

**Medicines Australia**

**Independent Assurance**

**Practitioner's Report on Educational  
Events Reporting**

**27 March 2008**

# Contents

1	Executive summary	4
2	Overview of educational events	7
3	Findings – Data integrity testing exceptions	9
4	Findings – Review procedures testing exceptions	13
5	Statement of responsibility and engagement limitations	18
	Appendix A – Members and non-member companies	20
	Appendix B – Table of events template	21

This report has been prepared subject to the inherent limitations set out on page 18.

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# 1 Executive summary

## 1.1 Introduction

Deloitte Touche Tohmatsu (“Deloitte”) was engaged by Medicines Australia to perform a review of the information on educational events for healthcare professionals reported to them by companies<sup>1</sup>, for the six months ended 31 December 2007, in order to assist Medicines Australia assess the level of compliance with the Medicines Australia Code of Conduct (the “Code”).

## 1.2 Background

The Code (Edition 15) sets out standards of conduct for the activities of companies when engaged in the marketing of prescription products used under medical supervision as permitted by Australian legislation.

It is the role of members of the pharmaceutical industry to provide on-going, objective and scientifically valid interpretations of data on prescription medicines to healthcare professionals. The industry also has an obligation to provide appropriate non-promotional information on prescription medicines to members of the general public. The Code provides the standard for the provision of this information.

Adherence to the Code when conducting educational events for healthcare professionals and when sponsoring events organised by third parties is a requirement of membership of Medicines Australia.

The Monitoring Committee, Code Committee and Appeals Committee set up under clauses 11, 13 and 14 of Edition 15 of the Code have responsibility for the oversight of compliance with the Code.

Member companies are required to provide Medicines Australia with information relating to educational events they have either conducted or sponsored during the period in the format presented in Appendix B (the “Information”). Medicines Australia will make this information publicly available. This Information is supplied (via Medicines Australia) to the Monitoring Committee which will evaluate each company’s level of compliance with the aspects of the Code that are addressed by the Information provided.

## 1.3 Objective

The purpose of this report is to assist the Monitoring Committee, Code Committee and Appeals Committee of Medicines Australia in the evaluation of whether the Information reported by its members indicates compliance with certain components of the relevant sections of the Code. This report identifies testing exceptions in relation to the review procedures conducted in accordance with the agreed scope (section 1.4).

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<sup>1</sup> These companies are presented in Appendix A.

## 1.4 Scope

The scope of this project constituted applying review procedures to the Information reported by the members of Medicines Australia as provided to Deloitte in a spreadsheet by Medicines Australia for each company. These procedures were intended to identify potential incidences of non-compliance with the following provisions of the Code:

- Section 6.2 Hospitality
- Section 6.4 Sponsorship or involvement in Independently Organised Congresses
- Section 6.6 Venue Selection
- Section 7 Sponsorship (excluding subsections 7.1.2, 7.1.3 and 7.1.5)
- Section 10.1 Entertainment
- Section 10.2 Hospitality
- Section 10.3 Travel

## 1.5 Statement of responsibility and engagement limitations

This review has been conducted under ASAE 3000 “Assurance Engagement Other than Audits or Reviews of Historical Financial Information”, for the purpose of providing limited assurance to Medicines Australia. Further information in relation to the roles and responsibilities of Deloitte, Medicines Australia and the member companies and the limitations of this engagement are presented in Section 5.

Deloitte has not performed any testing to verify the completeness and accuracy of the data provided to us through Medicines Australia, and we express no opinion as to the completeness and accuracy of the data supplied to us.

## 1.6 Assurance - Practitioner's conclusion

Based on our review, which is not an audit, of the Information submitted through Medicines Australia, except for the testing exceptions listed in sections 3 and 4 of this report which should be further investigated by Medicines Australia, nothing has come to our attention to indicate that, in all material respects, the educational events for healthcare professionals held during the six months ended 31 December 2007 as reported to Medicines Australia by the companies, were not in compliance with the following sections of the Code:

- Section 6.2 Hospitality
- Section 6.4 Sponsorship or involvement in Independently Organised Congresses
- Section 6.6 Venue Selection
- Section 7 Sponsorship (excluding subsections 7.1.2, 7.1.3 and 7.1.5)
- Section 10.1 Entertainment
- Section 10.2 Hospitality
- Section 10.3 Travel

*Deloitte Touche Tohmatsu*

DELOITTE TOUCHE TOHMATSU

*Janet Lewell*

**Janet Lewell**

Partner

Melbourne, March 2008

# 2 Overview of educational events

Our analysis examined the data related to the educational events of 43 companies (42 member companies and one non-member company). These companies are listed in Appendix A.

The testing exceptions in relation to our analysis are presented in sections 3 and 4.

These 43 companies reported 14,633 educational events for the six months ended 31 December 2007. The majority of the educational events were held within Australia (98.49%). Of the 221 international events, 48 were sponsored (a ‘sponsored’ event is an event not initiated or organised by a pharmaceutical company) and 173 were organised by the companies. For the remaining 14,412 educational events held within Australia, 3,136 were sponsored and 11,276 were organised by the companies. This is further presented below.

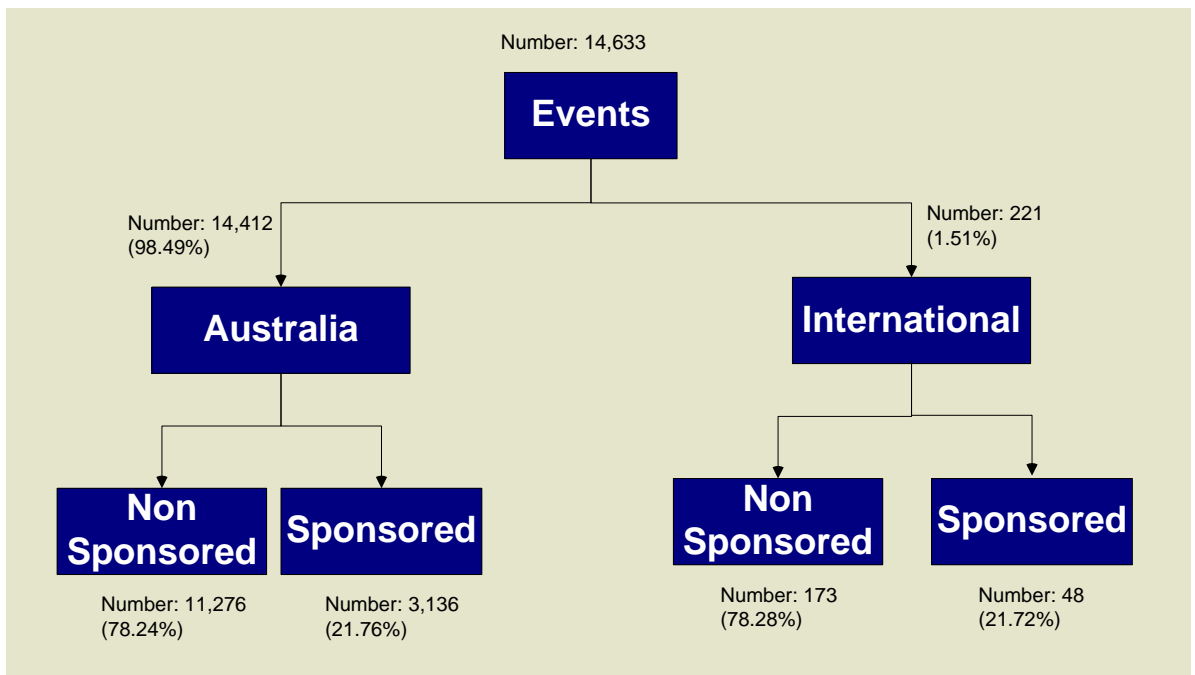


Figure 1: Classification of Educational Events

An analysis of the total number of attendees, educational hours, cost of hospitality and total cost of function for the 43 companies is presented below<sup>2</sup>.

Location	Event type	Total number of attendees	Total number of educational hours	Total cost of hospitality	Total cost of function
Australia	Non-Sponsored	222,506	14,580	\$13,645,710	\$21,542,340
	Sponsored	140,624	11,765	\$2,016,261	\$7,835,784
International	Non-Sponsored	3,923	1,622	\$602,718	\$721,326
	Sponsored	18,168	961	\$131,825	\$912,102
	<b>Total</b>	<b>385,221</b>	<b>28,928</b>	<b>\$16,396,514</b>	<b>\$31,011,552</b>

<sup>2</sup> The totals are based on the information provided to Deloitte by Medicines Australia on behalf of the companies and any missing data has been reported to Medicines Australia. Refer finding 3.2.

# 3 Findings – Data integrity testing exceptions

The testing exceptions identified based on the data integrity tests are presented below. These findings should be read in conjunction with the inherent limitations outlined in section 5.3.

The purpose of these tests was to determine the integrity and completeness of the data for analysis.

## 3.1.1 Data reconciliation

### 3.1.1.1 Testing procedure

Compare the summary information provided by Medicines Australia to the totals calculated using ACL<sup>3</sup> scripts for each of the companies on the following fields:

- Total number of educational events for each company
- Total cost of hospitality for each company spreadsheet
- Total number of attendees for each company
- The total cost of function for each company.

For any company totals that do not concur with those provided by Medicines Australia, we will discuss with Medicines Australia and agree a course of action.

### 3.1.1.2 Finding

Initially the control totals provided by Medicines Australia did not reconcile to the educational event data received. The key reasons were:

- Headings were included as part of the data set
- Educational hours were not provided in the ‘description of function’ column
- Data validation issues with regard to education duration
- Cost of hospitality and function fields had varying levels of detail, rather than a single reported amount.

Through discussions with Medicines Australia, it was decided by Medicines Australia that the control totals determined by Deloitte would be applied for the testing.

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<sup>3</sup> ACL (Audit Command Language) is a software tool used to analyse data.

### 3.1.2 Data validation – incomplete data fields

#### 3.1.2.1 Test procedure

Using ACL scripts, identify incomplete data fields including missing data related to:

- Description of function including duration of educational content delivered
- Venue
- Professional status of attendees
- Hospitality provided
- Total cost of hospitality (non-sponsorship)
- Number of attendees
- Total cost of function

Using ACL, identify any numeric fields with negative values and zero dollar values.

#### 3.1.2.2 Finding

Of the 14,633 reported educational events, we identified 3,613 testing exceptions. An analysis of these exceptions is presented below.

Nature of incompleteness		Number of companies	Number of data validation exceptions
Reason 1:	Data not provided – blank fields.	16	517
Reason 2:	Data unavailable - the required information was not contained within the field.	35	2,958
Reason 3:	Zero value – dollar value was zero.	14	138 (1)

Note (1): These exceptions may include events where there was no cost incurred in relation to the event.

For some events, there were several exceptions per event. The 3,613 testing exceptions were for 2,983 educational events, representing 20.39% of the total number of educational events. Medicines Australia decided to allocate a ‘nil’ value for parameters where the field was blank, unavailable or zero to perform the remaining reviewing procedures.

Further analysis of the 2,958 data validation exceptions for reason 2 is presented below.

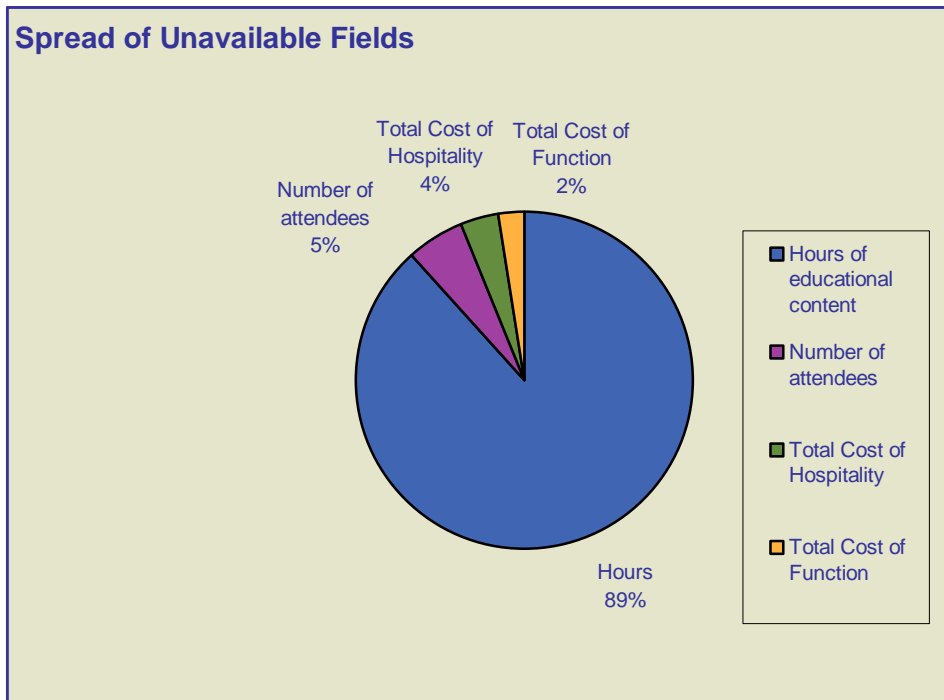


Figure 2: Analysis of the nature of data unavailability

The majority of the data unavailable (89%), related to hours of education that were not documented by the companies. It was decided by Medicines Australia that further consultation with the companies for additional information would be inefficient given the review timeframe.

### 3.1.3 Events with hospitality cost greater than function cost

#### 3.1.3.1 Testing procedure

Using ACL scripts, calculate the total cost of function less the total cost of hospitality per educational event for each company spreadsheet and filter for events less than zero.

#### 3.1.3.2 Finding

Of the 14,633 educational events for the 43 companies, we identified 36 exceptions related to eight companies (13 sponsorship and 23 non-sponsorship). The smallest variance between the hospitality and function cost was \$12.95 (non-sponsored), with the largest cost variance being \$13,179 (a sponsored event). The total cost of hospitality was greater than the total cost of function by \$44,934. By definition in the reporting requirements for educational events within the Code, the cost of hospitality cannot be greater than the cost of the function.

### 3.1.4 Total cost of function less total cost of hospitality above agreed threshold for non-sponsorship educational events

#### 3.1.4.1 Testing procedure

Using ACL scripts, identify where ‘total cost of function’ is significantly greater than the ‘total cost of hospitality’ beyond a threshold agreed by Medicines Australia for non-sponsorship educational events.

#### 3.1.4.2 Finding

Of the 11,449 educational non-sponsored events<sup>4</sup> for the 43 companies, we identified 239 educational events from 33 companies where the agreed threshold was exceeded.

### 3.1.5 Hospitality provided with ‘nil’ hospitality cost for non-sponsorship educational events

#### 3.1.5.1 Testing procedure

Using ACL scripts, identify \$0 cost for hospitality where hospitality is documented<sup>5</sup> in the ‘hospitality provided’ column for non-sponsorship educational events.

#### 3.1.5.2 Finding

Of the 11,449 non-sponsorship educational events for the 43 companies, we identified 26 educational events from 11 companies where hospitality was documented as being provided with no hospitality cost recorded. In addition, it was identified for 12 educational events that the function cost was also zero. The highest function cost with zero hospitality cost was \$10,440.

### 3.1.6 Hours of education and number of attendees not provided

#### 3.1.6.1 Testing procedure

Using ACL scripts, identify any educational events where the ‘hours’ and ‘number of attendees’ have not been provided.

#### 3.1.6.2 Finding

Of the 14,633 educational events for the 43 companies, we identified 43 educational events from 11 companies where both the educational hours and the number of attendees were not documented in the educational events listings<sup>6</sup>.

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<sup>4</sup> Note this could only be tested when the fields total cost of function and total cost of hospitality were provided by the member companies.

<sup>5</sup> Per the ‘Hospitality Provided’ column, refer Appendix B – Table of events template.

<sup>6</sup> Where these fields were not provided, test calculations could not be performed.

# 4 Findings – Review procedures testing exceptions

The testing exceptions identified based on the review procedures are presented below. These findings should be read in conjunction with the inherent limitations outlined in section 5.3.

The review procedures are divided into three categories:

- Financial
- Non-financial
- Multiple testing exceptions considering both financial and non-financial aspects.

The purpose of these tests was to evaluate whether the educational events reported by the companies comply with the relevant sections of the Code.

## 4.1 Financial testing exceptions

### 4.1.1 Educational events that exceeded agreed thresholds

#### 4.1.1.1 Testing procedure

Using ACL scripts, identify and report all educational events that exceed the Medicines Australia agreed threshold for the following calculated fields:

(a) Sponsorship:

- Function cost per attendee per hour

(b) Non-sponsorship:

- Function cost per attendee per hour
- Hospitality cost per attendee per hour
- Hospitality cost per attendee

#### 4.1.1.2 Finding

Deloitte analysed the data to identify relevant ratios to further stratify the data. The ratios and thresholds were then agreed with Medicines Australia. Of the 14,633 educational events for the 43 companies, we identified 1,161 testing exceptions spread across 749 (5.12%) educational events for 39 companies where the ratios exceeded the agreed thresholds. These exceptions could not consider the nature of the hospitality provided (eg single event with a single element of hospitality versus multiple day with multiple elements of hospitality events) due the nature of the data provided.

An analysis of this information is presented below.

Educational event type	Number of testing exceptions		
	Function cost per attendee per hour	Hospitality cost per attendee per hour	Hospitality cost per attendee
Australia – Non Sponsored	283	283	460
Australia – Sponsored	80	Not tested	Not tested
International – Non Sponsored	5	5	43
International – Sponsored	2	Not tested	Not tested

## 4.2 Non-financial testing exceptions

### 4.2.1 Identified testing exceptions of venue (sponsorship)

#### 4.2.1.1 Testing procedure

Using ACL scripts, identify and report educational events that are sponsorship for companies where the venue / event contain pre-determined words indicating potential non-compliance.

#### 4.2.1.2 Finding

Of the 3,184 sponsored educational events for the 43 companies we identified 134 (4.21%) sponsored educational events which were venue testing exceptions. These 134 testing exceptions were spread across 22 companies and were all held within Australia.

### 4.2.2 Identified testing exceptions of venue (non-sponsorship)

#### 4.2.2.1 Testing procedure

Using ACL scripts, identify and report educational events that are non-sponsorship for companies where the venue / event contain pre-determined words indicating potential non-compliance.

#### 4.2.2.2 Finding

Of the 11,449 non-sponsored educational events for the 43 companies, we identified 216 (1.89%) non-sponsored educational events which were venue testing exceptions. Identified educational events were spread across 27 companies, with 209 being held within Australia and seven held overseas.

## 4.2.3 Identified testing exceptions of hotel venue (non-sponsorship)

### 4.2.3.1 Testing procedure

Obtain a list of all 5 star venues from the NRMA and RACV ratings and amalgamate. Using ACL scripts, identify and report:

- Whether these venues have conference facilities using the venue's website.
- Educational events where the venue contains the name of the hotel.

### 4.2.3.2 Finding

Of the 11,449 non-sponsored educational events for the 43 companies, we identified 406 (3.53%) non-sponsored educational events which were testing exceptions for 5 star hotel venues with conference facilities. For the 406 educational events identified across 36 companies, 401 were held within Australia, with five educational events held overseas.

## 4.2.4 Identified testing exceptions of hotel venue (sponsorship)

### 4.2.4.1 Testing procedure

Obtain a list of all 5 star venues from the NRMA and RACV ratings and amalgamate. Using ACL scripts, identify and report:

- Whether these venues have conference facilities using the venue's website.
- Educational events where the venue contains the name of the hotel.

### 4.2.4.2 Finding

Of the 3,184 sponsored educational events for the 43 companies, we identified 183 (5.75%) sponsored educational events which were testing exceptions for 5 star hotel venues with conference facilities. For the 183 events identified across 30 companies, 178 were held within Australia, with five educational events held overseas.

## 4.2.5 Identified testing exceptions of restaurants (non-sponsorship)

### 4.2.5.1 Testing procedure

Obtain the 'top 100 restaurants nationally' and the 'top 10 by region in Australia' as listed by the Gourmet Traveller<sup>7</sup> and amalgamate the two lists.

Using ACL scripts, identify and report educational events where the venue contains the name of the restaurant for non-sponsorship events.

### 4.2.5.2 Finding

Of the 11,449 non-sponsored educational events, we identified 295 (2.58%) non-sponsored educational events across 35 companies, which were testing exceptions for the amalgamated list of restaurants.

<sup>7</sup> Source: [http://gourmettraveller.com.au/restaurant\\_top100.htm](http://gourmettraveller.com.au/restaurant_top100.htm) and [http://gourmettraveller.com.au/top\\_10\\_restaurants\\_by\\_region.htm](http://gourmettraveller.com.au/top_10_restaurants_by_region.htm) (on 30 January 2008).

## 4.2.6 Identified testing exceptions of restaurants (sponsorship)

### 4.2.6.1 Testing procedure

Obtain the ‘top 100 restaurants nationally’ and the ‘top 10 by region in Australia’ as listed by the Gourmet Traveller<sup>8</sup> and amalgamate the two lists.

Using ACL scripts, identify and report educational events where the venue contains the name of the restaurant for sponsored events.

### 4.2.6.2 Finding

Of the 3,184 sponsored educational events, we identified 63 (1.98%) sponsored educational events which were testing exceptions for the amalgamated list of restaurants, spread across 21 companies.

## 4.2.7 Identified testing exceptions of international travel

### 4.2.7.1 Testing procedure

Using ACL scripts, identify and report educational events that contain pre-determined words indicating potential non-compliance.

### 4.2.7.2 Finding

Of the 14,633 educational events for the 43 companies, we identified nine educational event testing exceptions spread across three companies. All of these events were held overseas.

## 4.3 Multiple testing exceptions

### 4.3.1 Identified multiple testing exceptions for educational events held within Australia (non-sponsorship)

#### 4.3.1.1 Testing procedure

Using ACL scripts obtain and report a listing of non-sponsored educational events in Australia that have testing exceptions in more than one category:

- Events exceeding agreed thresholds AND identified as a testing exception for the Venue / Entertainment tests

#### 4.3.1.2 Finding

Of the 11,449 non-sponsored educational events for the 43 companies, we identified 202 (1.76%) non-sponsored educational events spread across 36 companies, which had multiple testing exceptions for educational events held within Australia.

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<sup>8</sup> Source: [http://gourmettraveller.com.au/restaurant\\_top100.htm](http://gourmettraveller.com.au/restaurant_top100.htm) and [http://gourmettraveller.com.au/top\\_10\\_restaurants\\_by\\_region.htm](http://gourmettraveller.com.au/top_10_restaurants_by_region.htm) (on 30 January 2008).

## 4.3.2 Identified multiple testing exceptions for educational events held within Australia (sponsorship)

### 4.3.2.1 Testing procedure

Using ACL scripts obtain and report a listing of sponsored educational events in Australia that have testing exceptions in more than one category:

- Events exceeding agreed thresholds AND identified as a testing exception for the Venue / Entertainment tests

### 4.3.2.2 Finding

Of the 3,184 sponsored educational events for the 43 companies, we identified 16 (0.5%) sponsored educational events that were multiple testing exceptions. These exceptions were for educational events across nine companies which were held within Australia.

## 4.3.3 Identified multiple testing exceptions for educational events held overseas (non-sponsorship)

### 4.3.3.1 Testing procedure

Using ACL scripts obtain and report a listing of non-sponsored overseas educational events that have testing exceptions in more than one category:

- Events exceeding agreed thresholds AND identified as a testing exception for the Venue / Entertainment tests

### 4.3.3.2 Finding

Of the 11,449 non-sponsored educational events for the 43 companies, we identified four (0.03%) educational events that were multiple testing exceptions. These exceptions were for educational events across three companies which were held overseas.

# 5 Statement of responsibility and engagement limitations

## 5.1 Medicines Australia's responsibility

The companies are responsible for preparing reports to Medicines Australia in the format presented in Appendix B on the education events that they have conducted or sponsored on a six monthly basis. Medicines Australia is responsible for the collection and collation of reports on the educational events for healthcare professionals for the six month period ended 31 December 2007 and the provision of the collated reports to Deloitte for analysis.

This responsibility includes establishing and maintaining processes and internal controls relevant to the collection and collation of the reports from members to ensure that as far as possible they are free from material misstatement, whether due to fraud or error.

## 5.2 Assurance Practitioner's responsibility

Our responsibility is to express a conclusion on the educational events based on our review. We conducted our review in accordance with Australian Standard ASAE 3000, "Assurance Engagements Other than Audits or Reviews of Historical Financial Information," in order to state whether, on the basis of the procedures described, we have become aware of any matter that makes us believe that the educational events for healthcare professionals held during the six months ended 31 December 2007 were not in compliance with certain components of the following sections of the Code:

- Section 6.2 Hospitality
- Section 6.4 Sponsorship or involvement in Independently Organised Congresses
- Section 6.6 Venue Selection
- Section 7 Sponsorship (excluding subsections 7.1.2, 7.1.3 and 7.1.5)
- Section 10.1 Entertainment
- Section 10.2 Hospitality
- Section 10.3 Travel

Our engagement consisted primarily of applying review procedures to the educational events information reported by the members of Medicines Australia and provided to us in a summary spreadsheet by the management of Medicines Australia. A review is substantially less in scope than a reasonable assurance "audit" conducted in accordance with ASAE 3000, or an audit performed under Australian Auditing Standards. Accordingly, we do not express an *audit opinion*.

## 5.3 Inherent limitations

- 1) Because of the limitations inherent in the preparation of the data on which our review is based, it is possible that errors may occur and not be detected in relation to:
  - a) The completeness of the list of educational events reported to Medicines Australia
  - b) The accuracy of the information provided by the member companies.
- 2) Deloitte has performed no testing to verify the accuracy and completeness of the information provided to us through Medicines Australia.
- 3) The procedures were not designed to and are not likely to have revealed fraud or misrepresentation by Medicines Australia, or errors or omissions (deliberate or otherwise) in the event information provided by the member companies. Accordingly, we cannot accept responsibility for detecting fraud (whether by management or by external parties) or misrepresentation by any of the parties involved.

## 5.4 Limitations of use

This report is made solely to the management of Medicines Australia and the members of the Code Committee, Appeals Committee and the Monitoring Committee set up under Clauses 11, 13 and 14 of the Code of Conduct (Edition 15) in accordance with our engagement letter dated 3 March 2008, for the purpose of their governance and stewardship and should not be quoted in whole or in part without our prior written consent.

We disclaim any assumption of responsibility for any reliance on this report to which it relates to any person other than the management of Medicines Australia, or for any purpose other than that for which it was prepared.

We understand that a copy of this report will be placed on Medicines Australia's website. The responsibility for any electronic presentation of this report or extracts there from on Medicines Australia's website is that of the governing body of Medicines Australia, including the security of, and controls over, information on the website to maintain the integrity of the data presented.

We disclaim all liability to any other party for all costs, loss, damages, and liability that the other party might suffer or incur arising from or relating to or in any way connected with the contents of our report, the provision of our report to the other party, or the reliance on our report by the other party.

## 5.5 Independence, competence and experience

All professional personnel involved in this engagement have met the independence requirements of Australian professional ethical requirements. Our team has been drawn from our Risk Services practice and has the required competencies and experience for this engagement.

# Appendix A – Members and non-member companies

## Member companies

- Abbott Australasia Pty Ltd
- Actelion Pharmaceuticals Australia Pty Limited
- Alcon Laboratories (Australia) Pty Ltd
- Allergan Australia Pty Ltd
- Amgen Australia Pty Ltd
- AstraZeneca Pty Ltd
- Baxter Healthcare Pty Ltd
- Bayer Schering Pharma
- Biogen IDEC Australia Pty Ltd
- Bristol-Myers Squibb Australia Pty Ltd
- Boehringer Ingelheim Pty Limited
- Celgene Pty Ltd
- CSL Limited
- Eli Lilly Australia Pty Ltd
- Genzyme Australasia Pty Ltd
- Gilead Sciences Pty Ltd
- GlaxoSmithKline Australia Pty Ltd
- Innovex Pty Limited
- iNova Pharmaceuticals Pty Ltd
- Ipsen Pty Ltd
- Janssen-Cilag Pty Ltd
- Lundbeck Australia Pty Ltd
- Merck Serono Australia Pty Ltd
- Merck Sharp & Dohme (Australia) Pty Limited
- Mundipharma Pty Ltd
- Norgine Pty Limited
- Novartis Pharmaceuticals Australia Pty Ltd
- Novartis Vaccines Australia
- Novo Nordisk Pharmaceuticals Pty Ltd
- Nycomed Pty Ltd
- Organon (Australia) Pty Limited
- Pfizer Australia Pty Ltd
- Pharmion Pty Ltd
- Roche Products Pty Ltd
- Sanofi Pasteur Pty Ltd
- sanofi-aventis Australia Pty Ltd
- Schering-Plough Pty Ltd
- Servier Laboratories (Aust) Pty Ltd
- Smith & Nephew Pty Ltd
- Solvay Pharmaceuticals Pty Ltd
- UCB Pharma
- Wyeth Australia Pty Ltd

## Non-member company

- Alphapharm Pty Ltd

# Appendix B – Table of events template

The ‘Table of Events to be completed by pharmaceutical company as determined by the Australian Competition Tribunal’ (Source: Code of Conduct, Edition 15 Guidelines version 2) is presented below.

## Table of Events to be completed by pharmaceutical company as determined by the Australian Competition Tribunal

### Summary of Events sponsored by Member Companies: Reporting Period (July – December 2007)

Company Name:  
Number of events held:

Description of function including duration of educational content delivered	Venue	Professional status of attendees	Hospitality provided	Total cost of hospitality	Number of attendees	Total cost of function
<p>Companies to provide as much information as they feel necessary to explain the educational component</p> <p>For example, type of function, nature of education provided, length of education, CPD/CME points</p>	<p>Specify:</p> <ul style="list-style-type: none"> <li>• Venue name</li> <li>• Location</li> </ul>	<p>Specify:</p> <p>For example</p> <ul style="list-style-type: none"> <li>• Anaesthetists</li> <li>• General Practitioners</li> </ul>	<p>Specify the nature of the hospitality provided and whether it included any of the following elements:</p> <ul style="list-style-type: none"> <li>• Food and/or beverages</li> <li>• Accommodation</li> <li>• Travel</li> <li>• Entertainment</li> </ul>	<p>\$ cost</p> <p>This must state the total cost of the items listed in the hospitality column.</p> <p>A breakdown of those costs may be provided if desired.</p>	<p>XX</p>	<p>\$ cost</p> <p>Including</p> <ul style="list-style-type: none"> <li>• Speaker fees</li> <li>• Venue hire</li> <li>• Transportation costs</li> <li>• Materials specifically developed for and provided to attendees at the educational event etc</li> </ul>

