



MEMORANDUM TO CLIENTS

COMPLIANCE AND CORPORATE ETHICS

November 10th, 2017

Questions and Answers (Q&A) prepared by the Ministry of Transparency and General Comptroller of the Union ("CGU") and Interfarma regarding Normative Instruction CGU-CEP No. 1/2016.

"Will Normative Instruction No. 1/2016 be applicable to public agents that carry out their activities in private institutions, such as hospitals and clinics? In which circumstances is a company permitted to pay for public agents' transportation, accommodation, food and event registration fees? The definition of "public agent" was based on which legal provision?"

Above are some of the questions answered in the Q&A booklet released by the CGU on its website, which was prepared with the collaboration of the Pharmaceutical Industry Research Association (Interfarma). The purpose of the booklet is to clarify certain concerns which regularly arise in the pharmaceutical industry and indicate best practices regarding the participation of public agents in events or activities paid for by private institutions in the sector.

This joint initiative resulted from various discussions involving players in the pharmaceutical industry relating to the application of Normative Instruction No. 1/2016, which establishes rules to be observed by federal public agents when participating in events or activities paid for by private institutions.

Normative Instruction No. 1/2016 became greatly relevant in answering questions about potential conflicts of interests and payments of inappropriate benefits in events that are sponsored by private companies and attended by public agents.

Accordingly, the booklet seeks to provide standards and increase transparency in the application of Normative Instruction No. 1/2016, so that policies and procedures on integrity adopted by private companies may be improved and aligned with CGU's position.

The purpose of this memorandum is to inform our clients about important changes and developments in the area of law. We remain at the reader's disposal for any additional information that may be desired regarding the subject matter herein.

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In the booklet, CGU recommends that private companies analyze certain matters before inviting and paying the expenses of public agents to attend a private event in order to avoid a potential conflict of interest

In summary, the discussions resulted in this document being made available by CGU and Interfarma, which contains answers to the 10 most frequent questions on this topic. Please [click here](#) to access the Portuguese version of the document.

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