



MICROMEDEX®, A PRODUCT OF MERATIVE

Conflict of Interest Policy

Micromedex Editorial Department

Executive Summary

This document sets forth policies and procedures to help ensure that individuals involved in literature evaluation and content development for Micromedex® databases and products are free from financial conflicts of interest. The Micromedex® Editorial Department ("Editorial Department") is committed to providing unbiased evidence-based information on drug uses in accordance with the available medical and scientific literature. The policies and procedures outlined herein identify and help manage potential conflicts of interest for Micromedex Editorial Department employees ("Employees") and external advisors ("Advisors") involved in the content development process for Micromedex® (together, Employees and Advisors are referred to herein as "Workers").

Background

The Editorial Department draws on the expertise of a range of individuals from within and outside the company to review and evaluate the available evidence on a drug. It is essential that these individuals be impartial and unbiased.

Workers may have affiliations with the drug sponsor or a competing drug sponsor or may have a direct commercial interest in the drug. For example, a leading researcher in a particular field may act as a clinical trial investigator or as a consultant for the sponsor of a drug covered by a Micromedex® database or may have intellectual property and royalty rights in the drug. Where such financial relationships exist, there is the potential for a conflict of interest. The drug information contained in Micromedex products may be used by physicians to facilitate prescribing determinations, or by third-party payers or government healthcare programs to facilitate coverage or reimbursement determinations. The content that Micromedex develops thus has a potential commercial impact on drug sponsors and consequently on individuals with financial ties to the sponsors or a competing drug sponsor.

Not all financial relationships are disqualifying. Financial relationships vary in type and size, and an overly broad conflict of interest policy would inappropriately preclude individuals with critical expertise from contributing to content development. This document, therefore, sets forth a process to identify and categorize relevant financial relationships. Specific criteria are then applied for each category to determine whether disqualification or disclosure is necessary. For the remainder of this policy, a drug sponsor or competing drug sponsor will be referred to as a "Pharmaceutical Company," meaning a company that sells and markets a pharmaceutical product.

I. Collecting Information on Financial Relationships

External Advisors

Before utilizing any Advisor, the Editorial Department will collect information on the Advisor's financial relationships with Pharmaceutical Companies. Information will be collected on a Financial Disclosure Form ("FDF"), a copy of which is attached hereto.

The Editorial Department is responsible for ensuring that the FDFs are completed and maintained by the Editorial Department. FDFs will be completed upon the beginning of an Advisor's term on an advisory board or other engagement by the Editorial Department, and annually thereafter.

In addition, in the case of an Advisor working on Off Label content, the Editorial Department will request the Advisor to update any financial disclosure information by completing a new FDF prior to the Advisor's work on any new assignment such as review of a particular monograph.

If an Advisor or potential Advisor refuses to provide information about his or her financial and other relevant interests, such individual shall be disqualified from serving as an Advisor and participating in content development for Micromedex®.

Editorial Department Employees

All employees (regular and temporary) in the Editorial Department are subject to this Conflict of Interest Policy throughout their employment with MERATIVE. Employees are required to complete and sign an FDF prior to beginning work for the Editorial Department and shall have continuing obligations to abide by this Policy and inform their managers of any change in their FDF disclosures or other circumstances requiring further review under this Policy. Employees will be required to update their disclosures annually by completing a new FDF.

II. General Rules for Identifying and Resolving Conflicts of Interest

When a new content development activity is begun such as review of a particular indication, the Editorial Department will review the financial relationship information from the Worker and identify any financial relationships. If possible, the Editorial Department will select Workers to assist with the content development who have not identified any pertinent financial relationships. Where that is not possible due to a limited pool of available, qualified individuals, the rules in the following sections for different types of financial relationships will be applied.

III. Domestic Partner Description

The following interests in Pharmaceutical Companies are considered to create a potential conflict of interest. In each case, the policy describes the scope of the interest and how it should be addressed. The policy is intended to cover the combined financial interests of the Worker and the Worker's spouse and/or domestic partner as defined below (a spouse or domestic partner will be referred to as a "Partner.") Someone is a domestic partner if either:

- the domestic partnership has been registered with a governmental entity pursuant to state or local law authorizing such registration; or
- the Worker and domestic partner satisfy all the following criteria:
 - are at least 18 years old

- are not legally married to anyone else and are not the legal domestic partner of anyone else, nor have been for the preceding 6 months
- intend to remain each other's sole domestic partner indefinitely
- reside together in the same principal residence and intend reside together indefinitely
- are emotionally committed to each other and share joint responsibilities for each other's common welfare and financial obligations
- are not related by blood closer than would prohibit marriage in the state of residence
- are mentally competent to enter into contracts.

IV. Rules for Specific Financial Relationships

A. Employment or Leadership Positions

- A Worker who currently or within the past six months (a) is or was an employee, or (b) holds or held a position as a director, officer of, or a partner in, any Pharmaceutical Company shall be excluded from content development.
- Where the Worker's Partner is an officer or director of, or a partner in, any Pharmaceutical Company, the Worker shall be excluded from content development.

B. Equity or Stock Ownership

- This section applies only to stock or equity ownership in a Pharmaceutical Company where the Worker or the Worker's Partner has direct control over the disposition of that ownership interest. It does not include an interest in stock held via a diversified fund, such as a mutual fund, which is under the control of another.
- Where the combined value of the stock or equity ownership in any single Pharmaceutical Company held by the Worker and/or the Worker's Partner totals \$25,000 or less, the Worker shall be allowed to participate in content development.
- Where the combined value of the stock or equity ownership in any single Pharmaceutical Company held by the Worker and/or the Worker's Partner is greater than \$25,000 but less than \$100,000, the Worker shall be allowed to participate in content development and the Worker's interest shall be disclosed.
- Where the combined value of the stock or equity ownership in any single Pharmaceutical Company held by the Worker and/or the Worker's Partner is greater than \$100,000, the Worker shall not be permitted to participate in content development.

C. Advisory/Consulting Role; Lecture/Speaking and Expert Witness Fees and Payments of Other Sorts

- This section addresses fees and payments for a Worker's or their Partner's service as an advisor, consultant or expert witness for a Pharmaceutical Company, and lecture fees and other honoraria from a Pharmaceutical Company.
- Where the Worker and/or the Worker's Partner has received payments with a combined value of less than \$25,000 from any single Pharmaceutical Company within the past twelve (12) months, the Worker shall be allowed to participate in content development.
- Where the Worker and/or the Worker's Partner has received payments with a combined value of more than \$25,000 but less than \$100,000 from any single Pharmaceutical Company within the past twelve (12) months, the Worker shall be allowed to participate in content development and the Worker's interest shall be disclosed.

- Where the Worker and/or the Worker’s Partner has received payments with a combined value of more than \$100,000 from any single Pharmaceutical Company within the past twelve (12) months, the Worker shall not be permitted to participate in content development.

D. Research Funding

- Where a Worker or a Worker’s Partner has received research funding as a principal investigator in the past twelve (12) months from any Pharmaceutical Company, the interest shall be disclosed.
- No Worker may be permitted to participate in the review of their own or their Partner’s research.

E. Patents or Royalties

- Where a Worker or a Worker’s Partner holds a patent or other intellectual property or royalty rights in a drug that is the subject of the current content development, or that is related to the current content development, the Worker shall not participate in content development. The determination of whether a drug is related to the current content development will be made by the Editorial Department.
- Where the Worker or the Worker’s Partner holds a patent or other intellectual property or royalty rights on an unrelated product and receives payments from any Pharmaceutical Company based on those rights, the following rules shall apply:
 - Where the Worker and/or the Worker’s Partner has received payments with a combined value of less than \$25,000 from any single Pharmaceutical Company within the past twelve (12) months the Worker shall be allowed to participate in content development.
 - Where the Worker and/or the Worker’s Partner has received payments with a combined value of more than \$25,000 but less than \$100,000 from any single Pharmaceutical Company within the past twelve (12) months, the Worker shall be allowed to participate in content development and the Worker’s interest shall be disclosed.
 - Where the Worker and/or the Worker’s Partner has received payments with a combined value of more than \$100,000 from any single Pharmaceutical Company within the past twelve (12) months, the Worker shall not be permitted to participate in content development.

V. Disclosures

The website at [Micromedex Training Center](#) will be the central location for the disclosure of all pertinent financial relationships that need to be disclosed for the Micromedex publications. This disclosure shall identify the name of the Worker, the name of the Pharmaceutical Company or companies, and the general nature of the financial relationship (eg, consultant, grant recipient, equity ownership).

VI. Waivers and Exceptions

In some circumstances, it may be appropriate to deviate from the basic conflict of interest rules set forth above, either to grant a waiver from a financial relationship that otherwise would require disqualification or disclosure, or to require disqualification or disclosure where otherwise not applicable. For example, an otherwise disqualified Worker who possesses unique expertise in a particular field that is unavailable from other sources will be a valuable contributor to content development and could be used if necessary with an appropriate disclosure.

The Editorial Department reserves the right to limit, on any basis, any Worker’s participation in content development, including for financial relationships otherwise permissible under the terms of this policy.

All waivers and exceptions must be reviewed and approved in writing by the Editorial and Legal Departments. Changes may be made to this Conflict of Interest policy at the sole discretion of the Editorial Department.