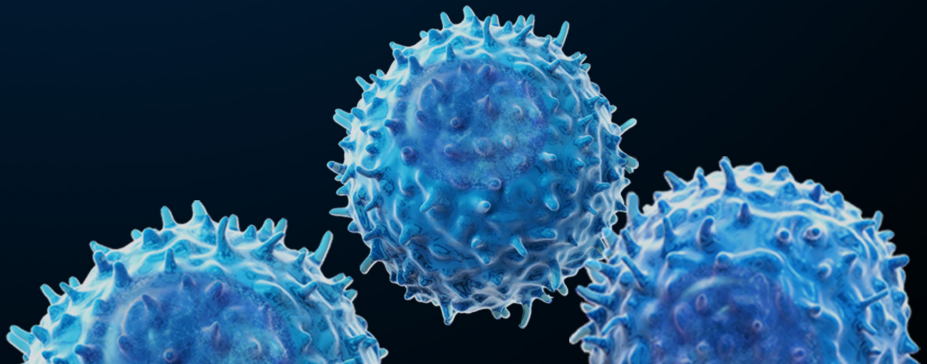


***REGENERON***

**Code on  
Global  
Interactions**

with Healthcare Professionals

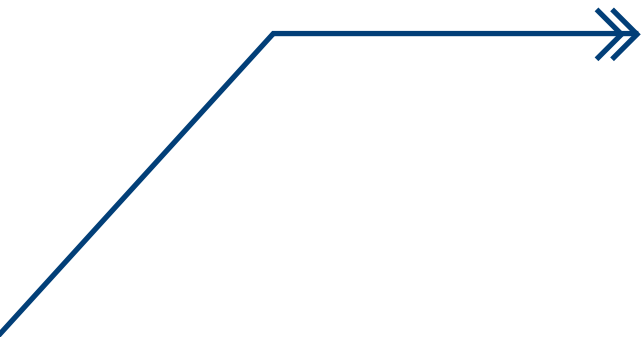




# Table of Contents

Introduction .....	5
Anti-Bribery Anti-Corruption .....	6
Guiding Principles.....	7
Promotional Activities .....	8
Healthcare Professionals Consultants And Consultant Meetings .....	8
Business Courtesies And Hospitality .....	9
Support For Third Party Medical And Scientific Meetings And Conferences.....	10
Research Grants.....	11
Educational Grants .....	12
Charitable Contributions.....	13
Medical Information .....	14
Compliance With Transparency Requirements .....	15
Definitions.....	16
Country Profiles Index .....	17





## Introduction

Regeneron Pharmaceuticals, Inc. (“Regeneron”) is dedicated to the advancement of medical science and the development of healthcare products that will improve patient care. We recognize that Healthcare Professionals are uniquely positioned to understand the needs of patients, the performance of medicines in the clinical setting and unmet treatment needs. Therefore, we are committed to collaborating with physicians and Healthcare Professionals in a manner that does not have, or appear to have, any undue influence on medical judgment, prescription, or product recommendations.

To ensure our commitment to the highest standards of ethics and integrity, Regeneron has adopted a Global Code on Interactions with Healthcare Professionals to govern Regeneron’s interactions – including marketing, sales, medical, and research and development activities – with Healthcare Professionals around the world. This document outlines the governing principles and basis of our interactions with Healthcare Professionals around the world.

Regeneron’s relationships with Healthcare Professionals and others, who administer, prescribe, purchase, or recommend regulated healthcare products shall comply with all applicable laws and regulations. Where local laws, regulations, industry codes of practice and policies set higher standards, they must take precedence over the Global Code.

This Code is consistent with all of Regeneron’s internal policies and procedures.

All payments must be adequately supported by documentation and accurately recorded in reasonable detail in Regeneron's books and records. Regeneron conducts appropriate Anti-Bribery Anti-Corruption due diligence on all third parties it engages and requires that all third parties acting on Regeneron's behalf conform to the highest ethical standards.

## Anti-Bribery Anti-Corruption

Regeneron's Anti-Bribery Anti-Corruption (ABAC) Policy prohibits corruption or bribery of individuals and entities, including foreign government officials, healthcare professionals, and commercial organizations. Regeneron does not tolerate any type of corruption, including bribery, facilitation or "grease" payments, or the offering of any improper payments or benefits, regardless of local customs or rationales for the payments or benefits. Regeneron personnel or third parties acting on Regeneron's behalf may never directly or indirectly give anything of value with the intention to improperly obtain or retain business or gain any business advantage, or to improperly influence the recipient's behavior. The policy applies to all employees of Regeneron, wherever they are located, and to third parties engaged in activities on behalf of Regeneron.

Interactions with government officials anywhere in the world must comply with applicable laws, rules, and regulations, including but not limited to the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act (UKBA). Any benefits provided to or on behalf of any government official and/or other third parties must comply with Regeneron's policies. In addition, any transactions with such entities or individuals must be reasonable, justified, and fully transparent.

Regeneron's books and records must accurately reflect all financial transactions and the use of the company's assets, which means that transactions and uses of assets are recorded in reasonable detail, and must be in accordance with the ABAC Policy.

**Please see Policy 918: Anti-Bribery Anti-Corruption for more information.**

## Guiding Principles

**Focus on the Patient:** Regeneron's primary goal is the well-being of the patients and consumers of our products. All of our interactions with Healthcare Professionals must advance that goal, and therefore are intended to improve healthcare and to benefit the patients who use our products.

**Maintaining the Integrity of the Relationship Between Physician and Patient:** The relationship between physician and patient is based on trust because of the unique role that physicians play in saving and enhancing human life. Therefore, it is critical that these relationships are not compromised by the collaboration between physicians and Regeneron in the development and testing of

new products, or the training and education of other physicians on the safe and effective use of those products.

**Transparency:** It is critical that all of Regeneron's interactions with Healthcare Professionals are conducted transparently and free of any actual or perceived conflicts of interest. To that end, Regeneron is committed to transparency and appropriate disclosure of policies regarding its relationships with Healthcare Professionals. Additionally, Regeneron's interactions with Healthcare Professionals who are employed by or affiliated with government or regulatory authorities will comply with all applicable laws, regulations, and industry codes of conduct or practice.



## Promotional Activities

Regeneron personnel engaging in product-related discussions with members of the healthcare community must ensure that their communications are for approved indications in the relevant country and are consistent with locally-approved product information. Materials used to promote Regeneron's products must be accurate, substantiated, fair, objective, verifiable, and consistent with applicable laws and regulations of the regions in which promotional activity occurs. All discussions with Healthcare Professionals must fairly balance information about a Regeneron product's benefits with information about its risks and limitations. Regeneron personnel will ensure that promotional activities are approved by its appropriate Legal, Medical, Regulatory, and Compliance Divisions, as appropriate, and personnel in those divisions must be consulted when compliance-related questions arise regarding promotional activities.

**Please see Policy 902: Communications with Members of the Healthcare Community for more information.**

## Healthcare Professionals Consultants And Consultant Meetings

Regeneron enters into fee-for-service arrangements with Healthcare Professionals as consultants to perform *bona fide* consulting services for which Regeneron has a legitimate business need. Such arrangements may include research, clinical trials, participation on advisory boards, and presentations at training programs. Regeneron will select Healthcare Professionals based upon their education, expertise, knowledge, experience within particular therapeutic areas, and their direct relationships to the purposes of the consulting arrangements. Consultant meetings must take place in a venue conducive to the effective exchange of information and must be designed to ensure active participation from all attendees.

Regeneron may not enter into consulting arrangements with Healthcare Professionals in order to influence or encourage recipients to prescribe, purchase, recommend or sell any Regeneron product, or to influence the outcome of clinical trials, or to reward Healthcare Professionals for any such past behavior. All consultant arrangements must have written and signed consultant agreements that specify the services to be performed and the compensation to be provided. Compensation for consulting services must be reasonable and reflect the fair market value of the services being provided and the time spent on services by the consultant. Regeneron's consulting relationships with Healthcare Professionals and others who administer, prescribe, purchase, or recommend regulated healthcare products shall comply with all applicable laws and regulations.



# Business Courtesies And Hospitality

Regeneron personnel may not offer or provide any gifts, entertainment, or recreational activities to Healthcare Professionals under any circumstances or in any locality. Regeneron personnel may not offer or provide educational items, business courtesy items or meals to Healthcare Professionals where such meals are prohibited by local laws or regulations. Neither may Regeneron personnel offer or provide

business courtesy items or meals in order to influence or encourage the recipients to prescribe, purchase, recommend or sell (or to arrange for the prescription, purchase, recommendation or sale of) any Regeneron product, or in order to reward Healthcare Professionals for any such past behavior. Business courtesy items and meals must be approved by Compliance prior to offering or giving to any HCP.

## Educational Items

To the extent they are allowed by local laws and regulations, educational items may be provided to Healthcare Professionals.

Educational items must be designed to educate patients or Healthcare Professionals, are not of significant value, and do not have value to the healthcare professional outside of a professional setting.

---

## Business Courtesy Items

If approved by Compliance, an inexpensive business courtesy item may be given on an occasional basis, if allowed by local law and industry practice, as part of customary interactions with a healthcare professional.

Business Courtesy items must be reasonable and customary in type and value of the host country where the recipient resides or does business, whichever is more modest.

---

## Business Courtesy Meals

Regeneron personnel may provide occasional business courtesy meals to Healthcare Professionals when the meals take place in a venue and in a manner conducive to conducting business matters or engaging in a scientific or educational exchange of information.

The cost of business courtesy meals shall be reasonable based upon standards in the relevant geographic area and consistent with applicable Regeneron policies. Finally, business courtesy meals may only be provided if they comply with all applicable laws, regulations, and industry codes of conduct or practice.

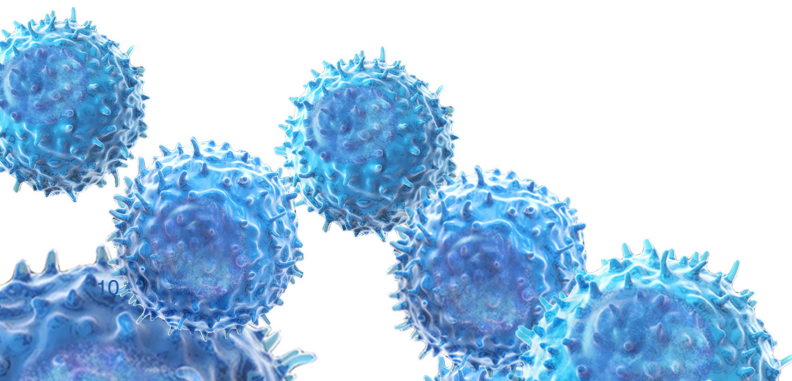
**Please see Policy 906: Meals and Educational Items, Policy 918: Anti-Bribery Anti-Corruption and Country Specific Profiles on the RON/Corporate Compliance ABAC Program page for more information.**

## Support For Third Party Medical And Scientific Meetings And Conferences

Regeneron may fund third party organizations to support medical and scientific conferences. The main purpose of Regeneron funded third party medical and scientific congresses, conferences, symposia and similar programs must be scientific exchange or medical education. Additionally, Regeneron funded third party conferences must be held in appropriate venues that are conducive to the main purpose of the meeting. Hospitality offered in connection with the third party meetings or conferences must be appropriate and will not include Regeneron support or organization of entertainment or leisure events. Regeneron will only provide such funding in a manner that is in

compliance with all applicable laws or regulations. Regeneron will not provide financial support to third parties as an inducement for a healthcare professional to use, prescribe, purchase or recommend a Regeneron product or to influence the outcome of a clinical trial.

Regeneron sponsorship of non-U.S. healthcare professional attendance at third party medical conferences or similar meetings, where permitted by local laws and regulations, is limited to support for travel, meals, accommodation and registration. In addition, Regeneron will not provide financial support for attendance by spouses or guests (unless qualified in their own right to attend).



## Research Grants

Regeneron supports research that advances medical and scientific knowledge about Regeneron's products and disease areas of interest, and will support research grants to scientists, Healthcare Professionals, research institutions, academic institutions and organizations for this purpose.

All research grant requests must be submitted, reviewed and funded according to company policies and processes. Research grant proposals must:

- be independently initiated
- be submitted in writing by the individual researcher or research entity seeking funding
- include supporting documentation and information.

Research grant proposals shall be evaluated by an appropriate review committee to ensure scientific merit and compliance with applicable laws and regulations. All entities requesting research grants must undergo an ABAC due diligence review prior to disbursement of grant funding.

Regeneron will never offer a research grant with the expectation or intention to influence an organization's programs or advocacy positions, or to receive recommendations or endorsements of products or any other promotional benefits. All research grants must comply with applicable guidance, laws and regulations. Under no circumstances will Regeneron condition research grant funding upon past, present or future prescriptions, purchase or recommendation of the use of a Regeneron product.





## Educational Grants

Regeneron provides non-promotional funding in the form of independent educational grants to third-party organizations, including research institutions, academic institutions and educational organizations, for the purpose of increasing scientific knowledge and health-related education.

All funding must comply with Regeneron's policies and procedures, applicable local laws and regulations, and industry guidance. All requests for educational grants must:

- come from independent medical or education institutions, educational providers, or health-related societies, user groups or private associations;
- be independently initiated through the Regeneron grant website by the entity conducting or organizing the educational program;
- include reasonable and appropriate levels of detail regarding estimated fees and expenses associated with the educational activities; and
- be approved by an applicable Regeneron review committee.

Regeneron will never offer or condition an educational grant based upon past, present or future prescription, purchase or recommendation of the use of a Regeneron product, or with the expectation or intention to influence an organization's programs or advocacy positions, or to receive any promotional benefits. All entities requesting educational grants must undergo the appropriate ABAC due diligence reviews prior to the approval of grant funding.

## Charitable Contributions

Regeneron is committed to contributing to the funding of non-profit organizations in order to support organizations and activities which have broad public benefit and which advance patient care. Charitable contributions are for philanthropic purposes only, and the decision to fund an organization or an event is only based upon the merits of the request and never as part of a “quid pro quo” to influence or to gain favor with formulary committee members, Healthcare Professionals, government officials, or any individual or organization.

Charitable organizations that will be considered for funding must be non-profit entities and may include patient advocacy groups, as well as research, medical, cultural and civic organizations. Charitable organizations requesting charitable

contributions must satisfactorily complete an ABAC due diligence review as part of the request evaluation process. Sales and marketing personnel cannot serve on the review committee, nor may sales and marketing personnel be involved in the submission of requests for charitable contributions. Requests for charitable contributions from qualified charitable organizations must be submitted in writing with all of the required supporting documentation and information. All charitable contributions shall comply with all applicable laws and regulations.



## Medical Information

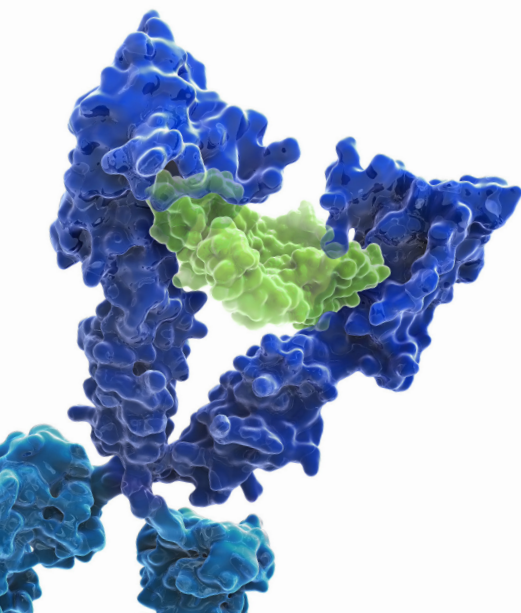
Medical Affairs may be contacted by Healthcare Professionals directly with questions about Regeneron products or research, including questions about unapproved uses. When responding, Medical Affairs must provide an objective, balanced, accurate, complete, appropriate and scientifically rigorous answer to the specific question asked, and should not provide any unnecessary elaboration. Additionally, all responses by Medical Affairs must be consistent with applicable legal and regulatory standards, and Regeneron's policies and procedures. Medical Affairs may only provide information regarding an unapproved product or an unapproved use of an approved product in response to an unsolicited request by a healthcare professional.

**Please see Policy 902: Communications with Members of the Healthcare Community for more information.**

## Compliance With Transparency Requirements

Regeneron's interactions with Healthcare Professionals can give rise to apparent or actual conflicts of interest. We support the disclosure of financial and other interests and relationships that may create apparent or perceived conflicts of interest in research, education or clinical practices. Regeneron will comply with all applicable transparency reporting requirements for payments and transfers of value to Healthcare Professionals.

Additionally, in our dealings with Healthcare Professionals employed by or affiliated with government or regulatory authorities, care will be taken to ensure that such dealings comply with all applicable laws, regulations, professional requirements or industry codes of conduct or practice.



# Definitions

## Business Courtesy Items

**“Business Courtesy Items”** are items of nominal value that may be provided on the occasion of an official visit or as part of an official holiday, custom, or tradition in a particular country. Examples of appropriate business courtesy items are tea, coffee, fruit, nut or small traditional pastries specific to that country or region.

---

## Facilitating Payments or Grease Payments

**“Facilitating Payments”** or **“Grease Payments”** are small payments of cash or Anything of Value to a Government Official for the purpose of expediting or securing the performance of a routine governmental action which may include:

- Obtaining permits, licenses, or other official documents to qualify a person or entity to do business in a foreign country;
- Processing governmental papers, such as visas and work orders;
- Providing police protection, mail pick-up and delivery, or scheduling Inspections;
- Providing phone service, power and water supply, loading cargo, or protecting goods from deterioration; or
- Actions of similar nature.

Facilitating payments do not include legitimate fees for expediting services, including situations where the expediting fee is clearly and publicly posted, available to the public, and the payment is not provided to someone in an individual capacity.

---

## Grants

**“Grants”** are financial support made to reputable institutions, organizations, and/or associations (both non-profit and for profit) in the health care arena for the purposes of supporting a targeted, identified project, study or other health care-related endeavor. Grants may be provided either in response to an unsolicited request or at Regeneron’s initiative.

---

## Healthcare Professional (HCP)

**“Healthcare Professional” (“HCP”)** means members of the medical, dental, pharmacy, and nursing professions and any other persons who, in the course of their professional activity, are qualified or permitted to prescribe, supply, administer, purchase, recommend, reimburse, pay for or acquire a medicine, or influence or authorize any of the foregoing. The term also includes health service managers and administrative or clinical support staff that provides support to HCPs, as well as any employees of any entity that is owned by or comprised of HCPs.

---

## Third Party

**“Third Party”** means any individual, company, association, partnership, collaborator or other entity retained to act on behalf of or for the benefit of Regeneron. The term includes, but is not limited to, non-employee agents, consultants, dealers, suppliers, distributors, etc.

# ***REGENERON***

Regeneron Pharmaceuticals, Inc.  
777 Old Saw Mill River Road  
Tarrytown, NY 10591  
<http://www.regeneron.com>

©2016, Regeneron Pharmaceuticals, Inc.  
All rights reserved  
2016 Version 1.0

