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29 July 2014

Dr Richard Chadwick
General Manager, Adjudication Branch
Australian Competition & Consumer Commission
GPO Box 3131
Canberra ACT 2601

Dear Dr Chadwick

Submission in support of A91436-A91440 – Medicines Australia Limited reauthorisation application

GSK welcomes the opportunity to provide a submission in support of Medicines Australia's application for reauthorisation of the Code of Conduct. The 18th edition of the Medicines Australia Code of Conduct (MA Code) is an important achievement in industry self-regulation that will markedly increase transparency of interactions between MA member companies and healthcare professionals (HCPs).

Over many years, and particularly since 2007, each new edition of the MA Code has provided continuous improvements in transparency and ethical expectations of member companies' interactions with HCPs. The 18th edition of the MA Code builds on previous editions to ensure the Code continues to deliver meaningful benefits to the public.

GSK fully supports, and welcomes, the significant amendments to the 18th edition of the MA Code including a requirement that member companies publish three transparency reports, one of which will disclose certain transfers of value made to individual healthcare professionals. Another important change in the MA Code is the establishment of a specific limit on the value of hospitality to HCPs.

The changes in the 18th edition strike the right balance in terms of delivering greater transparency of individual HCP interactions while taking into consideration:

- the autonomy of HCPs;
- the relevant privacy legislation;
- the importance of offering all HCPs educational opportunities to strengthen their knowledge of the products they prescribe; and
- the unintended consequences of more resource-intensive transparency models.

GSK believes greater transparency delivered through the revised Code will build public understanding of the value and importance of interactions between the companies that research, develop, make and market medicines and the HCPs that prescribe those medicines for the treatment of their patients. Indeed, innovative pharmaceutical industry transparency initiatives like those encompassed in the revised Code impact a range of stakeholders. GSK gained useful insights from engagement with sector stakeholders during Medicines Australia's consultation process for the revised Code, and we are pleased that a number of prominent industry groups and allied HCP groups support the industry's move toward greater transparency.

The latest changes to the MA Code demonstrate our industry's willingness to challenge the status quo and create innovative solutions to increase transparency in a pragmatic, but meaningful way together with our sector stakeholders. This is in line with GSK's core values: transparency, respect for people, patient-focus and integrity.

GSK is strong advocate for greater transparency in the pharmaceutical industry. Since 2010, GSK has voluntarily disclosed aggregate payments made to HCPs, consumer organisations and not for profit organisations.

In 2013, we announced our intentions to take this one step further by phasing out payments to HCPs for speaking engagements and for attendance at medical conferences. We have also announced we will be shifting our compensation programme to remove individual sales targets for GSK sales employees who work directly with prescribing HCPs. These are industry-leading initiatives that compliment the ongoing work of the broader industry to increase transparency and build trust with the community.

In summary, GSK supports MA's application for reauthorisation of the 18th edition of the Code of Conduct.

Thank you again for the opportunity to comment.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Geoff McDonald', written over a faint, light-colored signature line.

Geoff McDonald
VP & General Manager
GlaxoSmithKline Australia