

THOMSON MICROMEDEX

Conflict of Interest Policy**EXECUTIVE SUMMARY**

This document sets forth policies and procedures to help ensure individuals involved in literature evaluation and content development for Micromedex databases and products are free from financial conflicts of interest. Micromedex 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 resolve potential conflicts of interest for Micromedex external advisors involved in the content development process.

BACKGROUND

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

Particularly for outside advisors, the individuals 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.

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 thus 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 will be referred to as a pharmaceutical company, meaning a company that sells and markets a pharmaceutical product.

EXTERNAL ADVISORS**Collecting Information on Financial Relationships**

Before utilizing any external advisor, Micromedex will collect information on the individual's financial relationships with pharmaceutical companies. Information will be collected on the Financial Disclosure Form.

(continued)

CONFLICT OF INTEREST POLICY (CONT)

The Micromedex Editorial Department (“Editorial Department”) will be responsible for ensuring that the forms are completed and maintained by Micromedex. Forms will be completed upon the beginning of an advisor’s term on an advisory panel and annually thereafter. In addition, the Editorial Department will request the advisor to update any financial disclosure information 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, the person shall be disqualified from participation in content development for Micromedex.

General Rules for Identifying and Resolving Conflicts of Interest

When a new content development activity begins such as review of a particular indication, the Editorial Department will review the financial relationship information from the potential external advisors to be used and identify any financial relationships. If possible, the Editorial Department will select advisors to assist with the content development without any pertinent financial relationships. Where that is not possible because of the available pool of qualified individuals, the rules in the following section for different types of financial relationships will be applied.

Rules for Specific Financial Relationships

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 advisor and the advisor’s spouse.

Employment or Leadership Positions

- » An individual who currently or within the past six months (a) is or was an employee, or (b) holds or held a position as a director of, or a partner in, any pharmaceutical company shall be excluded from participation.

- » Where the individual’s spouse is an officer or director of, or a partner in, any pharmaceutical company, the individual shall be excluded from participation.

Equity or Stock Ownership

This section applies only to stock or equity ownership in a pharmaceutical company where the individual or the individual’s spouse 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 individual and/or the individual’s spouse totals \$25,000 or less, the individual shall be allowed to participate.

- » Where the combined value of the stock or equity ownership in any single pharmaceutical company held by the individual and/or the individual’s spouse is greater than \$25,000 but less than \$100,000, the individual shall be allowed to participate and the individual’s interest shall be disclosed.

(continued)

CONFLICT OF INTEREST POLICY (CONT)

- » Where the combined value of the stock or equity ownership in any single pharmaceutical company held by the individual and/or the individual's spouse is greater than \$100,000, the individual shall not be permitted to participate

Advisory/Consulting Role; Lecture/Speaking Fees and Payments of Other Sorts

This section addresses fees and payments for an individual's or their spouse's service as an advisor or consultant to a pharmaceutical company, and lecture fees and other honoraria from a pharmaceutical company.

- » Where the individual and/or an individual's spouse has received payments with a combined value of less than \$25,000 from any single pharmaceutical company within the past twelve (12) months, the individual shall be allowed to participate.
- » Where the individual and/or an individual's spouse 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 individual shall be allowed to participate and the individual's interest shall be disclosed.
- » Where the individual and/or an individual's spouse has received payments with a combined value of more than \$100,000 from any single pharmaceutical company within the past twelve (12) months, the individual shall not be permitted to participate.

Research Funding

- » Where an individual or an individual's spouse has received research funding as a principal investigator in the past twelve (12) months from any pharmaceutical company, the interest shall be disclosed.
- » No individual may be permitted to participate in the review of their own or their spouse's research.

Patents or Royalties

- » Where an individual or an individual's spouse 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 individual shall not participate. The determination of whether a drug is related to the current content development will be made by the Editorial Department.
- » Where the individual or an individual's spouse 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 individual and/or an individual's spouse has received payments with a combined value of less than \$25,000 from any single pharmaceutical company within the past twelve (12) months the individual shall be allowed to participate.

CONFLICT OF INTEREST POLICY (CONT)

- Where the individual and/or an individual's spouse 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 individual shall be allowed to participate and the individual's interest shall be disclosed.
- Where the individual and/or an individual's spouse has received payments with a combined value of more than \$100,000 from any single pharmaceutical company within the past twelve (12) months, the individual shall not be permitted to participate.

DISCLOSURES

Wherever a financial relationship must be disclosed, the disclosure will be acknowledged. The Micromedex Web site at www.micromedex.com will be the central location for the disclosure of all pertinent financial relationships that need to be disclosed for the Micromedex publications. This disclosure may identify the name of the individual, the name of the pharmaceutical company or companies, and the general nature of the financial relationship (e.g., consultant, grant recipient, equity ownership).

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 advisor 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.

Micromedex reserves the right to limit, on any basis, any individual'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 Department and Legal. Changes may be made to this Conflict of Interest Policy at the discretion of Micromedex.



www.micromedex.com

Corporate Headquarters
6200 S. Syracuse Way, Suite 300
Greenwood Village, CO 80111-4740 USA
Tel (303) 486-6400
Toll-free (800) 525-9083
Fax (303) 486-6464

International Support
Tel +1 303 486-6444
Fax +1 303 486-6480