

Sponsorship of HCOs and POs



What, Who, How to comply when sponsoring an HCO or PO?

WHAT is a Sponsorship?



A sponsorship is a **financial or non-financial contribution** that a pharmaceutical company makes to support an activity organised by a Healthcare Organisation (HCO), a Patient Organisation (PO), or a Professional Congress Organiser (PCO).



In return, the company receives a legitimate business benefit: for example, publicity, booth space, advertising in the event programme, the opportunity to run a satellite symposium, or having its name associated with the activity.



Sponsored activities include medical congresses, or disease-awareness projects.

WHO can be Sponsored?



Healthcare Organisations (HCO) and Patient Organisations (PO) (section 13.03)



When a company sponsors through a Professional Congress Organiser (PCO), the support is understood to be directed at the HCO/PO at arm's length (Annex B).



Companies may also financially support individual HCPs and PO Representatives to attend events (Article 13.01).

HOW to comply - key rules to follow



Sponsorship **must never** serve as an **inducement** to prescribe, purchase, supply, or recommend specific medicines.



Independence : The sponsor must not control or get involved in the content or running of the sponsored activity — beyond providing the agreed support.



Multiple sponsors encouraged: Never require to be the sole sponsor. On the contrary, funding from several sources is preferable and should be actively encouraged.



Transparency: Clearly acknowledge the company's support from the outset; obtain written permission before using an HCO's or PO's logo.



Medical & scientific merit: Sponsored activities must deliver genuine (*bona fide*) medical education — improving HCP knowledge in a disease area or improving patient outcomes.



e4ethics check: For large third-party European congresses (>500 HCPs from ≥5 EFPIA countries), confirm a positive e4ethics/CVS assessment before committing any support.



Fair Market Value: The promotional benefit the company receives (e.g., visibility, booth space) must be proportionate to the sponsorship amount.



Sponsorship **must not** be used to cover the HCO's or PO's **routine operating costs**. Companies should assess on a case-by-case basis whether part of the sponsorship may cover overheads directly related to the sponsored activity.



Disclosure: Transfers of value (ToV) to HCOs must be disclosed under "Sponsorship agreements with HCOs / third parties appointed by HCOs to manage an Event". Indirect ToVs through PCOs follow Annex B guidance. Financial and non-financial support to POs must be disclosed per Article 24.

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Real Life Scenarios

Q1: Can a pharma company sponsor the Wi-Fi at a congress and display its company name on the login page?

A: No. Company or product names must not appear on items available to all congress attendees, such as the Wi-Fi access page. Sponsoring companies should instead be acknowledged in congress-related materials and on the event premises.

Q2: A pharma company didn't ask to be the sole sponsor — but no other company came forward. Is this a Code breach?

A: Not necessarily. The rule is that a company must not require to be the sole funder. If, despite encouraging multiple sponsors, the company ends up being the only one, that alone does not breach the Code.

Q3: Can a pharma company sponsor the distribution of treatment guidelines published by a learned society?

A: Yes — distributing such guidelines is a permitted activity under the Code. However, because of the risk that it could be perceived as product promotion, the company should carefully evaluate the perception created by its name being associated with treatment guidelines.

Q4: Can a pharma company sponsor Patient Organisation representatives to attend a scientific congress?

A: Yes, provided that PO Representatives are allowed to attend, do not get access to the HCP exhibition area (or as per local rules), the congress organiser offers a registration option for such delegates, and there are sessions in the agenda aimed at POs and their representatives.

Q5: What types of items should be reported under "Sponsorship Agreements" for disclosure purposes?

A: Examples are rental of exhibition booths, satellite symposia at a congress, sponsoring of speakers or faculty, items included in an organiser's package (e.g. catering, room hire, audio-visual equipment), learning sessions provided by an HCO. The Methodological Note can provide additional clarification.

Q6: How should a pharma company disclose sponsorship when a third party organised an event on behalf of several HCOs?

A: If it is not possible to allocate the transfer of value to each HCO individually, it is reasonable to assume similar levels of involvement. In that case, divide the total amount equally among the HCOs and report each as having received an equal share. The Methodological Note can provide further detail.

Curious to know more about Sponsorship of HCOs and POs?

Tip: Always check the applicable law and code in the country where the sponsored HCO/PO is registered as well as the country where the sponsored activity/event takes place (if different); the stricter rules apply.

Please refer to following link or connect with your Ethics & Compliance Officer:

[Chapter 2 \(articles 10 to 15\), pages 19-22](#)

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