

Corporate Ethics Policy for Support from Organizations with Commercial Interests in Hepatitis B and Liver Cancer

Hepatitis B Foundation (HBF) considers first and foremost its mission in serving its constituents in all decisions, including whether to enter into a relationship with a funder or partner. In many cases, activities that fulfill HBF's mission cannot be accomplished as well alone as they can be through collaboration and alliances among like-minded organizations. It is for this reason that HBF seeks to forge appropriate and productive collaborative relationships with corporations, businesses and/or other relevant partners. Some of these corporations may sell products that people with hepatitis B and/or health professionals utilize, consume or prescribe in the market.

This policy is designed to inform corporations and potential partners of the standards and practices under which HBF will consider collaborating and forming corporate relationships. It is also designed to inform the public about the guidelines under which HBF enters into relationships with for-profit entities. This policy does not apply to an organization that chooses to make a donation to HBF and seeks nothing in return.

To assure that conflicts of interest do not occur and that perceived conflicts are minimized, HBF's Board of Directors ("Board") has determined that acceptance of restricted or unrestricted gifts from commercial enterprises, and HBF's subsequent relationship to these partners, shall be governed by the following principles:

1. Independence: HBF exercises independent judgment in all its decision making and in the implementation of any agreed upon activities related to the corporate relationship.

- Funding from corporations for projects and educational programs are in the form of charitable donations or unrestricted educational grants. While we welcome input from our corporate partners, HBF has ultimate authority over program development, content and speaker selection.
- HBF programs and policy positions on issues affecting the welfare of people with hepatitis B and liver cancer are not influenced by corporate financial support. The potential effect of such positions on the commercial interest of a funding source shall not be a relevant factor in HBF's decision-making process.
- HBF will accept funds for projects involving educational and informational services only when HBF has editorial, program and managerial control or HBF approves or agrees with the educational product. At HBF's discretion, the corporate partner may provide review and comment regarding program, policy recommendations and informational materials to be published.
- HBF holds final approval of all uses of its name, logo or identifying symbols. HBF's name cannot be co-branded on any product but may be used in association with acknowledging support and /or sponsorship.
- HBF will not permit presentations that support a commercial product except under the following conditions:
 - a. Commercial exhibits at which corporate partners are welcome and professional standards of conduct are expected.
 - b. Presentation of scientific data at professional meetings organized by an independent planning committee.

- HBF will not accept funds for, nor will it sponsor or co-sponsor any project or program in which the program activities or their promotion are tied directly to the commercial products of the funding source.
- Any corporate partner wishing to reference HBF in any public relations, marketing or promotional materials or activities, must first seek the prior review and written approval of HBF.
- HBF does not sell or share its mailing list.

2. Mission-related benefit: The relationship provides a meaningful mission-related benefit to the general public or particular constituencies of HBF.

3. Consistency: The relationship is consistent with HBF's principles, public positions, policies, and standards.

- HBF will accept restricted funds only for activities that are consistent with the goals and objectives of the HBF mission unless otherwise reviewed and approved by Leadership Council (President and Vice-Presidents) and/or the Board.

4. Adherence: The relationship adheres to all applicable state and local laws and regulations.

- HBF will be accountable to the funding source by ensuring that the funds will be applied to the program or project purposes intended.

5. Transparent and Non-Deceptive Communications:

- HBF will publicly disclose funding sources. Speakers representing HBF will clearly disclose funding sources.
- HBF will ensure that corporate partners associated with business interests in hepatitis B and liver cancer are familiar with the ethical principles listed above and that any relationship involving financial support acknowledges their understanding of these principles.

5. Privacy: HBF is committed to protecting the privacy of people participating in corporate-sponsored activities and/or programs.

6. Compliance: HBF has developed a mechanism to assure compliance with its corporate relations policy (see Addendum A, Operating Guidelines).

7. Balance: HBF evaluates on an annual basis the total amount of charitable corporate support received as a percentage of total revenue.

Types of Corporate Support - Potential corporate relationships are generally characterized by one or more of the following activities:

- **Program Sponsorships:** HBF may seek sponsored support for HBF conferences, meetings or educational programs.
- **Event Sponsorships:** HBF may seek support for fundraising events (including the HBF gala).
- **Strategic Alliance or Partnership:** This includes ongoing, longer-term, mutually beneficial collaborative relationships between HBF and a corporation. It may not necessarily involve a monetary exchange.
- **Product promotion** – HBF does not accept financial support from companies for product promotion. This includes accepting support for activities that could be perceived as buying special privileges, such as directing a meeting agenda or guiding content of educational materials, or influencing the outcome of a specific research program.
- **Advertising** - HBF does not sell advertising on our website. However, corporate and individual donors may be thanked for their support of a program in the form of a link to their website from our website. A link to a supporter's website from the HBF site is not an endorsement of any product or service.
- **Patient Opportunities (Promotion, Education and Recruitment)** – HBF can receive support to provide information to the general public, as well as those with special interest, about available opportunities for participation. However, to ensure accessible information to the community, HBF is committed to providing accurate and balanced education, information and resources about *all* relevant and appropriate research and patient opportunities, including clinical trials. HBF does not seek to influence individual choice about participation in any research program or clinical trial.
- **Endorsements:** HBF does not endorse products or services.
- **Certifications:** HBF does not and will not engage in certification of products or services.
- **Information exchange:** HBF may work with companies to exchange relevant information. This includes offering insight on the hepatitis B patient experiences, needs, barriers and strategies as they relate to the continuum of care for hepatitis B. HBF may bring together patients, advocates, and company representatives for information exchange, as long as the principles in these guidelines are adhered to, with the understanding that outcomes of these interactions will be shared with all participants. HBF may provide consultation to a company if the consultation is consistent with the HBF mission. HBF can provide companies with community-wide observations, needs, barriers and patient perspectives.

Addendum A - Operating Guidelines

These operating guidelines describe the processes and procedures to be followed by HBF staff in seeking and implementing corporate relationships.

Screening: At the outset, each proposed corporate relationship will be evaluated to determine whether it meets the criteria in the board-approved Corporate Relationships Policy. In addition, each proposal will be evaluated considering HBF's goals, strategies, priorities and policies; alignment of the mission; net benefits to HBF; risks; availability of resources; timelines; proper control and implementation; and evaluation.

Written Agreement: Once the components of the corporate relationship have been finalized, the appropriate HBF staff will prepare a written agreement that includes all of the elements specified in the board-approved Corporate Relationships Policy. The written agreement will be reviewed, approved and signed by the President and/or appropriate Vice-President prior to execution and implementation. The written agreement will clearly indicate:

- The amount of money that will be transferred to HBF;
- Whether the payment is unrestricted or earmarked to support a particular event or program activity;
- The manner in which each party will disclose the support to the general public, (on websites, annual reports, etc.);
- That HBF retains complete control of and right of approval over all content related to the event or program activity;
- Likewise, that HBF must approve all uses of its name/logo and identifying marks.
- That ads, promotional materials and any health messages should be reviewed and approved in advance by the appropriate HBF staff members.
- The corporation's materials cannot suggest or reasonably imply an endorsement or recommendation by HBF.

Disclosure: HBF will, unless otherwise prohibited by law, disclose financial support it receives as a result of corporate relationships. HBF will disclose amounts received from corporations identified on Schedule B of its Form 990. HBF will publish disclosure information in a format easily accessible to the public (website, annual report) within six months of the close of the calendar year.

Exclusivity: In general, and whenever possible, there will not be exclusive arrangements for program support and partnership. However, exclusivity is acceptable for certain event sponsorships or particular activities if appropriate, for a limited, specified period of time.