

Code of Conduct

INTRODUCTION

This Code of Conduct applies to all activities undertaken by the Blood Transfusion Association (hereinafter, the Association), its Members, Participants and the organisations they represent for the objectives of the Association.

This Code of Conduct is fundamental to the values of the Blood Transfusion Association, and essential to achieving the Association's mission of promoting the correct use and safe supply of blood and blood components for transfusion. This goal is pursued without any profitable objective for either the Association, its Members and Participants.

This document covers the working relationship of the Association, both between the Members and Participants, as well as in its interaction with institutional and non-institutional stakeholders, including healthcare professionals, healthcare organisations as well as patients, patient organisations and public officials. The ethical standards set out in the present Code of Conduct are critical to making the united voice of the sector heard.

I. CORE VALUES OF THE ASSOCIATION

All Members and Participants will always act according to the Association's core values:

1. **Safety:** It promotes safe blood use and supply, including but not limited to blood collection, separation, processing and storage.
2. **Commitment:** It is patient- and donor-centred and professional in its conduct.
3. **Innovation:** Its conduct is innovative and culturally sensitive.
4. **Respect:** It respects its Members and Participants as well as blood donors, patients, healthcare professionals and providers that it serves.
5. **Integrity:** The Association, its Members and Participants' conduct is credible, transparent, and is clear and in line with the Association's mission and objectives and committed to the four established healthcare compliance principles, namely separation, transparency, documentation and equivalence.
 - 5.1. **Separation** – Interactions between the Association, its Members, or Participants, and healthcare professionals cannot be misused to influence, through undue or improper advantages, purchasing decisions, nor should such interactions be contingent upon sale transactions or use or recommendation of products. The Association, its Members, or Participants should avoid even the perception of the improper influence on healthcare professionals. In particular,
 - The Association, its Members, or Participants shall not organize events which include social, sporting and/or leisure activities or other forms of entertainment, nor support such elements where these elements are part of events organized by third parties.

- The Association, its Members, or Participants exceptionally may provide inexpensive educational items and/or gifts, in accordance with national laws, regulations and industry and professional codes of conduct. But these educational items and/or gifts must relate to the healthcare professional's practice, or benefit patients, or serve a genuine educational function.
- 5.2. Transparency** – Interactions between the Association, its Members or Participants, and healthcare professionals must be transparent and comply with national and local laws, regulations or professional codes of conduct. The Association, the Members and the Participants acknowledge that they may be required by applicable laws or regulations and industry codes of conduct to disclose publicly on an individual or aggregate basis details of payments made to healthcare professionals, organisations in the healthcare sector, or patient associations.
- 5.3. Documentation** – In case of interactions between the Association, its Members, or Participants, and healthcare professionals or healthcare organisations, there must be an appropriate written documentation of all relevant aspects of the interaction. Where services are performed by a healthcare professional or healthcare organisation for the association, this means that there must be a written agreement, setting out a legitimate purpose of the interaction, the services to be performed, the method for calculation of a fair market value remuneration and reimbursement of expenses as well as the remuneration to be paid by the Association.
- 5.4. Equivalence** – When healthcare professionals are engaged by the Association to perform a service for or on behalf of the Association, the remuneration paid by the Association must be commensurate with, and represent a fair market value for, the services performed by the healthcare professional. The remuneration may be subject to the transparency obligations as described under Article 5.2.

II. RESPONSIBILITIES

The Blood Transfusion Association recognises that the manner in which the Association, its Members and Participants conduct business reflects upon the professionalism of the blood industry. Therefore, the Association, its Members and Participants, the members of the Association's Board of Directors and Secretariat shall abide by the present Code of Conduct and:

- Comply with all applicable laws and regulations, including without limitation laws on antibribery and anti-corruption, on antitrust and competition, anti-money laundering and anti-fraud and other laws against financial crime as well as laws and regulations on data protection, and promptly report any actual or suspected violations of such laws and regulations committed in connection with work for the Association;
- Serve the Association in line with its core values;
- Act with integrity, competence, diligence and respect, and in an ethical manner with other Members, Participants of the Association and other stakeholders;
- Promote cooperation within the sector or sectors in which they work; In doing this, the Association, its Members and Participants shall seek to identify and apply good practice;
- Endeavour to represent the common interests of the Association, the Members of the Association, to achieving the Association's mission of promoting the correct use and safe supply of blood and blood components for transfusion;

- Endeavour to maintain and improve the quality of the Association work through constant review of the Association's aims, activities and outcomes;
- Avoid any conflicts of interest.

The Association, the Members and Participants of the Association, when carrying out the activities on behalf of the Association, shall:

- Uphold the highest levels of professionalism, working collectively in a constructive manner;
- Declare the interest of the Association they represent, identifying their name and organisation during all professional interactions;
- Consult other Members or Participants of the Association whenever and wherever its name is used, particularly in external communications;
- Conduct all enquiries to public figures in a transparent and honest way, in line with the objectives of the Association and the decisions of Members;
- Ensure a constructive working relationship with all elected and public officials through clear representation and a respectful approach to all work;
- Not disseminate false or misleading information knowingly or recklessly and shall exercise proper care to avoid doing so inadvertently;
- Honour confidentiality of information given to them.

All signatories agree that they and all individuals acting on behalf of their companies will adhere to this Code and will avoid actions likely to bring discredit upon the profession or the Association itself.

The Secretariat of the Association will at all times abide by the European Public Affairs Consultancies' Association (EPACA) Code of Conduct in relation to any activity carried out on behalf of the Association.

III. FAIR COMPETITION

The Members and Participants shall not make any agreements or concerted practices concerning coordination of conduct that restrict or affect competition. In order to avoid such conduct, cooperation between the Members and Participants shall be restricted to the defined goals and purposes of the Association.

To the extent that Members and/or Participants of the Association are competitors, they shall not use the forum provided by the Association in order to coordinate their commercial activities. A Member or Participant must exercise its independent business judgment in pricing its products and services, dealing with its customers and suppliers, and choosing the markets in which it will compete.

In this respect, strategic, secret, individual, recent, current or future information may not be exchanged among the Members or Participants.

Discussions or exchange of information between the Members or Participants of the Association that might constitute or imply an agreement or concerted practice on the following topics is strictly forbidden where Members and/or Participants are competitors. This means that, discussions relating to the following topics are prohibited, whereby the list is non-exhaustive:

- prices or price factors, including discounts, rebates, and reductions;
- costs and demand structure;
- profits and profit margins;

- production capacities
- output and sales;
- market shares and sales territories;
- investments and marketing plans;
- bidding or refraining from bidding;
- credit conditions or any other terms or conditions of sale or purchase;
- selection, rejection, or termination of customers or suppliers and other business partners.

The Members and Participants will make sure that all relevant competition laws are respected in their dealings with each other.

As part of the day-to-day management of the Association, any meeting invitations of the Association shall be accompanied by an agenda with the topics to be discussed prior to such meeting. During the meeting, all Members and Participants shall stick to the topics included in the agenda during the meetings and avoid any inappropriate topics, for example never exchange information on market share, prices, price elements or influence the price setting by distributors (e.g. minimum resale-prices) and never collude on tenders or allocations of markets, territories or customers.

Minutes of each meeting are drawn up by the Secretariat or, in his/her absence, by the person appointed by the President, and sent to Members by email following the meeting. The minutes are kept at the registered office of the Association, where all Members can consult it. Minutes are approved at the following meeting and signed by the President.

IV. CONFIDENTIALITY

The Members and Participants commit to maintain confidentiality if they receive confidential information in connection with their membership or participation in the Association.

V. NON-COMPLIANCE

The Secretariat will be present at all gatherings of the Association to make sure there are no breaches of the present Code of Conduct.

Members and Participants may be excluded by decision of the General Assembly in case of breach of the present Code of Conduct.

The signatories to this code are all committed to abide by it, acting in an honest, responsible and courteous manner at all times and seeking to apply the highest professional standards. Each Member and Participant not only agrees to abide by the principles and practices set forth in this document, but also acknowledges that a violation of any of the provisions constitutes grounds for exclusion from the Association.

We understand, respect and abide by this Code issued by the Blood Transfusion Association.

Signed by: Signature

Date: