



Teva's
Position on
Marketing and
Promotional
Practices



Teva Pharmaceutical Industries Ltd (hereinafter “Teva”), including all its directors, executives, employees and subsidiary and affiliated companies, always strives to be a positive corporate citizen, offering healthcare solutions that enable people to feel better and live better days. We engage in marketing and promotional practices to ensure healthcare systems, healthcare professionals and patients are aware of our medicines and can access them through the relevant channels as part of a prescribed treatment program. At all times, we operate within laws and globally defined principles governing marketing and promotion of pharmaceutical products and ensure our teams at Teva are trained and committed to not only compliant, but also ethical, honest and fair practices.

We educate, inform and discuss marketing issues with employees to ensure all those with roles affected by our position on marketing practices are aware of our expectations and their responsibilities.

Our Marketing and Promotional Practices Approach and Commitments

Healthcare for all: We believe all individuals should have access to high-quality healthcare. As the world’s leading provider of generic medicines, access to our portfolio of branded and generic medicines is an essential element of national healthcare systems. Within the constraints of the law, we wish to ensure prescribers, payers and patients are aware of the possible treatment solutions available to them by providing factual and accurate information about our medicines.

Honest, complete and accurate communications: We always represent our products truthfully and completely as possible so individuals can make informed decisions. Accuracy of communications about our products is paramount to Teva.

Adhering to globally defined principles: We recognize our position as part of the global community of pharmaceutical and healthcare players and respect the principles defined by different bodies around the world governing marketing and promotional practices. We support and apply the following principles in our business:

- [World Health Organization \(WHO\): Ethical Criteria for Medicinal Drug Promotion](#)
- [Pharmaceutical Research and Manufacturers of America \(PhRMA\) Code: Principles on responsible sharing of information about medicines with healthcare professionals and payers](#)
- [International Federation of Pharmaceutical Manufacturers Associations \(IFPMA\) Code: Code of Pharmaceutical Marketing Practices](#)
- [European Federation of Pharmaceutical Industries and Associations \(EFPIA\) Code of Practices: Code on the promotion of prescription-only medicines to, and interactions with, healthcare professionals](#)
- [World Self-Medication Industry \(WSMI\) Policy: Advertising of non-prescription medicines to the public](#)

Applying controls for promotional materials: Promotional materials include any items for advertising of communication purposes of any nature – posters, stands, desktop items or all forms of communications via any channels that mention or highlight a Teva product or brand. In all cases, materials will be relevant, appropriate, science-based and consistent with regulatory guidelines. Promotional materials undergo detailed review and explicit approval by medical, legal and regulatory teams at Teva prior to use. Teva’s global internal audit department periodically audits marketing and promotional material compliance. Similarly, Teva maintains a global and comprehensive compliance program that meets or exceeds all of the elements proposed by the

U.S. Department of Justice, Office of the Inspector General. This includes a systematic annual risk assessment supported by corrective actions as required across different Teva divisions and in different markets.

Relationship with healthcare professionals: All our dealings with healthcare professionals and healthcare organizations are conducted under the strictest ethical guidelines and adhere to regulations and principles governing marketing and promotional practices. Similarly, we operate according to transparent and ethical principles in all our dealings with patient organizations (see [Teva Guiding Principles for Patient Organization Engagement](#)).

Training and education: We maintain regular training and educational programs for our employees so they can stay up to date with necessary scientific, medical and regulatory information relating to our products. Such information determines how products may be communicated in our markets to provide our healthcare communities with all relevant information while upholding the principles of responsible marketing.

Governance Structure for Marketing and Promotional Practices Management

Marketing and promotional practices are under the responsibility of the Executive Vice President for Global Marketing & Portfolio, and the implementation in our markets is under the accountability of the Executive Vice Presidents for Commercial in each of our business regions.

Application of this Position

This position is endorsed by Teva's Board of Directors. It is supported by internal processes that ensure our commitments are upheld, including periodical internal audits. We communicate this position to our employees and publicly on our website, and we disclose relevant updates in our annual Social Impact Reports.