Corporate Ethics Policy for Support from Organizations with Commercial Interests in Hepatitis B, 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 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, hepatitis D, or liver cancer, 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 relationships with for-profit entities. This policy does not apply to an organization that chooses to donate 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. This policy is specific to the Hepatitis B Foundation and does not extend to the Baruch S. Blumberg Institute or Pennsylvania Biotechnology Center.

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 research projects and educational programs are in the form of charitable donations or unrestricted educational grants HBF independently designs, implements, and evaluates all such projects and programs. While grantors can provide feedback, programs shall not be influenced by financial supporters.
- Funding for events is in the form of grants or sponsorships. While we welcome input from grantors and sponsors, 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, hepatitis D, 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 content. At HBF's discretion, a 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 and logo can be co-branded on an educational program only with explicit approval, and may be used in association with acknowledging support and/or sponsorship, with approval.
- 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.
    c. Presentation of scientific data or patient-facing information at HBF-hosted community-

facing events, specifically for informational/educational purposes for people impacted by hepatitis B, hepatitis D, or liver cancer; or for caregivers, high risk communities, providers, advocates, or other key stakeholders.

- 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 from HBF.
- HBF does not sell or share any internal mailing lists.

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, CEO) and/or the Board of Directors.

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 publicly discloses funding sources and potential or perceived conflicts of interest. HBF employees clearly disclose funding sources as appropriate (i.e. peer reviewed manuscripts, public/professional presentations).
- HBF will ensure that corporate partners associated with business interests in hepatitis B, hepatitis D 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 Ethics 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; and reports this publicly on the Annual Report.

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 events, including fundraising events.
- **Strategic Alliance or Partnership:** This includes ongoing, longer-term, mutually beneficial collaborative relationships between HBF and a corporation. It may not necessarily involve 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 on our website or social media, or sponsor-related materials. 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 interests, about available opportunities for participation (including clinical and public health research opportunities). 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. To ensure quality control, HBF completes an internal review of opportunities to assess for alignment with our mission and ethics policy and will make the decision to inform the community about a particular opportunity on a case-by-case basis. 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/hepatitis D/liver cancer 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 Ethics 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: This approved Corporate Ethics Policy will be provided to all corporate partners, including before contracts/MOUs are completed/signed.

Disclosure: HBF will, unless otherwise prohibited by law, disclose financial support it receives via 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.