



# **GUIDANCE**

to

## **”Ethical Rules for Collaboration between Patient Organizations, etc., and the Pharmaceutical Industry” (Patient Organizations Code)**

The guidance on the Ethical Rules for Collaboration between Patient Organizations, etc., and the Pharmaceutical Industry (Patient Organizations Code) will continuously be updated as practices develop or change. The guidance is therefore dated and have a version number. All abbreviations used are explained at the back of the guidance.

*NB! You can search in the guidance by pressing "Ctrl + F" and entering your keyword*

### **Introductory comments**

At first the Patient Organizations Code was decided on by the Pharmaceutical Industry, but since EFPIA adopted their PO Code on 14<sup>th</sup> June 2011, the Patient Organizations Code has subsequently been adjusted to comply with the obligations of EFPIA's PO Code (now part of EFPIA Code of Practice).

The term "organization" will be used throughout this guidance, covering patient organizations and other organizations working for patient-related issues, health-related issues (e.g. the Danish Mental Health Fund), or other organizations promoting consumer interests (e.g. the Dane Age Association and the Danish Consumer Council).

Please note that the rules in this guide only apply to the pharmaceutical companies affiliated with ENLI's rules.

If you would like to see which companies have joined ENLI, an updated list can be found on the front page of [www.enli.dk](http://www.enli.dk).

At the end of this guide you will find a Q&A, where answers to questions that ENLI has received can be found.

## Re Article 1 Purpose

The purpose of the Patient Organizations Code is consistent with EFPIA's Code of Practice, Art. 21.01.

## Re Article 2 Scope of the ethical rules

*Re: Article 2, litra a)*

It is recommended to also read re: Article 2, litra c) and d).

In the introduction to EFPIA's Code of Practice, it is stated that the code covers collaborations between EFPIA members including their affiliates and contractual third parties (e.g. agencies) and patient organizations operating in Europe.

*Re: Article 2, litra b)*

### Definition of a Patient Organization

The Patient Organizations Code applies to cooperation with patient organizations, as defined in Article 1, section 7 of the Advertising Order, meaning organizations of patients and relatives, whose purpose is to protect the interests of patient groups, cf. Article 71 d of the Danish Medicines Act. The comments on Article 71d of the Danish Medicines Act state that the Article covers associations for patients with certain diseases, such as cancer or arthritis, as well as umbrella organizations for patient organizations. An example of an umbrella organization for patient associations is Danish Patients. If it is not a union of patients and relatives, it is not considered a patient organization.

In this connection, it should be noted that EFPIA, in their Code of Practice, defines patient organizations as *"not-for-profit legal person/entity (including the umbrella organizations to which it belongs), mainly composed of patients and/or caregivers, that represent and/or support the needs of patients and/or caregivers and which business address, place of incorporation or primary place of operation is in Europe."* According to ENLI, EFPIA's definition is similar to the definition used in the Patient Organizations Code.

In addition to patient organizations, the Patient Organizations Code also applies to collaborating with other organizations working for patient-related issues, health-related issues (e.g. the Danish Mental Health Fund) or other organizations promoting consumer interests (e.g. the Dane Age Association and the Danish Consumer Council) - collectively referred to as "organizations" in this guidance. For organizations working for consumer interests, the organization must, among other things, have a health policy focus.

	<b>Definition</b>	<b>Example</b>
<b>Patient organization</b>	<ul style="list-style-type: none"> <li>Organizations of patients and/or relatives whose purpose is to work for the interests of a particular group of patients</li> </ul>	<ul style="list-style-type: none"> <li>Multiple sclerosis Society</li> <li>Psoriasis association</li> <li>Danish Patients</li> </ul>
<b>Other organizations</b>	<ul style="list-style-type: none"> <li>Organizations working for <i>patient-related issues and/or health-related issues</i></li> <li>Organizations working for promoting <i>consumer interests</i></li> </ul>	<ul style="list-style-type: none"> <li>the Danish Mental Health Fund</li> <li>the Dane Age Association Forbrugerrådet</li> <li>the Danish Consumer Council</li> </ul>

ENLI does not find that collaboration with the organizations listed below is covered by the Patient Organizations Code, because these organizations are not; 1) organizations of patients and relatives or 2) organizations working for a specific disease, patient group or consumer interest with a health policy focus:

- Danish Hospital Clowns
- Youth Red Cross/Red Cross
- SMIL Fonden (Smile Foundation)

*Re: Article 2, litra c)*

### **Field of application**

- ENLI affiliated companies' collaboration with patient organizations:

	<b>Activity in Denmark</b>	<b>Activity outside Denmark, but within Europe</b>	<b>Activity outside Europe</b>
<b>Collaboration with a Danish patient organization</b>	The Patient Organizations Code	The Patient Organizations Code	The Patient Organizations Code
<b>Collaboration with a European patient organization</b>	The Patient Organizations Code	EFPIA Code and national regulations	National regulations and industry association regulations
<b>Collaboration with a non-European patient organization</b>	The Patient Organizations Code	EFPIA Code and national regulations	National regulations and industry association regulations

*Re: Article 2, litra d)*

Please refer to re Article 2, litra a) and c)

There is no guidance for this provision at present.

*Re: Article 2, litra e)*

There is no guidance for this provision at present.

### **Re Article 3 Support for patient associations' health services or research**

The provision implements EFPIA's Code of Practice Sec. 12.01 and 12.02.

### **Re Article 4 Contract terms and transparency**

*Re: Article 4, litra a)*

Cooperation agreements between pharmaceutical companies and organizations must be in writing, and number 1-8 must at the minimum be stated in the written agreement. The provision implements EFPIA's Code of Practice Sec. 21.03.

*Re Article 4, litra a), no. 3*

For further information, please refer to re Article 8, litra a) below.

In order to describe the type of project it must be stated whether these are specific meetings, pamphlets, information campaigns, education programs, travel, etc.

Due to the fact that it is an organization receiving support, the Patient Organization Code accepts that companies can provide support for the organization's board meetings and representative meetings, as these meetings are necessary for such organizations to function.

A membership of a patient organization is not considered a collaboration if the price reflects a genuine membership. If the price is higher than a real membership, the payment will be considered a sponsorship, and the rules for collaboration with a patient organization must therefore be respected. The name of the membership (e.g. business partnership, business quotas, etc.) is not the deciding factor. What matters is the price of membership and whether this should be seen as a collaboration or simply a regular membership.

*Re Article 4, litra a), no. 7 and 8*

Indication of the value of financial support:

- The factors that can be valued must state the actual value
- Other support must be clearly stated

In both cases, it must be stated what the support is used for.

For significant non-financial support that cannot be measured at meaningful financial value, such support is required to include a description that clearly explains the non-financial benefit received by the organization.

*Re Article 4, litra b) and litra c)*

This provision corresponds to EFPIA's Code of Practice Article 24.

Disclosure must be made from the conclusion of the agreement, meaning the date on which both parties have signed the agreement.

ENLI has previously stated that it is not a requirement that the agreement itself can be retrieved on the company's website. Thus, a summary can be made that contains at least the eight conditions outlined in this provision. It is also accepted to use the list that companies affiliated with ENL must submit to ENLI once a year, cf. Article 4, litra d).

It should be emphasized that patient organizations must publish all financial benefits at its website, including financial sponsorships (money sums) and payments in kind received by the organization from pharmaceutical companies, cf. article 21 of the Advertising Order. The publication on the website should show the amount of financial benefits from each company. The information must be available on the website no later than one month after the patient organization has received the financial benefit. The information must be available on the website for at least two years.

*Re Article 4, litra d)*

This provision obliges only those companies that are affiliated ENLI.

**Re Article 5 Contracted services**

This provision implements to EFPIA's Code of Practice Article 15.

*Re Article 5, litra a)*

There is no guidance for this provision at present.

*Re Article 5, litra b)*

There is no guidance for this provision at present.

*Re Article 5, litra b), no. 7*

If the consultancy comprises the involvement of patients who are members of the patient organization, payment may take place, directly from the pharmaceutical company to the patient, even if the contract is signed with the patient organization. It is recommended that this is specified in the contract.

*Re Article 5, litra b), no. 9*

The publication requirement corresponds to EFPIA's Code of Practice Article 24.

Companies are required to publish their agreements with the organizations within the scope of these rules. This obligation is fulfilled by publication on the company's websites, i.e. the website to which the company is linked.

If a company only has a global website, or only want a Nordic website, and not a national website, then the global respectively Nordic websites are to be considered the nearest website for the Danish company.

If the global or Nordic website is subdivided into countries, such as a sub-section for the Danish part of the company, the publication must be made on the sub-pages.

Therefore, you have to publish at the website that the company is linked to, and which represents the Danish company, which often will be a .dk domain, if any.

*Re Article 5, litra c)*

This provision implements to EFPIA's Code of Practice Article 15.04.

*Re Article 5, litra d)*

This provision implements to EFPIA's Code of Practice Article 10-11 and 13.01.

## **Re Article 6 Independence**

When a pharmaceutical company provides support to an organization, it is important that collaboration take place between independent parties.

*Re Article 6, litra a) and litra b)*

These provisions incorporate EFPIA's Code of Practice Sec. 21.01 and Sec. 13.03.

This means that pharmaceutical companies cannot influence the organizational material supported by the company in order to favor their own commercial interests.

However, a pharmaceutical company may, at the request of the organization, prepare text drafts when done in a reasonable and balanced scientific perspective. In addition, the company may correct incorrect facts.

*Re Article 6, litra c)*

This provision corresponds to EFPIA's Code of Practice Article 13.02.

The written agreement with the organization must clarify the specific purpose of the use of the logo, the name etc., and how the use will take place.

**Re Article 7 Prohibition of financial benefits and gifts**

This provision implements EFPIA's Code of Practice Article 11.

The provision must be interpreted in accordance with Art. 12 of the Promotion Code, according to which a gift ban applies, which in this context also includes occasional gifts, etc.

**Re Article 8 professional activities***Re Article 8, litra a)*

Please refer to re Article 4, litra a), no. 3 above.

Pharmaceutical companies can provide support for all the activities, projects and purposes for which the organization is working. This means that the pharmaceutical companies cannot provide general operating support to the organization but can only provide support in connection with specific projects and purposes for which the organization is working. ENLI finds that it is in accordance with the Patient Organizations Code to educate the organization within the given field of disease, for example through professional meetings or congresses, as long as the other rules of the Code are respected. Should the company itself host the meeting, the general rules for promoting to the public must be respected. This means, among other things, that no prescription medicine must be promoted.

A pharmaceutical company can also provide support in kind. This could be a presentation by the pharmaceutical company at one of the patient organization's events. However, the company must ensure



compliance with the rules regarding promotion of medicines to the public. Another form of support in kind could be to provide facilities. However, please be aware of the appearance of independence of the company and the organization, cf. re Article 6.

*Re Article 8, litra b)*

Currently there is no guidance for this provision.

*Re Article 8, litra c)*

The provision must be interpreted in accordance with Art. 13 (3) and (10) of the Promotion Code, regarding meeting venues.

*Re Article 8, litra d)*

This provision corresponds to EFPIA's Code of Practice Article 10.04 and 10.07.

The provision covers events organized by the organization or by the pharmaceutical company.

The provision must be interpreted in accordance with Art. 13 (7) of the Promotion Code.

*Re Article 8, litra e)*

To determine whether an event should be considered entertainment or professional depends on what the purpose of the event is. Is it information about the disease, or is it an entertainment event. It is necessary to assess why participants may wish to participate in the event.

It is ENLI's opinion that patient organizations work to raise awareness of a specific disease, this through awareness campaigns, which is why there is some leeway for activities that patient organizations want to carry out. However, what matters is the purpose of the activity; information or entertainment.

In addition, the provision is interpreted on the basis of the principle in section 13 (9) of the Promotion Code.

*Re Article 8, litra f)*

This provision implements EFPIA's Code of Practice Sec. 10.06.

Currently there is no guidance for this provision.

*Re Article 8, litra g)*

This provision implements EFPIA's Code of Practice Sec. 10.05.

The provision is interpreted on the basis of the principle in section 13 (7) and (8) of the Promotion Code.

*Re Article 8, litra h)*

This provision implements EFPIA's Code of Practice Sec. 13.01.

Currently there is no guidance for this provision.

*Re Article 8, litra i)*

This provision implements EFPIA's Code of Practice Sec. 10.02.

The provision is interpreted on the basis of the principle in section 13 (4) of the Promotion Code.

## **Re Article 9 Information on medicinal products and advertising**

This provision implements EFPIA's Code of Practice Sec. 21.02. and 21.04.

*Re Article 9 (2)*

Pharmaceutical companies cannot influence the organizational material supported by the company in order to favor their own commercial interests.

However, a pharmaceutical company may, at the request of the organization, prepare text drafts when done in a reasonable and balanced scientific perspective. In addition, the company may correct incorrect facts.

## **Re Article 10 Exclusive agreements**

This provision corresponds to EFPIA's Code of Practice Article 14.

Currently there is no guidance for this provision.

## **Re Article 11 Competence**

*Re Article 11, litra a)*

Currently there is no guidance for this provision.

*Re Article 11, litra b)*

Currently there is no guidance for this provision.

*Re Article 11, litra c)*

An example; there is no unethical conflict of interest between the parties if an organization operates completely outside the company's business area.

**Re Article 12 Enforcement**

Currently there is no guidance for this provision.

**Re article 13 Entry into force**

Currently there is no guidance for this provision.

## **Guidance on the annual reporting of collaborations with patient organizations to ENLI:**

In December, ENLI submits a reporting form, in a word document, where ENLI's affiliated companies must enter all collaborations with patient organizations, etc., for the current year.

It is important that only this specific word document is used and that columns are not deleted, added or changed in the format (e.g. PDF, Excel, etc.).

Please remember:

- No personal names or CPR numbers in the reporting form
- All amounts in DKK (not euros, etc.)
- It must be stated whether the amount is inclusive or exclusive VAT
- Inspiration for completing the reporting form can be found by looking at the published forms from previous years located on ENLI's website.

As ENLI use the same template for reporting, companies can advantageously fill out a reporting form throughout the year, so the work is easier at the end of the year when the report is to be submitted.

ENLI has a contact list of the employees of the affiliated companies who will receive the reporting form in December. Please inform ENLI if a new employee is to receive the annual reporting form.

## Q&A

### General:

According to the Patient Organizations Code, a pharmaceutical company may provide support for activities, projects and purposes for which the patient organization/organization is working.

This means that the pharmaceutical companies cannot provide general operating support to the organization to the organization but only provide support in connection with specific projects and purposes for which the organization is working.

### Scope of the ethical rules - Article 2

1. A pharmaceutical company has paid Asthma Allergy Denmark for costs associated with printing the "blue label" on products in the Nordic region. Does the Patient Organizations Code apply?

**ANSWER:** *No. ENLI finds that it is a purchase of a right - the purchase of the right to use the "blue label". Therefore, the Patient Organizations Code does not apply to this purchase.*

2. A pharmaceutical company buys an advertisement in The Danish Haemophilia Society's member magazine. Does the Patient Organizations Code apply to the purchase?

**ANSWER:** *No. The Patient Organizations Code does not apply to a company's purchase of an advertisement in a patient organizations magazine, provided the purchase is made under normal market conditions.*

*This means that price and exposure opportunities must be proportional - ie. that there should be a reasonable correlation between the price of the advertisement and the number of readers who receive the magazine.*

3. A pharmaceutical company has purchased a business partnership of a patient organization. The company gets its logo on the organization's website, and the company may use the patient organization's support-logo on the company's own website. Does the Patient Organizations Code apply?

**ANSWER:** *No. The Patient Organizations Code does not apply to the purchase. ENLI finds that it is a purchase of an advertising space, and thus it is a purchase and not a collaboration - "quid pro quo".*

4. A Danish pharmaceutical company has granted a Swedish patient organization DKK 100,000 for organizing an event for Nordic patient organizations (including Danish patient organizations). The event will be held in Sweden. Does the Danish Patient Organizations Code apply?

**ANSWER:** *The sponsorship is not covered by the Patient Organizations Code as the recipient is a Swedish patient organization and the event is held in Sweden. However, the sponsorship must comply with the EFPIA Code and Swedish law. Therefore, the event must be made public, and we recommend that Swedish Lif be contacted for further guidance.*

### Contract terms and transparency - Article 3, litra a), no. 3

#### Operation:

5. Is it possible for a pharmaceutical company to provide financial support to a patient organization for the preparation of postcards for general practitioners (illness awareness)?

**ANSWER:** *Yes. It is possible to provide operational support for a specific project aimed at raising awareness of the disease.*

6. Is it possible for a pharmaceutical company to provide financial support to a patient organization for publishing the organization's magazine?

**ANSWER:** *Yes. It is possible to provide operational support for a specific project that is in line with the purpose of the patient organization.*

7. Is it possible for a pharmaceutical company to provide financial support to a patient organization for paying a social worker and a psychologist to write an article on a disease to the patient organization's magazine for members?

**ANSWER:** *Yes. It is possible to provide operational support for a specific project that is in line with the purpose of the patient organization.*

8. Is it possible for a pharmaceutical company to provide financial support for the general operation of a patient organization - e.g. office furniture, salary for the patient organization's permanent secretary, office supplies, rent?

**ANSWER:** *No. It is not possible to provide support for the general operation of the patient organization. The pharmaceutical company can only support in connection with specific activities, projects and purposes for which the patient organization works.*

### Contracted services - Article 5

9. A pharmaceutical company has arranged an Advisory Board with participation of a patient organization where the company pays a fee to the invited participants. Is this collaboration regulated by the Patient Organizations Code?

**ANSWER:** *Yes, cf. Section 5 (b) of the Patient Organizations Code.*

### Representative from a patient organization as speaker

10. A pharmaceutical company wants a representative from a patient organization to talk about a disease and the work of the patient organization at the company's continuing education arrangement. Is it possible for the company to contact the patient organization, who then selects a member of the patient organization who will speak as a representative for the patient organization?

**ANSWER:** *Yes.*

11. If the pharmaceutical company previously has used a representative from a patient organization as a speaker, is the company allowed to contact this speaker directly or should the contact always go through the patient organization?

**ANSWER:** *The contact must always go through the patient organization.*

12. Is it a requirement that the pharmaceutical company send their inquiry to the chairman of the patient organization?

**ANSWER:** *It depends on the procedure in the individual patient organization – does the organization have a general mailbox to write to or a specific contact person? If not, ENLI recommends contacting the chairman.*

13. Does ENLI have a guide for fair market value to speakers?

**ANSWER:** *No. ENLI has no rules for fair market payment of speaker-fees, but consistency between the fee and the service provided must be present.*

14. Is it a requirement that the pharmaceutical company sign a contract with the patient organization (and pay the fee to the patient organization) or should the company instead contract directly with the selected speaker (after the patient organization has approved the task and the speaker)?

**ANSWER:** *It depends on the patient organization's internal rules, including whether the fee belongs to the patient organization or the selected speaker.*

15. Is it a requirement that the company is paying the speaker-fee to the patient organization or directly to the selected speaker?

**ANSWER:** *See the answer above.*

16. If a pharmaceutical company has used a representative from a patient organization as a consultant (for example for a meeting) must the company publish the consultancy activity (and fee) on the company's website?

**ANSWER:** *Yes, cf. Article 5 of the Patient Organizations Code.*

17. Is it possible for a pharmaceutical company to hire a representative from a patient organization as a speaker to a meeting held abroad (pay for transport, accommodation, etc.)?

**ANSWER:** *Yes, if there is a logistical justification for the meeting being held abroad, and the specific presentation of the patient organization is considered relevant for the participants.*

18. What can a representative from a patient organization (who may also be a patient) actually talk about - can they only talk about the disease in general or may they also talk about their own experience with the disease?

**ANSWER:** *The person representing a patient organization may only talk about the disease in general terms, which means that personal medical stories are not allowed.*

*Please note that if a representative attend some of the other lectures at the meeting, no prescription medicine must be mentioned as the representative is not considered a healthcare professional (unless he or she is an actual healthcare professional).*

### **Professional activities - Article 8, litra a)**

- 19.** Is it possible for a pharmaceutical company to provide financial support to a patient organization for lending view books to doctors, so that the organization do not need to charge rent from the healthcare professionals. The purpose of the view books is to provide the doctor's patients with information about the disease area, which the patient organization works within.

**ANSWER:** *Yes, this financial support is regulated by the Patient Organizations Code.*

- 20.** Is it possible for a company to invite the board of a patient organization to visit the company, so the board can learn more about the company and how it works? No medicines are mentioned during the visit.

**ANSWER:** *Yes, provided there is no mentioning of medicines at any time, it is possible for a company to invite for such an informational meeting.*

*The mention of prescription medicines will be considered promoting of prescription medicines to the public.*

### **Entertainment – Article 8, litra e)**

- 21.** Is it possible for a pharmaceutical company to provide financial support for a patient organization's hosting of a chief ball tournament where the organization will inform and test for a given disease?

**ANSWER:** *Yes. However, what matters is the purpose of the activity; information or entertainment. The pharmaceutical company can only provide financial support if the purpose is information.*

- 22.** Is it possible for a pharmaceutical company to provide financial support to a patient organization, who on Facebook wants to raise awareness of the patient organization's new website?

**ANSWER:** *See the answer above.*

- 23.** Is it possible for a pharmaceutical company to provide financial support to a patient organization for a photo exhibition - disease awareness campaign?

**ANSWER:** *The answer depends on the content of the photo exhibition.*

*If the photo exhibition shows photos of the disease or otherwise provides information relevant to the patient organization, it will be allowed for the pharmaceutical company to provide support to the patient organization in connection with the organization's photo exhibition.*



*If the photo exhibition shows photos that are not relevant to the patient organization, e.g. photos of landscapes and animals, and thus does not provide knowledge about the disease in question, the pharmaceutical company cannot provide support for the photo exhibition.*

- 24.** Is it possible for a pharmaceutical company to provide financial support for a patient organization to host an anniversary and theme event?

**ANSWER:** *If the event is only for the patient organization's employees, the company cannot provide financial support, as the support then will not cover cost of an activity, project or purpose for which the organization is working, cf. Article 8, litra a).*

*If the event is for anyone other than the patient organization staff, the company's ability for support will depend on the content of the event - i.e. is information about the disease included, etc. or it is just entertainment.*

- 25.** Is it possible for a pharmaceutical company to provide financial support for a patient organization's hosting of a summer camp (for children, adolescents and their parents)?

**ANSWER:** *Generally, this will not be possible, as the support is not given for an activity, project or purpose for which the organization is working, cf. Article 8 (a). However, it depends on the content and purpose of the summer camp.*

- 26.** A pharmaceutical company has purchased an exhibition stand by a patient organization in connection with the organization's educational event for healthcare professionals. Is this purchase regulated by the Patient Organizations Code?

**ANSWER:** *No, an actual purchase of an exhibition stand is not considered a financial support or collaboration with the organization (and therefore not covered by the Patient Organizations Code). The purchase is instead regulated by the rules of the Promoting Code (Article 18 of the Promoting Code).*

- 27.** A pharmaceutical company wants to purchase a seat on a bicycle team that is being offered by a patient organization in connection with a campaign. The company wants to give the seats on the team to their own employees. Is this purchase regulated by the Patient Organizations Code?

**ANSWER:** *No. The Patient Organizations Code does not apply to the purchase. ENLI finds that it is an actual purchase, and thus it is a purchase and not a collaboration – "quid pro quo".*

- 28.** A pharmaceutical company wants to invite a patient organization to a lecture as well as a tour of their factory, where participants can see the process of manufacturing medicines. Is it possible for the company to invite to such an event?

**ANSWER:** *A pharmaceutical company is only allowed to give a presentation on disease and health when the participants are not healthcare professionals. ENLI will not recommend a guided tour of the company's factory, as the event may include promoting of medicines. Promotion to the public of prescription medicine is not allowed, cf. Section 66(1), no. 1, of the Danish Medicines Act.*

29. A patient organization wants to host a music concert where the profits from ticket sales go uncut to research in the field of disease for which the patient organization works. Is it possible for the pharmaceutical company to provide support for the concert?

**ANSWER:** *No. In connection with events, the company is not allowed to sponsor or organize any type of entertainment activities, cf. Article 8, litra e) of the Patient Organizations Code.*

### **Catering and representation – Article 8, litra f)**

30. Is it possible for a pharmaceutical company to provide financial support for the patient organization's transport and accommodation at the Peoples Political Festival on Bornholm (awareness campaign)?

**ANSWER:** *Yes. Keep in mind that catering and representation must be at a reasonable level and must be strictly limited to the purpose of the event. The price-cap for catering must be observed. For further information, please refer to the guidance to the Promotion Code regarding representation and catering.*

31. A network meeting is planned, where European and global patient organizations discuss and share strategies and will increase knowledge of the field of disease. Is it allowed for the pharmaceutical company to pay the costs associated with the meeting (catering and rent of venue)?

**ANSWER:** *Yes, a pharmaceutical company can cover a patient organizations' expenses for catering and rent of venue in conjunction with a network meeting, where patient organizations discuss and share strategies to increase knowledge of the field of disease.*

32. A Danish pharmaceutical company has given a Danish patient organization DKK 100,000 for organizing an event to inform and provide knowledge about a disease. Unfortunately, the event was canceled due to lack of participants. Is it allowed for the patient organization to set off the documented expenses that the patient organization has already paid in planning the event, before returning the remaining amount to the pharmaceutical company?

**ANSWER:** *Yes, but the amount the patient organization receives from the company must be made public even though it may be a small amount and the event is cancelled.*

**Abbreviations**

EFPIA	The European Federation of Pharmaceutical Industries and Associations
ENLI	Ethical Committee for the Pharmaceutical Industry in Denmark
Lif	The Danish Association of the Pharmaceutical Industry
Patient Organizations Code (Patientforeningskodekset)	Ethical Rules for Collaboration between Patient Organizations, etc., and the Pharmaceutical Industry
Advertising Order	Order on Advertising, etc., of Medicinal Products (Bekendtgørelse nr. 1153 af 22/10/2014 om reklame mv. for lægemidler)
The Promotion Code (Reklamekodekset)	The Pharmaceutical Industry's Code of Practice on Promotion etc., of Medicinal Products aimed at Healthcare Professionals