workshop for our members' employees was organised. This year, the topic was "work of the Ethics Committee". The tasks and overall agenda of the AIFP Ethics Committee were introduced, and it was explained how the AIFP Ethics Committee works and how the decision procedure looks – which aspects have to be taken into account and the overall discussion between members.
Beside this, a traditional event Day with the Ethics Committee is planned on November 2026. During this event the work of AIFP Ethics Committee is presented, including new documents prepared.

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DENMARK – ENLI

Executive Summary (Annual Report 2025)
In 2025 ENLI has continued its control and sanctions of the affiliated pharmaceutical companies to ensure that they comply with Danish law and the international, mainly European, business ethics codes particular to the pharmaceutical industry. The regulatory basis regulates the cooperation and exchange of information between the pharmaceutical companies and healthcare professionals, hospitals, patient organisations and public decision makers. Should the regulations be violated by an affiliated company, ENLI can impose fines and a number of other strict sanctions such as withdrawal of promotional material, require public corrections or similar sanctions appropriate to the specific violation.

ENLI's jurisdiction covers over 100 pharmaceutical companies on the Danish market.
For further information about the ethical codes, please visit www.enli.dk/en.

Significant matters in 2025

In 2025, approx. 415 activities aimed at HCPs were self-reported to ENLI each month, as required (pre-vetting procedure). Of these, the Investigator Panel has reviewed approx. 35% of the reports in a random control, and 98,6% of the activities were approved, whereas sanctions were decided in 1,4% of the evaluated reports.
Four complaints were filed in 2025 - three of them ended with a fine.
Affiliated pharmaceutical companies continue to exhibit a strong focus on achieving compliance to ENLI's regulation. ENLI's secretariat is available to affiliated companies every weekday by phone or e-mail, and many companies consult ENLI on marketing compliance issues.

In 2025, companies requested 49 pre-approvals of promotional activities, which is a decrease of nine request compared to 2024. Of the pre-approval requests in 2025, 37% were approved.
From the total amount of 63 decisions that ruled against an affiliated company, five decisions were appealed to the Board of Appeal, which corresponds to approx. 7% of all relevant decisions. Four decisions from the first instance were upheld, while one was changed.

ENLI has continued to prioritize preventive activities. In 2025, ENLI has published 28 decisions (including nine administrative reprimands), and four newsletters. Furthermore, ENLI has conducted nine courses in the regulation, primarily the Promotional Code, and three presentations to collaborative partners, networks, medical societies etc.
All decisions which impose a sanction on a company are published (in Danish) on ENLI's website, www.enli.dk, where also all ethical codes and guidelines can be found. Please visit www.enli.dk/en for more information on ENLI, the codes and guidances.

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FINLAND - PIF

Code authority activities
PIF handled 10 complaints in 2025:

- Inspection Board I (marketing and information to the consumers): 8 cases
- Inspection Board II (marketing to the HCP's): 2 cases
- Supervisory Commission (appeals on the decisions made by Inspection Boards): 1 case

The complaints came from:

- 6 cases at *the Inspection Board I* were initiated through PIF's own annual self-monitoring campaign. The theme was social media accounts of the member companies.
- Pharmaceutical companies: 4

In 8 cases, the Code was found to have been breached. The most frequently breached provisions is related to Rx marketing to consumers.
The sanctions imposed were from 2.000 € to 20.000 € with a otal of 68.000 € from all cases.

Consequences of Code authority activities
The biggest annual sanction was given on a case, where a company had off-label information and Rx product logos on a public disease awareness web page.

National Code report and publication of decisions
PIF publishes an annual report in Finnish on the cases handled in 2025:
www.laaketeollisuus.fi/media/julkaisut/toimintakertomukset/laakemarkkinoinnin-valvontakunnan-toimintakertomukset/lmvk-vuosikatsaus-2025.pdf

Disclosure
The figures are the following:

- R&D: 32.2M€
- HCOs: 6.8M€
- HCPs: 7.4M€

The level of positive consent rates is 95.5%.

PIF considered that switching to legitimate interest by majority of member companies has a very positive impact on the consent rate. An *aggregated* R&D sum total is so big in comparison to the other figures, that it is a major set-back form the aim of the industry trying to look transparent.

Code awareness: promotion of the ethical standards and best practice
PIF organized:

- Several information meetings/trainings for our members on a yearly basis
- Several meetings with HCP and PO organisations that work with pharma companies explaining the Code of Ethics and sharing best practices.

National Code provisions update
As a consequence of discussions with the national medicines agency, PIF updated the following provisions in 2025:

- A clarification was added to 26 § considering materials directed to nurses: Price and reimbursement information of Rx medicines is not allowed to be shared as part of guidance materials to nurses.
- The EFPIA Host Country Principle on local meal limits was added to 13 §.
- A reference to EFPIA's mandatory Disclosure Memorandum template was added to 129 §.
- It was added to PIF's Code of Ethics Q&A document (18 §), that the minimum information text of a product must be visible directly and presented in connection

with the advertisement displayed on an exhibition booth, unless it is a reminder advertisement. “Available at the stand” is not enough.

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GERMANY – FSA[1]/VFA[2]

Code authority activities

In the 2025 reporting period, 18 complaints were submitted to the FSA Arbitration Board (17 from third parties, 1 from member company). These complaints all related to possible non-compliance with the provisions of the FSA HCP/HCO Code.

The FSA Arbitration Board concluded 7 of these proceedings in 2025 (3 cases were discontinued for formal reasons (scope of code does not apply), 4 cases for material reasons (no breach of the Code)). 11 cases are still being processed in 2026.

On its website, the FSA provides regular information on all decisions of the 1st and 2nd Instances of the FSA Arbitration Board concerning violations of the Codes: Fachkreise - Freiwillige Selbstkontrolle für die Arzneimittelindustrie e.V.

National Code report and publication of decisions

FSA published a Code report which also informs about all decisions of the FSA Arbitration Board: FSA-Jahresbericht_2025_digital.pdf

Disclosure

The FSA has reported publicly on the yearly disclosure of its member companies: Transparenzveröffentlichungen 2025 - Freiwillige Selbstkontrolle für die Arzneimittelindustrie e.V.

The overall figure of the three main areas have proven to be stable over the years (R&D: 69,2%; HCO: 18,7%; HCP: 12,1%). The level of positive consent rose slightly from the previous year to 25%. It has to be stated, that the special situation in Germany with respect to individual consent of HCP continues (general sensitivity when it comes to data protection and data privacy; negative press coverage from the first disclosure years).

FSA/VFA and member companies continue to advocate to HCP to participate in the transparency initiative and support the efforts of pharmaceutical companies by giving their individual consent (e.g. FSA brochure explaining the transparency initiative of the research-based pharmaceutical companies and promoting the involvement of HCPs in this joint effort: FSA-Ihr-Beitrag-fuer-mehr-Transparenz_2026.pdf

Code awareness: promotion of the ethical standards and best practice

In 2025, the FSA conducted two meetings of the compliance officers of the member companies in Berlin to inform them about latest developments and share best practice.

[1] *Freiwillige Selbstkontrolle für die Arnzeimittelindustrie e.V. – „Voluntary self-regulation of the pharmaceutical industry”*
[2] *Verband Forschender Arzneimittelhersteller e.V. – „German association of research-based pharmaceutical companies“*

Several webinars were organized on currents issues as well as monthly update webinars. Furthermore, the FSA trained representatives of congress organizers and of medical societies via several webinars on the code rules. Moreover, the FSA regularly presents the compliance activities and objectives of the research-based pharmaceutical companies in Germany to the outside world, e.g., via presentations at third-party events, through debate contributions, FSA podcasts and social media.

National Code provisions update

In 2025, the FSA transposed the new Annex B of the EFPIA Code into its regulations (binding FSA Board guideline): FSA-VS-LL-zum-FSA-Transparenzkodex-2025-englisch.pdf

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GREECE – SFEE

Code authority activity

In 2026 until the date of this report, one complaint was filed under the SFEE Code of Ethics by a member company, in relation to a disease awareness campaign launched by another member company. The two companies were jointly invited to a mediation procedure, during which they settled the dispute amicably and no further actions were taken.

Disclosure

Transfers of Value (ToVs) from Pharmaceutical Companies to HCPs, HCOs and POs that took place during the year 2025 will be disclosed by June 30th 2026 at the latest, on both the relevant disclosure platform of the Greek National Organization for Medicines, as well as on the company website of each pharmaceutical company, according to paragraph 7 of article 66 of Law 4316/2014 regarding the obligation to disclose benefits. Additionally, by June 30th at the latest, each member company of SFEE is required to send by email to SFEE, the link from their respective website containing a publicly accessible list of POs to which transfers of value were made during the reporting period.

Code Training

Training sessions to promote compliance with the SfEE Code of Ethics, to be addressed to the Compliance and Medical departments of member companies, will be organized in Q4 of 2026.

National Code Provisions update

The SFEE Code of Ethics was amended during the works of the General Assembly held in April 2026 and the new Code entered into force on 3/4/2026.
The amendments refer to the following:

a) *Article 6, A.8. Patient information events*: This amendment aims to clarify matters related to awareness campaigns when interpreting the SfEE Code in combination with the relevant Circulars issued by the National Medicines Agency.
b) *Article 6, C1. Scientific events organised abroad by foreign PCs*: This amendment refers to this specific category of scientific events and aims to update the relevant conditions for participation.

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HUNGARY – AIPM

Code authority activity

No ethical cases were submitted or reviewed by AIPM Ethics Committee in 2025.
No ethical cases were submitted to the Communication Ethics Committee which is the Ethics Committee of the Code of Ethics for Pharmaceutical Marketing Communication which is the common Code of 4 Associations in Hungary.

Disclosure

The website of AIPM (https://aipm.hu/rolunk) provides the gateway to member companies' disclosure reports. The full report on Transfers of Value data for 2025 will be available as of end of July 2026.

National Code provisions update

The AIPM Code of Practice has not been modified in 2025.

Code awareness

AIPM has organised the first AIPM Expert Patient Advocacy Academy, a unique and much-needed initiative in Hungary. The Academy was designed to help patient representatives becoming strategic partners in healthcare and to equip patient representatives with the knowledge and skills needed to credibly represent patients' interests at both policy and decision-making levels.

The involvement of these experts ensured a high level of professional credibility and practical relevance throughout the programme. Participants had the opportunity to learn directly from individuals who shape, support or influence healthcare decision-making processes in Hungary.

Code related activities

AIPM Compliance Committee has started the review of legal provisions of the EU Pharma Package and has made awareness to the companies regarding the required modifications.

With respect to the fact that the scientific activity of MSL is not defined in the Hungarian law, there is an ongoing discussion with the Hungarian Medicine Agency about the status of MSL.
AIPM has submitted the modification proposal of the effective legal provision to define the status of MSL.

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IRELAND - IPHA

Code authority activity
The Irish Pharmaceutical Healthcare Association (IPHA) received no complaints in the calendar year, 2025.

Code report
IPHA publishes a Code report (Publication of Findings) that is available upon request.

2025 Disclosure of 2024 data

ToV Rollup Report Results

		Donations and Grants	Contribution to Costs of Events			Fee for Service and Consultancy		TOTAL
			Sponsorship	Registration Fees	Travel & Accomm.	Fees	Related Expenses	
HCPs	HCP – Individual	N/A	N/A	€1,087,744	€2,771,702	€1,446,487	€174,498	€5,480,431
	HCP – Aggregate	N/A	N/A	€20,817	€61,702	€84,219	€11,431	€178,169
HCOs	HCO – Individual	€2,019,148	€5,406,627	€2,774	€0	€1,181,008	€8,841	€8,618,398
	HCO – Aggregate	€0	€0	€0	€0	€0	€0	€0
R&D	R & D	N/A	N/A	N/A	N/A	N/A	N/A	€18,288,926
	Grand Total	€2,019,148	€5,406,627	€1,111,335	€2,833,404	€2,711,714	€194,770	€32,565,924

For 2024 data, the individual (named) level of disclosure is as follows:
- Healthcare Organisations (HCOs) - 100%
- Healthcare Professionals (HCPs) – 98% (a 2% increase for 2024 data compared to 2023 data).

National Code provisions update
A new version of the IPHA Code of Practice for the Pharmaceutical Industry became effective on 1st June 2025. The changes to the previous version were reviewed, deliberated upon and considered by IPHA's Board and took into consideration new

European requirements, amended working practices and the need for clarification on many points.

The key changes relate to Clauses 7.2 (conditions for adding a QR Code to promotional and informational materials); Clause 9 (conditions around the placement of reimbursement status notifications in medicine advertisements); Clause 16.3 (an increase to €90 [from €80] of the threshold for the provision of a meal); Clause 16.9 (simplifying the wording and requirements regarding the sponsorship of meetings convened by HCPs); Annex III, Patient Organisations (clarifying the restrictions around funding); Annex VI, Advisory Boards (clarification that a note taker can attend Advisory Board meetings in addition to the other attendees). There are other changes but many of these are administrative (addition of specific definitions, rewording etc). For transparency, a clean version of the new Code, a tracked changes version and a document outlining the key changes to the Code are available at www.ipha.ie/codes-of-practice.

Code awareness

IPHA conducts multiple training sessions annually, for full and affiliate members, on the most up to date version of the *IPHA Code of Practice for the Pharmaceutical Industry* and the Irish Legislation. Furthermore, access to IPHA Code e-Learning is available to all members 24 hours a day and 365 days a year at www.iphacode.ie.

Additionally, bespoke training is available for all member companies. This is where IPHA provides tailored training for individual companies at a location of choosing by the company (remote or in person). Furthermore, training aimed specifically for nurses working in the industry is also provided annually, as is training specifically for medical directors of IPHA member companies.

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LATVIA – SIFFA

Code authority activity

Ethics Commission of the Association of International Innovative Pharmaceuticals Producers (SIFFA)[3] examined 4 complaints that came from industry (incl. 2 about SIFFA members).

In 1 case no violation was found. In 2 cases, the complaints were about OTC medicines that are not within the scope of the Code of good practice and ethics (further – Code); their review is within the competence of the Health Inspectorate.

[3] SIFFA and Latvian Generics Medicine Association (LPMA) have a common Code and Ethics commission.

Violations were found in 3 cases of 4 regarding:

- advertising of prescription (Rx) medicine for HCPs – 25%;
- advertising of OTC medicine to the HCPs and public – 50%;
- not found violations - 25%.

The principles set out in the Code have been violated regarding Rx medicinal product advertisement for HCP's, incl. Article 3.05 (when comparing different medicinal products, relevant and comparable aspects must always be used; comparative advertising must not be misleading or disparaging) and Article 3.06 (the advertiser must take special care not to create a false impression about any of the statements or comparisons made in the advertisement (for example, if incomplete or statistically inadequate information are used)).
SIFFA website, where reviewed complaints are published: https://www.siffa.lv/lv/etikas-komisijas-lemumi/.

Consequences of Code authority activity
The Commission has discussed violations of the Code with drug manufacturers, including explanations in the area of enforcement of the Code and regulatory acts.

Code report
The annual report of the Ethics Commission has been sent to SIFFA members, but not published on the SIFFA website. National Code web link (English version) is at: https://www.siffa.lv/en/etika-un-atklatiba/

Code awareness
Companies publish data only on the platform of a state institution (Health Inspection) https://www.vi.gov.lv/lv/pazinojums-par-biedribam-nodibinajumiem-un-arstniecibas-iestadem-sniegto-materialo-vai-cita-veida-atbalstu-2, placing a link to this website on their websites. Data on the Health Inspection website are presented in an excel spreadsheet. The consent of HCPs is not required, as regulatory enactments require them to be made public.

Non-duplication of data is needed on the basis of EFPIA Board decision (01.07.2020), as well as taking into account that the Latvian regulatory enactments fully reflect the appropriate disclosure of the information specified in the EFPIA Code of Practice and national Code. The requirements for data disclosure are the same for all pharmaceutical manufacturers.

Health Inspection collects data by 30 May, compiles and publishes them no later than 30 June to comply with the Code. Companies have reported on the support provided by the owners of drug registrations or their authorized representatives to associations, foundations, medical institutions and subjects of pharmaceutical activity, amounts spent on research and development (R&D) and payment of lectures, consultations and

publications to specialists in 2024 for 9,82 millions euros, (accordingly in 2023 was 9,67, 2022 – 10,34M, 2021 – 6,35M, 2020 – 4,47M euros, incl. R&D sum).
Companies publish data on cooperation with patient organizations (PO) on their websites.

Other topics
The companies have been introduced to the EFPIA ETHICAL GUIDELINES APPLICABLE TO SOLUTIONS PROVIDED TO PATIENTS on December, 2024 and disscussed on February, 2025 meeting. The guidelines are translated into Latvian and added to the national Code.

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LUXEMBOURG - Innovative Medicines for Luxembourg (IML)

Code authority activities
No complaints received in 2025.

Disclosure
Please provide figures related to:

- R&D : 182 816€
- HCOs : 2 624 389 €
- HCPs : 389 918 €

Code awareness: promotion of the ethical standards and best practice
IML organises training sessions to promote compliance during each General Assembly.

National Code provisions update
The Code has been updated to ensure that it remains aligned with the latest EFPIA Code developments, with pharma.be requirements where relevant due to common membership, and with applicable local rules and regulatory expectations.
The update also served to improve the internal consistency of the Code, including certain definitions, cross-references, procedural references and drafting points, so that the document remains clear, coherent and operational for IML members.
Overall, the changes are therefore not intended to alter the fundamental ethical principles of the Code, but rather to keep the framework up to date, properly aligned and easier to apply in practice.

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MACEDONIA – Farmabrend Nova (FBN)

Code authority activity
No complaints or reports for FBN Code violations were received in 2025.
Members' activities are moderate due to limited access to innovative medicines (positive list not updated for 15+ years).

2026 Disclosure of 2025 data
Disclosure is going according to plan. No negative feedback has been received so far.

Code awareness
The Code is published on the FBN website here: https://fbn.mk/?attachment_id=3306

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NORWAY - LMI

Code Authority activity
In 2025 the Code Authority (Rådet) handled the following activities:
The Code Authority handled in 2025 3 cases and 6 Advanced statement cases. The Code provisions were breached in 2 of 3 complaint cases. 2 complaints were made by pharmaceutical companies, and one by the Secretariat. The provision in the case was mainly the LMI Industry Rules 7.1 (plain, factual balanced and objective), 7.3 (reminder advertising) and 7.9 (comparative advertising).
The sanctions imposed was a total of NOK 300.000.

Code report
The full Code report is published in Norwegian here: https://www.lmi.no/lmi/fagomrader/lover-og-regler/lmis-regelverk/
The cases are published in Norwegian here: Avgjørelser i rådet for legemiddelinformasjon

Code trainings
In 2025 4 different trainings were organized:
- 2 Advertising trainings (1-day)
- 1 Law and Industry Trainings (3 days)
- 1 Specialist Training 2 days (for compliance officers)

LMI also has a mandatory e-learning for all employees of the member companies.

Changes in the Code for 2025
In 2025 the rules on prescription classification in advertising, as well as those relating to medicinal samples and disease awareness information, have been updated to better align with both the EU Directive and more recent guidance from the authorities.

The Code has also been improved in terms of language and structure. This includes the chapter on transfers of value, which now provides clearer guidance on indirect transfers and companies' obligations. At the same time, the amendments clarify certain aspects of how the authorities interpret the rules, particularly regarding target audiences for prescription-only (Rx) advertising and the use of mandatory information.
Some of the changes have been made in the Code itself, while others are reflected in the supporting guidelines. Overall, these changes make the framework clearer, more up to date, and easier to apply in practice.

Disclosure
2025 disclosure of 2024 ToVs.
The figures are the following:
Transfers of Value (TOTAL: 254 million NOK)

- R&D 76,40%
- HCOs 12,20,%
- HCPs 11,40%

The percentage of HCP disclosure is 100%.

Advice and Control
During 2025, the Secretariat provided advice to pharmaceutical companies on a regular basis regarding the industry rules. The Secretariat also carries out frequent monitoring to identify deviations from, or breaches of, the Code.

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POLAND - INFARMA

Code authority activity
The Disciplinary Court of the Employers' Union of Innovative Pharmaceutical Companies INFARMA acts in accordance with the Statutes and the Rules of the Disciplinary Court.
The Disciplinary Court of INFARMA has two instances. The adjudicating panel is as follows:

- 3 Court Members – in the first instance,
- 5 Court Members – in the second instance.

On 12 June 2025, at the meeting of the General Assembly of INFARMA, the composition of the INFARMA Disciplinary Court has been approved for the cadences 2025-2028. The members of the Disciplinary Court include the Chairman, Vice Chairman and two members outside the member companies. Elections for the next mandate of the Disciplinary Court will be held in June 2028.
In 2025, no case was investigated by the Disciplinary Court.

Code report

The association does not publish a Code report but information on each violation of the provisions of the Union's Statutes, resolutions of the Union's governing bodies or Principles of Ethics established by the final adjudication of the Court and on the implemented sanctions is published in the newsletter issued by the Union.

All adjudications of the Court are available to Member Firms via the Ethics and Transparency Group's Intranet and can be used by Member Firms or the Union for internal training purposes.

The annual report of INFARMA's activities presented at the General Assembly includes information on the activities of the Disciplinary Court, the observance of the Code implementation and a summary of the activities of INFARMA and the Ethics and Compliance Group.

2025 Disclosure of 2024 data

The figures are the following:

- R&D 73,3%
- HCOs 13,9%
- HCPs 12,8%

The total value of payments made by Code signatories in 2024 increased by 26% compared to 2023.

The estimated percentage for positive consent is:

- HCOs 95,8%
- HCPs 27,9%

Annual reports published on the website:https://www.kodeksprzejrzystosci.pl/raport-przejrzysto%C5%9Bci/

In 2025 no significant changes in comparison with 2024 ToV, but an increase of HCP consents was noted.

The overall figure of the three main areas have proven to be stable over the years.

General trends (2015-2024):

- Increase of HCP consents from 22% to 31% in 2021 and decrease from 2022 to 2025 to 27,9%
- Stable level in TOTAL ToV amount with the tendency to incease
- Relatively stable proportions of ToV distribution (in share / %)
- Annual increase in R&D expenditure in Poland

On 26-30 June 2025, the Signatories of the Transparency Code published on their websites reports on the scope and value of collaboration with the medical community, medical professionals and healthcare organizations, as well as aggregated data concerning allowances for research and development activities. On 3 July 2025, the aggregate data was published on INFARMA's website: www.kodeksprzejrzystosci.pl;

https://www.kodeksprzejrzystosci.pl/aktualnosci/publikacja-danych-dotyczacych-wspolpracy-firm-farmaceutycznych-ze-%C5%9Brodowiskiem-medycznym-i-organizacjami-pacjentow-za-2024-rok/

Code awareness

The INFARMA Code of Good Practices

In 2020 the INFARMA Code of Good Practices was adopted by 28 Signatories of the Code – 25 INFARMA member companies and 3 Signatories of the existing Codes. The Code is effective as of January 1, 2021.

Activities related to the Code in 2025:

1. Implementing changes to the certification system for scientific events in terms of funding sources for non-substantive elements.
2. Proper implementation of the Code and ongoing updating of the Q&A document to INFARMA Code of Good Practice.
3. Effective operation of the Event Certification System – education on INFARMA standards among both event organisers and INFARMA member companies.
4. Promoting transparency and increasing the percentage of published flows for HCP

INFARMA was involved in promoting the Code and idea of transparency. The association shares its experience in self-regulation, and presents good practices that contribute to building an ethical and transparent healthcare system and to giving the patients access to the most effective treatment.

The Event Certification System

The Event Certification System was introduced by INFARMA based on a decision of the member companies. INFARMA launched a pilot event certification system in 2017 with the aim to improve the functioning of the system and to implement the application in the full scope in 2018. In 2025 as many as 1936 events were submitted for evaluation in the certification system, of which: 1509 were F2F events, 163 hybrid events and 264 online events. 9 certificates were withdrawn upon discovery of a non-substantive programme. All events were re-submitted for evaluation and received a new certificate.

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SLOVAKIA – AIFP

Code authority activities

In 2025, the AIFP Ethical Committee (EC) received none complaint concerning a violation of the AIFP Ethics Code from the member company or public representative (third party). The AIFP Ethics Committee, at its meeting held on 13 November 2025, adopted a resolution initiating, proceedings ex officio against an AIFP member as the respondent in

relation to communication addressed to the public concerning medicinal products available only on prescription, due to suspicion of a breach of Article 3.1 and Article 11 of the AIFP Code of Ethics.

The AIFP Ethics Committee proceeded in accordance with Article 1.2.2 of the Procedures for the Assessment of Complaints regarding breaches of the AIFP Code of Ethics. The decision of the procedure was not adopted before the end of 2025. The EC meetings were held 5 times per year.

Other activities

Upon the requests from members and third parties, EC assessed the venues of the professional events supported by member companies. The part of the regular EC agenda is monitoring and assessment of the Non-interventional Clinical Trials (NCT). There has been 2 NCT reported in 2025.

AIFP Code of Conduct

The following amendments to the AIFP Code of Conduct have been approved in 2025:

1. The definition of Healthcare professional was changed in Annex 1 – Definitions: "Healthcare professional" means any natural person that is a member of the medical, dental, pharmacy or nursing professions or any other person who, in the course of his/her professional activities, may prescribe, purchase, supply, recommend or administer a medicinal product and whose primary practice, principal professional address or place of incorporation is in the Slovak Republic. Persons listed in Section 27 of the Act 578/2004 Coll. on Healthcare Providers, Healthcare Professionals, Professional Organisations in the Healthcare, and on amendment to and supplementation of certain acts, as amended shall also be considered a Healthcare professional.

2. The amendment of the provisions of the AIFP Code of Ethics in the area of regulatory topics following an initiative by AIFP members
    - Article 2 Information about Medicinal Products
    - Article 2.3 Clinically Significant Changes
    - Article 3 Promotional Material

3. The amendment of the provisions of the AIFP Code of Ethics following an initiative from an external stakeholder – Assoc. Prof. MUDr. Ivan Solovič, CSc., Univ. Prof. – President of the Slovak Pneumological and Phthisiological Society of the Slovak Medical Society (SLS).
   AIFP Ethics Code - Point 7 of Article 6.11 was supplemented as follows: "A professional event may also be held during a period in which the venue would normally be considered prohibited, provided that the professional event takes place on the premises of an institutional healthcare provider (hospital), is

intended exclusively for the employees of that provider, and the total duration of the professional event does not exceed 4 hours. Within the framework of such a professional event, neither the members nor the support provided by them may support the participation of a healthcare professional in the event through reimbursement of travel expenses or accommodation costs related to attendance at the event. If hospitality in the form of catering is provided at such a professional event, it must always be reasonable and proportionate to the nature and duration of the professional event."

These amendments to the AIFP Ethics Code were approved by the AIFP General Assembly.

Code report
The annual 2025 report of the EC was presented at the AIFP General Assembly meeting and was published on the AIFP intranet for all members.

Code Awareness
The Head of the Ethics WG, who is also a member of the AIFP EC, informs compliance leaders, members of the Ethics WG and General Managers about the activities of the Ethical Committee after every EC meeting and retrospectively brings topics from WG to EC. The chairman of the EC supported the discussion and proposed to discuss the topics at the Ethics WG.

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SLOVENIA – FarmaForum

Code authority activity
No complaints were received in 2025.

2026 Disclosure of 2025 data
The full report on Transfers of Value data for 2025 will be available as of 10 July 2026.
The gateway to member companies' disclosure reports is available here: https://www.farmaforum.si/en/forum/codes/

Code awareness
Forum members, compliance leads, and General Managers are regularly informed about Code requirements through internal meetings and dedicated sessions.

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SPAIN – FARMAINDUSTRIA

Code authority activity

Farmaindustria examined 2 cases in 2025 that came from the pharmaceutical companies.

The Code provisions that have been breached in the 2 cases are the following:

- Article 1. Marketing authorization for medicines (EFPIA Code Article 1 Marketing authorization).
- Article 3. Information on Medicines and its Substantiation (EFPIA Code Article 3 Promotion and its Substantiation)
- Article 5. Transparency in Promotion of Medicines (EFPIA Code Article 7 transparency of Promotion)
- Article 21. Monitoring of compliance with the code.

One case was settled by the jury, whilst the other is still pending.

Code report

The Code report is available at: https://www.farmaindustria.es/web/

2025 disclosure of 2024 ToVs

The figures are the following:

Transfers of Value (TOTAL: 784,5 million euros)

- R&D 52,90%
- HCOs 23,14%
- HCPs 23,96%

The percentage of positive consent is 100%

For transparency initiative success, we encourage countries to approach Personal Data Protection Authorities to be able to disclose all the ToV individually based on the "legitimate public interest ground".

Code awareness.

During 2023 the Code of Practice Surveillance Unit launched an initiative that aims to certify the degree of knowledge of the Spanish Code of Practice for the Pharmaceutical Industry.

During 2025 the 3rd edition of such a certification took place on June.

Detailed information available at:

https://www.codigofarmaindustria.org/sites/sarfi/certificacion.html

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SWEDEN – LIF

Code authority activity

The first instance (IGN) in LIF self-regulation system examined 70 cases, six cases where complaints. The second instance (NBL) in the LIF self-regulation system examined seven cases. Three of the cases were referred from IGN to NBL, two cases were appealed to NBL and two cases originating from National Medicines Agency. The part originating from the continuous supervision and monitoring performed by IGN represents 83 % of the total case volume.

In 2025, the complaints came from:

- Pharmaceutical Companies: 6,4 %
- Healthcare Professionals: 0,0 %
- National Code Committee: 83 % (IGN= first instance)
- National Medicine Agencies: 2,6 %
- Regional Formulary Committees: 1,3%
- Anonymous: 1,3 %
- Others (please specify): 0,0 %

The Code provisions have been breached in 46 cases, as assessed by IGN, and in general relate to promotion not consistent with SmPC, misleading, abbreviated prescribing information is missing, insufficient or has poor readability.
The second instance, NBL (handling escalations from first instance, and appeals), assessed a breach in 4 of 7 cases.
The sanctions imposed were fines, in general 110 000 SEK.

Consequences of Code authority activity

More ascertain boundaries have been established regarding the broadening of article 2 in LER (the possibility to use new data that is not explicitly found in the SPC) and the cases regarding that have started to decrease.
All decisions with a sanction are published in a database on Lifs website (https://www.lif.se/etik/ign-och-nbl/). On the same page more information about the Lif ethical code as well as a page for FAQ can be found.

Code report

The Code report is available at: https://www.lif.se/etik/ign-och-nbl/verksamhetsberattelser/

2025 disclosure of tranfer of values (ToVs) made in 2024

- Total disclosed value, including R&D and non-R&D, increased by 9.7 % to 895 million in 2024 from SEK 816 million in 2023.
  - R&D 79,6 %

- HCOs 19,6 % (consultancy fees and associated expenses, sponsorships, donations)
- HCPs 0,8 % (consultancy fees and associated expenses)

- The percentage of individual disclosures is:
  - 97 % of recipients (HCP and HCO combined; ToVs in relation to consultancy fees and associated expenses)
  - 97 % of recipients (HCP only; ToVs in relation to consultancy fees and associated expenses)

The proportion of individual disclosure has been maintained during the years since the disclosure requirements were introduced in 2015 and does not seem to have been impacted negatively by GDPR-enforcement.

National Code provisions update

- The code was updated in September 2025
  - Removed the requirement of compulsory text in patient material regarding prescription-only medicine that is distributed by healthcare.
  - Extends the time to report in Lif's collaboration database to no later than 3 months from the activity's completion or the project's start.
  - Included the mandatory structure in EFPIA's template for methodology notes regarding the disclosure of transfer of value to HCOs and HCPs.
  - Included the requirement for the report of transfer of value to HCOs and HCPs to be searchable, at least by the recipient's name, and downloadable from the publication in 2027 of transfer of value from 2026.

- Another update in the code was made in February 2026
  - The majority of the updates was made in chapter 2, section 1 in the Code: *Rules of interactions with the healthcare* due to the update of *The Agreement of Collaborations Rules* with the Swedish Association of Local Authorities and Regions.

Enquiries and Training on the Code

- During 2025, Lif responded to about 300 queries on the Swedish code.
- Lif organized four Code Training sessions, the IMA-Course, a two-day course, including formal test to get accredited in code compliance. Three in-person training sessions and one digital training session, and in total 140 attendees participated.

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SWITZERLAND

For many years, the Swiss pharmaceutical industry has applied internationally coordinated (see IFPMA[4], EFPIA[5]) self-regulation that goes beyond the law with the Pharma Code (PC[6]) and the Pharma Cooperation Code (PCC[3]). Pharmaceutical companies can voluntarily agree to abide with these codes (see lists of signatories[7]). The supporting organisation for pharmaceutical self-regulation in Switzerland is scienceindustries, whereby its Code Secretariat is responsible for the implementation of the codes. It follows the principle of non-adversarial conflict resolution in the case settlement and thus primarily takes on a mediating role. In 2025 too, its neutral assessment was always accepted by the signatory companies involved and compliance with the Code was quickly restored in each case.

Implementation of the Pharma Code

The number of proceedings dealt with in connection with the PC decreased overall (2025: 79; 2024: 100), while the number of reports from competitors increased (2025: 31 / 39.2% cases; 2024: 29 cases / 29 %). In 2025, one company reported itself. Once again, no proceedings were classified as potentially hazardous to health and therefore as serious. The average duration of proceedings decreased to 5.8 days in 2025 (2024: 6.7 days).

In 2025, a total of 79 proceedings were initiated. The lower number is partly due to Sharepoint, which made it possible to formulate formal errors in several documents in a single violation. The documents also contained fewer errors overall with regard to the mandatory information. Of the 79 proceedings, 74 (93.7%; 2024: 91 cases / 91%) were concluded after the advertising in question was corrected or the infringement was acknowledged and the required measures were implemented. In 5 cases (6.3% / 2024: 9%), no conduct in breach of the Code was identified. In four cases, there were delays due to the complexity of the issues (duration of proceedings > 30 days). As in the previous reporting year, no company had to be warned for not submitting the requested statement on time.

The Code Secretariat again did not carry out any mediation in 2025 (2024: 0), but was informed of 10 bilateral settlements (2024: 10), meaning the number remained unchanged compared to 2024.

In the reporting year, 74 pharmaceutical companies (2024: 79) sent a total of 15,056 specimen copies (2024: 13,460) of their promotional material and information; 99.9% of these were sent electronically (2024: 99.1%). The Code Secretariat reviews these on a random basis. Only 17 specimen copies reached the Code Secretariat by post. 67 companies now submit their specimen copies to the Code Secretariat via the Sharepoint, which was newly established in 2024.

[4] IFPMA
[5] EFPIA
[6] The provisions of the two codes are referred to in the Annual Report by "PC" and "PCC" with the relevant section number.
[7] Signatories of the Pharma Code / Signatories of the Pharma Cooperation Code

Identified violations of the Code

In total, 22 (2024: 30) different PC sections were examined as part of the 79 (2024: 100) procedures mentioned above. In 21.5% of cases, only one section was in dispute (2024: 21%); 13% involved two sections (2024: 10%) and 64.6% of cases involved three to eight sections (2024: 69%). The PC sections that were frequently objected to are listed below:

- Fundamental correctness of professional promotion (PC 24.1): increase to 16 violations (2024: 12).
- Unsubstantiated advertising claims and incorrectly cited references (PC 24.2): decrease to 51 violations (2024: 79).
- Promotional materials that did not contain all the minimum information on the medicinal product required by the PC (PC 24.4, 24.5): halved to 4 violations (2024: 8).
- Incomplete or inadmissible literature references (PC 25, excluding PC 25.1, 25.4.3, and 25.7): decrease compared to the previous year with 16 infringements (2024: 19).
- Missing indication that references can be requested from healthcare professionals (PC 24.2, 25.1, 25.4.3, and 25.7): 34 violations, down from 50 in 2024, these were systematically sanctioned for the first time in 2022.
- Reports of unqualified superlatives and comparatives (PC 25.8, 25.9): slight decrease to 14 violations (2024: 16).
- Ban on gifts (PC 15.1, 15.2 and PC 15.3): decrease to 1 violation (2024: 8).
- Promoting medicinal products or indications not yet authorized (PC 23.1, 23.2): decrease to 3 violations (2024: 5).
- Differences between the promotional claims and the medicinal product information as approved by Swissmedic at the time of authorisation (PC 23.3): slight increase to 8 violations compared with 6 in 2024.

As in previous years, it can be stated that the alleged violations of the PC in 2025 could not be classified as gross. Once again, it was not necessary to threaten to refer an arbitration matter to the competent state authority (PC 75.10) in 2025.

Support for further education and training events (section 3 PC)

In 2025, there have again been interventions by companies and the Code Secretariat in the implementation of the requirements for supporting continuing and further education events. In order to provide organisers and professional associations in particular with a simple guide, a "Checklist for pharmaceutical companies and organisers to check whether events for the purpose of postgraduate medical training or continual medical education may be supported" was published in 2023. Although this check list has well been taken into consideration, there are still repeated discussions, particularly with regard to the conference venue and the conference location.

At the beginning of 2025, the Code Secretariat therefore conducted a series of well-attended virtual training courses for professional associations and event organisers, during which it provided examples of how to use the checklist and apply it in individual cases. In 2025 also, the Code Secretariat again reviewed a large number of training and

further education events on its own initiative and at the request of companies or event organisers to determine whether they meet the requirements of self-regulation and based its assessment on the long-established international benchmarks (in particular IPCAA[8] and e4ethics[9]).
The Code Secretariat has also compiled a list of cases to supplement the checklist and made it available to the signatory companies. This list summarises important individual case decisions made by the Code Secretariat and is intended to serve as a decision-making aid for PC signatories when assessing a specific request for support. In addition to the training courses, the Code Secretariat was and continues to be in regular contact with numerous organisers and professional associations, with the mutual aim of ensuring that events are organised in accordance with the Code.

Implementation of the Pharma Cooperation Code

Between 20 and 30 June 2025, the signatory companies of the PCC disclosed the pecuniary benefits granted in 2024 to healthcare professionals (HCP - primarily doctors and pharmacists), healthcare organisations (HCO - primarily hospitals and specialist organisations) and patient organisations (PO) on their websites for the tenth time. This involved compensation granted directly or indirectly for cooperation in connection with prescription-only medicinal products in human medicine. With the exception of one company, all companies submitted their data on time.
The Code Secretariat compiled the figures for the 65 PCC signatory companies and arrived at the following picture for Switzerland by the end of July 2025: a total of CHF 252.8 million in transfers of value (ToV) were disclosed for 2024. In 2023 the figure was CHF 242.3 million, which corresponds to an increase of CHF 10.5 million. At CHF 8.1 million, an identical amount of benefits were paid to HCP as in the previous year (CHF 8.1 million). ToV to HCO increased to CHF 140.6 million compared to CHF 128.3 million in the previous year. ToV for R&D services decreased slightly from CHF 106 million in 2023 to CHF 104.2 million in 2024.
Once again, there was a certain shift in direct support towards HCO. Cooperation grants to HCO increased accordingly by more than CHF12 million to CHF 140.6 million. Grants for research and development decreased by just under CHF 2 million in 2024. In this area, the picture of grants from individual companies fluctuating sharply from year to year was once again confirmed, which can be explained, among other things, by the varying intensity of activities in the area of clinical research.
To ensure as much transparency as possible, disclosure should be made on an individual basis, i.e. by naming the person who received a benefit, which for reasons of data privacy requires the recipients to agree to the disclosure. Overall, the average consent rate for HCPs remained virtually unchanged in 2024 (from 94.9% in 2023 to 94.6% in 2024). The median rate was as high as 100%, which means that half of the PCC signatory companies were able to report HCP consent rates of 100%. The average consent rate for HCO increased slightly from 98% to 98.4%, with the median again at 100%. Overall, the

[8] https://www.ipcaa.org/public/international-healthcare-congress-guidelines/
[9] https://www.ethicalmedtech.eu/e4ethics/about-e4ethics/

consent rates were once again impressive, with a few companies able to achieve even better values. There are some significant discrepancies in the consent rates among the individual companies, which do not appear to be fully comprehensible. Three companies that achieved an HCP consent rate of less than 80% for the reporting year were therefore listed by name on the scienceindustries website (for reporting year 2023: 5 companies) and asked to identify measures to increase their consent rates. This shows a welcome development, as the number of companies that had achieved less than 80% was almost halved.
scienceindustries was again in contact with affected parties and interested media regarding the disclosure and explained the transparency initiative of the pharmaceutical industry.

Inquiries and training on the Pharma Codes
In 2025, the Code Secretariat responded to over 541 written or telephone inquiries in accordance with section 8 PC / section 6 PCC (previous year: around 330). Of these, 524 related to the PC and 17 to the PCC. The introduction of Sharepoint led to some additional correspondence (79 inquiries). The renewed significant increase in inquiries is partly due to the area of support for further education and training events. These inquiries required a great deal of additional consultation work. In 2025, the Code Secretariat again conducted two online training courses on promotional activities for healthcare professionals with a total of 110 participants and two on pharma compliance with a total of 78 participants. In addition, scienceindustries, in its capacity as the self-regulatory body of the Swiss pharmaceutical industry, gave presentations on various topics and answered media inquiries.

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UK – PMCPA

Code authority activity
The PMCPA publishes an annual report each year when all the complaints received in that year are completed. The PMCPA also publishes detailed case reports on its website https://pmcpa.org.uk.