

## **Policy Direction - Industry Partner Relationships (Pharmaceutical, Medical Devices and Healthcare Products)**

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### **Rationale and Relationship to Vision, Mission, and Values**

MS Canada has nurtured a mutually beneficial relationship with the corporate sector for many years. With the development of specific therapies indicated for treatment of MS and allied diseases<sup>1</sup>, pharmaceutical, medical devices and healthcare product companies (herein referred to as 'industry partners') have been asked to, or have offered to, support, partner and/or sponsor MS Canada programs. The relationship may be in the form of direct donations or monetary support for activities related to educational programs, advocacy efforts, research projects, and fundraising events. MS Canada will not endorse, recommend, or promote any drug or health product.

\*\*Cannabis products are not covered under this policy. A Licenced Cannabis Producer Relationship policy has been developed.

Support from industry partners aids in fulfilling the mission of the organization. Through industry partnerships, MS Canada is better able to meet the needs of people affected by MS and allied diseases, including advancing research, empowering people affected by MS through education, raising awareness around advocacy and policy change, increasing stakeholder engagement, and providing industry partners the opportunity to hear the needs of those impacted by MS and allied diseases.

### **Policy Objective**

This policy provides a framework under which MS Canada can accept industry partner funds, while maintaining the values and mission of the organization, ensuring that the relationship is transparent and centered around the person affected by MS and allied diseases. The related procedures are an integral part of MS Canada's approach to working with industry partners; both the policy direction

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<sup>1</sup> MS Canada defines allied diseases as Neuromyelitis Optica Spectrum Disorder (NMOSD) and Acute Demyelinated Encephalomyelitis (ADEM).

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and the procedures shall be followed when undertaking programs funded through industry partnerships.

## **Policy Application**

This policy applies to staff and volunteers at MS Canada and the relationship they hold with industry partners that manufacture prescription or non-prescription products (pharmaceuticals, over-the-counter drugs, vitamins, dietary supplements, medical devices, and other non-medicinal healthcare products).

## **Authorization**

The policy was approved by the MS Society Board of Directors on May 19, 2021. It replaces the Pharmaceutical Industry Relationships Policy.

## **Policy Details**

The Executive Team is authorized to develop/update detailed procedures for this policy direction no later than six months following its approval.

### **1.0 Guiding Principles**

- 1.1. MS Canada is permitted to accept funds from industry partners provided this policy direction, the Industry Partner Relationships, the Industry Partner Relationship Procedures, the [Acceptance of Gifts Policy Direction](#) and any related procedures are followed.
- 1.2. MS Canada should seek financial support from all relevant industry companies. While it is permitted to designate specific projects or programs to industry partners, it is not allowable to have a single, exclusive financial support through partnership or sponsorship with one company for all projects and programs.

Cause marketing or direct proceeds (regardless of percentage) from sales of therapeutics (prescription medications, OTC, supplements, medical devices) bearing an industry partner company or product logo are not permissible.

MS Canada may share (digital) products developed in partnership with industry (print material, websites, apps, or other digital products). MS Canada may share products developed by industry partners related to patient support programs listed for Health Canada approved disease modifying therapies under the Treatments section of the website and through event

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collateral as part of a sponsorship tangible benefit. *See section 10.0 Wearing or using industry partner company materials.*

Industry partner products shared on MS Canada channels must carry a Health Canada approval and published evidence to support its use in MS.

MS Canada may share industry partner products that do not require medical consultation (such as adaptive clothing, cooling apparel, adaptive devices) on a case-by-case basis by sharing the company name and website address only. Product placement (excluding patient support programs) on an MS Canada channel in exchange for sponsorship is not permissible.

- 1.3. Industry partners may, when appropriate and as per signed partnership agreement, set up an exhibitor’s booth at an MS Canada hosted event. Only the company logo may be displayed. Product branding including drug product logos or promotion of said products is not permitted. As exhibitors, industry partners may highlight digital products or other educational devices that have been approved by MS Canada. Examples include but are not limited to virtual reality goggles, MS simulation bike, MS simulation house, industry developed patient education apps and patient support programs. These educational devices are permitted provided the logo displayed is the company logo not a drug product logo. Where applicable, industry partners must satisfy safety and/or ethical concerns of MS Canada prior to displaying any educational device/product/program.
- 1.4. Industry partners that provide support may work in collaboration with MS Canada to develop content, however they will not determine how MS Canada presents information. MS Canada will oversee the final content. MS Canada shall rely on documented scientific evidence, including Health Canada material, and in consultation with MS Canada medical advisors in presenting such information. MS Canada shall be transparent and acknowledge support of industry partners in appropriate ways as detailed in the procedures.

## **2.0 Programs and projects eligible for industry partnership support**

Following are broad categories of programs and projects that are eligible for and frequently supported by industry partners. *See 3.0 for a list of programs and projects that are not eligible for pharmaceutical industry support.*

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- 2.1 Educational programs, including educational materials, for people living with MS and allied diseases, family members, caregivers, or healthcare professionals.
- 2.2 Staff and volunteer training and/or strategy development meetings.
- 2.3 MS Canada -initiated research projects including innovative approaches such as partnering to commercialize research findings to speed the development of therapies for MS and allied diseases.
- 2.4 Advocacy programs or activities to influence governments, government agencies and private industry to benefit people living with MS and allied diseases, family members and caregivers.
- 2.5 Sponsorship of fundraising events including nation-wide events (MS Walk, MS Bike, Women Against MS - WAMS).
- 2.7 Industry partner participation in fundraising events as fundraising teams.
- 2.8 Major gifts either directed to a specific program or project or general support.
- 2.9 Training programs for researchers and trainees.

### **3.0 Educational materials not eligible for industry partner support**

Certain kinds of educational materials are not eligible for funding by industry partners. The list may be amended periodically and as such the procedures document should be reviewed if an amendment has been made to ensure alignment between policies and procedures. The intent of this prohibition is to ensure there is no perception of external influence on the content of these fundamental MS Canada documents. Materials not eligible may include but are not limited to:

- 3.1 Annual or impact reports.
- 3.2 General information brochures about MS Canada.
- 3.3 General information (digital or printed) about membership in MS Canada.
- 3.4 General information about programs and services, e.g., digital or print available from MS Canada.

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#### **4.0 Standard written agreement**

MS Canada at the appropriate level shall review the written agreement with the industry partner. The agreement must recognize the autonomy and independence of MS Canada, and that MS Canada is solely responsible for the identification of needs, determination of objectives, selection of content and speakers (where such are used) and execution of programs and projects that are supported by industry partners. MS Canada must review the agreement letter from the industry partner and where necessary negotiate any terms which do not align with the industry partner relationships policy.

#### **5.0 Authority to sign agreements**

Agreement may only be signed by signing officers of MS Canada. Consult supervisor for directive if unknown.

#### **6.0 Recognition of support**

MS Canada shall acknowledge support by industry partners for all sponsored programs and projects. References shall be made only to the corporate name and corporate logo of the company, or logo of the company's patient support program, not to specific pharmaceutical products. Speakers shall disclose to the audience any financial relationship they have with industry partners.

Conversely, industry partners may request to include MS Canada logo in presentations intended for internal corporate use. Industry partners shall not use MS Canada logo without MS Canada's prior written consent. Industry partners may request permission to publish (in print or electronically) MS Canada website address through their patient education collateral or website. Industry partners shall not publish MS Canada website address without MS Canada's prior written consent.

#### **7.0 Endorsement**

MS Canada shall not endorse any product or service provided by any company or organization. MS Canada may share an industry partner patient support program contact information including website address and is not considered product endorsement. Information related to patient support programs must be presented equally on the 'Treatments' section of the website and published within event collateral, where offered as part of a sponsorship agreement, ensuring the same language is used for all industry partners. Direct website links to industry partner branded products or services (digital or printed material, including but not limited

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to apps, websites, brochures) other than a patient support program would be considered an endorsement and is not permissible.

### **8.0 Privacy and confidentiality**

MS Canada shall maintain the privacy and confidentiality of people affected by MS and allied diseases as per the MS Canada [Privacy and Confidentiality Policy Direction](#). MS Canada staff and volunteers shall not provide industry partner representatives with names and other contact information of people affected by MS. This includes mailing lists of any kind.

MS Canada does not provide industry partners, market research or other third-party companies with direct contact information for people affected by MS or allied diseases, including but not limited to, membership or patient lists.

### **9.0 Gifts and honoraria**

MS Canada staff and governance volunteers, who are Board Directors, officers, and members of board standing committees at any level of MS Canada, shall not accept honoraria of any amount from industry partners while acting on behalf of MS Canada. MS Canada staff and governance volunteers may accept reimbursement for appropriate expenses (such as out of pocket expenses including travel, accommodation, and meals during the timeframe of the industry partner sponsored event) that align with MS Canada’s travel policy and per diem rates. Speaker gifts are not included through industry sponsorships.

MS Canada will not provide honoraria to speakers however will reimburse out of pocket expenses incurred while participating in an MS Canada hosted event. Should industry partners provide honoraria to keynote or guest speakers for an MS Canada event that they have supported through a grant or donation, this agreement shall take place between the industry partner and the speaker independent of the contractual agreement held with MS Canada.

### **10.0 Wearing or using industry partner company materials**

MS Canada staff and volunteers acting on behalf of MS Canada shall not wear or use articles bearing industry partner company names, product names, logos, or other insignia. This includes items of clothing, pens, notepaper, binders, and similar materials.

An exception is allowed for MS Canada staff and volunteers acting on behalf of MS Canada if the industry partner is a sponsor of an MS Canada event or program. In

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those cases, MS Canada staff and volunteers acting on behalf of MS Canada may wear and/or use the labelled materials in the context of the event or program (e.g., sponsor logo on event t-shirts, conference lanyards and other conference collateral).

### **11.0 Industry partner company displays and materials**

In Canada, industry partner companies are not allowed by law to advertise prescription drugs directly to consumers except under limited circumstances. Industry partner companies shall not promote their products at any MS Canada program or event that is open to people affected by MS and allied diseases and/or the public through displays or materials that includes the name of the product. Industry partner companies may be sponsors and be offered the opportunity to be recognized in meeting programs, on signage, and through verbal acknowledgement. Only the name of the company can be used, not the product.

An exception is allowed for programs for which the primary audience is healthcare professionals and not people affected by MS and allied diseases.

### **12.0 Non-monetary partnership opportunities**

MS Canada will receive requests from industry partners to participate in patient committee meetings, advisory boards, stakeholder meetings, assist with promotion of a patient-focused program, market research surveys, focus groups or other patient group input activities. The following principles will guide how MS Canada engages with industry partners for these non-monetary opportunities.

#### ***MS Canada will:***

- Ensure all industry partnerships align with MS Canada’s strategic priorities
- Only participate in industry hosted advisory boards that provide strategic opportunities to advocate on behalf of Canadians affected by MS and allied diseases. MS Canada may also engage volunteers to participate in these activities as appropriate.
- Ensure patient anonymity and clarity of purpose when conducting surveys to collect patient input for Health Technology Assessment (HTA) submissions.

#### ***MS Canada will not:***

- Endorse, recommend, or promote any treatment or health product
- Allow industry partners to host Advisory Boards at MS Canada events

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Examples of acceptable MS Canada industry partnership activities include, but are not limited to:

- CADTH/INESSS Patient Input and Feedback submissions
- Participation in industry hosted advisory boards related to new drug submissions.
- Participation in industry hosted advisory boards that provide strategic opportunities for MS Canada to gather and/or share information related to patient access.
- Patient Support Program information sharing via MS Canada website
- Meetings with government/government agencies to advocate for new drug submissions in collaboration with industry partners & health professionals – MS Canada role in this context is limited to providing patient feedback and advocating for access to Health Canada medications approved for MS and allied diseases.
- MS Canada participation in working groups with industry to identify areas of mutual interest and to collaborate in building solutions for the benefit of the MS community.
- Industry Engagement in MS Canada -hosted Stakeholder Roundtable opportunities to share input, perspectives, and ideas to inform MS Canada initiatives & advocacy efforts.
- Collaborating with an industry partner to share information about MS Canada programs, services, and events via their MS app to enhance reach to the MS community.

### **Patient Input**

A key priority of MS Canada is to advocate for all Canadians living with MS and allied diseases to have access to Health Canada approved therapies indicated for MS. MS Canada will, where requested, participate as a patient group voice to advocate for affordable and timely access to therapies indicated for MS and allied diseases. Opinions related to a specific therapy should be reserved for medical professionals within the MS field. The MS Society’s role is to speak on behalf of the patient voice only.

As it relates to treatment access, MS Canada will seek input from the MS community (patients) for a specific drug (branded) exclusively for Patient Input and Feedback lead by the Canadian Agency for Drug and Technologies in Health (CADTH) or Institut national d'excellence en santé et services sociaux (INESSS) to assist with a pending Health Canada new drug approval. The CADTH and INESSS

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patient input and feedback process is transparent and publicly available. Within each feedback report submitted to CADTH and INESSS, MS Canada must fulfil a conflict-of-interest statement via financial disclosure of industry sponsorship revenue.

MS Canada may receive information from a third-party or directly from an industry partner representative (such as published clinical trial findings, medical affairs power point slides, Health Canada product monograph) to assist with the development of a survey to collect patient feedback related to a new drug submission (NDS). Patient feedback accessed through MS Canada is the property of MS Canada. Patient feedback must be anonymous, and the purpose for collecting feedback must be clear to respondents prior to completing the survey.

### **Promotion of Industry Products & Services**

MS Canada will not endorse, recommend, or promote any treatment or health product.

MS Canada does not have the capacity to promote programs and services offered by industry partners except for contact information for patient support programs shared in the 'Treatments' section of MSCanada.ca and via the MS Navigator team. Please see the procedures document for details.

### **Advisory Board Involvement**

MS Canada may, where invited and appropriate, attend industry hosted advisory boards. These opportunities may range in topics from new drug submissions to gathering and/or sharing information related to patient access, but in all cases, MS Canada's role in this context is to reflect the patient voice and advocate on behalf of Canadians affected by MS and allied diseases. Industry partners may not host advisory boards at MS Canada events. MS Canada will not participate in any type of industry hosted stakeholder meeting or event in exchange for sponsorship revenue or accept any financial compensation for participation in an advisory board.

### **Executive Champion**

The Senior Vice-President, Mission is the Executive Champion of the Industry Partner Relationships Policy.

### **Related Policies, Legislation**

This policy direction, along with other MS Canada policy directions, provides the ethical framework that allows MS Canada to accept support from industry partners.

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MS Canada follows federal government legislation and regulations prohibiting direct-to-consumer advertising. MS Canada reviewed the Innovative Medicines Canada Code of Ethical Practices when developing this policy direction and considers the Code to adhere to similar principles as this policy direction.

### **Policy Review**

This policy direction is to be reviewed at a minimum every two years following approval or as directed by an unexpected or new-found situation requiring policy change.

- First approved June 13, 2014 by the Board of Directors
- Revised February 2017
- Revised, renamed May 2021

### **Definitions**

**Endorse/endorsement** – Approval or support of an activity, company, or product in a public manner.

**Executive Team** – The most senior level of staff leadership within MS Canada comprised of the President and Chief Executive Officer; Division Presidents; Senior Vice-President(s) and Vice-President(s). One person may hold more than one position. The President and Chief Executive Officer may alter the composition of the Executive Team as required from time-to-time.

**Industry partner company**– Term used to describe the overall category of companies that develop, manufacture and market prescription medication, over-the-counter medication, vitamins and supplements, medical devices or other medical products intended for use in the prevention, treatment, or cure of disease.

**Pharmaceutical company** – Entity that sells any chemical or biologic substance both prescription and non-prescription intended for use in the prevention, treatment, or cure of disease. In Canada, such substances must be approved by Health Canada before they can be sold.

**Innovative Medicines Canada** – Innovative Medicines Canada (IMC) is the national association of the research-based pharmaceutical companies in Canada. IMC and its members have set a high standard for ethical, transparent, and open practices that respect the relationships between member company employees, the

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life sciences sector, healthcare professionals and the Canadian public. All members of IMC are bound by the association's [Code of Ethical Practices](#).

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## Appendix A

### Policy in Practice

#### Section 12.0 Non-monetary partnership opportunities

##### → Examples of acceptable MS Canada industry partnership activities

##### **Participation in industry hosted advisory boards related to new drug submissions.**

E.g., Pharmaceutical company led meetings for MS Canada staff related to a new drug submission, including sharing clinical trial information and other information that assists the development of a customized patient input survey is critical for MS Canada submissions to CADTH and INESSS. MS Canada has engaged with all pharmaceutical partners in medical affairs meetings related to new drug submissions (Phase 3 Trial data shared). Non-disclosure agreements are often implemented for new drugs awaiting a Health Canada Notice of Compliance (NOC).

##### **Participation in industry hosted advisory boards that provide strategic opportunities for MS Canada to gather and/or share information related to patient access.**

MS Canada participation in Alexion Ad Board to learn about NMOSD when it was an emerging space. MS Canada shared information about services available to support the NMOSD community and an MS Canada volunteer also attended to provide input and lived experience perspective.

##### **Meetings with government/government agencies to advocate for new drug submissions in collaboration with industry partners & health professionals – MS Canada role in this context is limited to providing patient feedback and advocating for access to Health Canada medications approved for MS and allied diseases.**

Mavenclad (cladribine) manufactured by EMD Serono received Health Canada approval for treatment of MS but was initially not recommended by CADTH to be listed for public reimbursement through the provinces. MS Canada met with EMD Serono, an MS specialist, and CADTH representatives to discuss this decision. MS Canada prepared a briefing which argued CADTHs 'do not list' deciding factors from a patient group perspective and based on previous successful CADTH reimbursement recommendations for MS therapies.

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**MS Canada participation in working groups with industry to identify areas of mutual interest and to collaborate in building solutions for the benefit of the MS community.**

Strategic Pillar Working Groups with Novartis, focused on tackling 4 key objectives:

1. Leveraging the Patient Voice for Better Access
2. Deploying Solutions to Improve Gaps in Systems of Care
3. Empowering Persons with MS for Better Disease Management through Education
4. Leveraging Research for Implementation and Knowledge of Better Care

**Collaborating with an industry partner to share information about MS Canada programs, services, and events via their MS app to enhance reach to the MS community.**

- ➔ Collaboration with Biogen in May 2021 to share information about MS Awareness Month activities (Virtual Carnation Pinning & MS Walk) via Aby App messages with links to MS Canada 's website.
- ➔ Collaborated with Roche in 2018 to share MS Knowledge Network brochure via new patient welcome kits to COMPASS (Roche’s patient support program).
- ➔ Collaborated with Teva Neuroscience in 2020 to share information about the MS navigators/ MS Canada via a web banner on Shared Solutions (Teva’s patient support program).

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