



THE 33RD ANNUAL

SHARIGE COnference

COMPLIANCE | TRANSPARENCY | PDMA | OIG

MAY 7 - 9, 2025

PRINCETON MARRIOTT AT FORRESTAL NJ

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It's time for the 33rd Annual Sharing Conference!

We're so excited you're joining us and supporting our mission to foster education and ensure compliance among life science professionals.

Compliance: it's the recipe for success in our industry, protecting patient safety, ensuring quality products, and maintaining the integrity of our drug supply chain. But what are the crucial components of an effective compliance program? That's what we're here to discover!

We've whipped up an engaging agenda featuring expert-led presentations, discussions and interactive workshops that promise to uncover the essential ingredients for a successful compliance strategy. We'll be diving into critical topics to help you refine your compliance recipe.

We are proud to have our vendor partners with us in the Exhibit Hall and throughout the conference to discuss the many ways they can support your compliance efforts with their extraordinary services and solutions.

Thank you so much for taking the time out of your busy schedules to join us this year. Whether you're an old friend or a newcomer, we can't wait to connect with you.

Let's cook up compliance!

Deb Segura

Alliance Executive Director deb.segura@sharingalliance.org

_ Seb & Segura



Welcome!

Thanks for joining us for three days of learning, collaboration, and discovery. Your commitment to your education and personal growth plays an essential role in securing the integrity of our drug supply chain—we are glad you're here!

With the rapid pace of regulatory change, it's unclear what the future holds for our industry, making it more crucial for us to connect now than ever before.

Our goal is to help us navigate the challenges and uncertainties that lie ahead. Over the next few days, we'll exchange ideas, share insights, and engage in meaningful conversations to deepen our understanding of the issues impacting our compliance efforts.

We've worked hard to design a robust agenda featuring a variety of sessions packed with practical, relevant information. When you're not immersed in a workshop or presentation, please connect with our Vendor Partners in the Exhibit Hall to learn how they can support you with their commercial operations and compliance services and solutions.

If your schedule permits, visit us at the Sharing Alliance booth to share your thoughts and help shape future Sharing Alliance projects.

Make the most of your experience—ask questions, participate in discussions, and, most importantly, share your knowledge. Together, we can strengthen our compliance culture and face the challenges ahead. Let's get started!

Lisa A. Butler

Sharing Alliance President

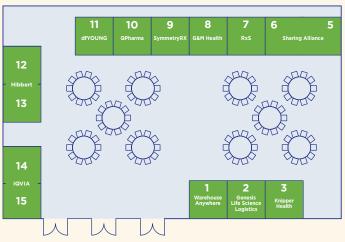
Lisa a. Butler

Director, State Licensing, DEA & PDMA Compliance

Novartis Pharmaceuticals Corporation

Exhibit Hall Layout

Alexander Ballroom



Entrance

Exhibitor	Booth
dfYOUNG	11
G&M Health	8
Genesis Life Science Logistics	2
Hibbert	12/13
IQVIA	14/15
Knipper Health	3
QPharma	10
RxS	7
Sharing Alliance	5/6
SymmetryRX	9
Warehouse Anywhere	1

Exhibit Hall Hours

Thursday 7:30am - 5:00pm Friday 7:30am - 2:00pm

(Hall closes during General Sessions)

The following section is dedicated to our vendor partners. You'll find a profile on each of the exhibitors, with contact information.

Immediately following the profiles, there are Exhibitor Category Listings that indicate the areas of specific vendor expertise.

We encourage you to use this Directory as a convenient resource when you are in need of vendor services throughout the coming year, or visit the Compliance Service & Solution Providers page at sharingalliance.org

dfYOUNG

1235 Westlakes Drive

Suite 305

Berwyn, PA 19312 Phone: 610-725-4000

Email: ashley.nielson@dfyoung.com

Contact: Ashley Nielsen | www.dfyoung.com

Booth 11 10+ years

dfYOUNG's dedicated Life Science Division is a premium high-touch service division focused on meeting our clients' varying needs and customizing business solutions in the pharmaceutical marketplace. Working alongside many of the world's largest pharmaceutical and medical device companies, we have created and optimized the way freight is picked, packed, and transported while reducing costs. Whether it's transporting medical devices or managing the logistics of drug samples, the Life Sciences Industry trusts us to handle critical shipments, averaging 99% on-time success.

G&M Health

285 Davidson Avenue Somerset, NJ 08873 Phone: 908-704-7323

Email: eendrawis@amhllc.com Website: www.amhllc.com





Booth 8 15 years

G&M Health, LLC is a life-science service company offering compliance consulting, computer validation, audits & assessments, aggregate spend services, State price transparency reporting, Hospital Credentialing, training and MLR support services. G&M was founded by recognized legal and regulatory compliance experts in the healthcare industry, who have worked with and/or advised over 100 pharmaceutical and biotech companies over the last 25 years. Our mission is to be the premier provider of innovative, auality, efficient and compliance-oriented solutions for the healthcare industry.

Genesis Life Science Logistics

200 Herrod Boulevard Dayton, NJ 08810 Phone: 866-395-1827

Fax: 609-642-1636

Email: sconn@genesislogistics.com

Contact: Steve Conn | www.genesislogistics.com



Sponsor

Booth 2 20 years

Genesis Life Science Logistics specializes in providing customized logistics services to pharmaceutical companies that ship sample prescription drugs to field sales representatives. The focus of our services is to provide a logistics package that assists our customers with maintaining the highest level of compliance to PDMA regulations; reducing costs associated with the distribution of sales samples and improving field sales productivity through efficient scheduling and a flexible shipment delivery process.

Hibbert

400 Pennington Avenue Trenton, NJ 08618 Hibbert A HISTORY OF FORWARD THINKING

Phone: 888-HIBBERT

Email: tom.moonan@hibbertgroup.com Contact: Tom Moonan | www.hibbert.com

Booth 12/13

5+ years

Hibbert has been facilitating engagement between manufacturers, providers and consumers in a multitude of industries for more than 140 years. We offer an industry-leading portfolio of integrated marketing capabilities that include Global Fulfillment, Omnichannel & Database Management and Managed & Professional Services. We specialize in providing the Pharmaceutical Industry with a variety of support including fully compliant Sample Management Direct to Physician and Direct to Representative services.

IQVIA

1100 Boulders Parkway Suite 350

Richmond, VA 23225 Phone: 804-564-2791

Email: taylor.scott@iqvia.com Contact: Taylor Scott | www.iqvia.com

Booth 14/15

■IQVIA



25+ years

IQVIA delivers integrated information, technology, and compliance solutions to drive healthcare forward. With over 79,000 employees, we harness insights, commercial and scientific depth, and executional expertise to empower clients.

IQVIA's US Regulatory Compliance business includes our Sample Accountability team founded 30+ years ago with a specific focus on supporting pharmaceutical organizations with "best in class" compliance services including samples reconciliation, inventories, signature audits, and PDMA consulting. Other core IQVIA offerings include CRM systems, data and data validation services and more.

Knipper Health

Booth 3

One Healthcare Way Lakewood, NJ 08701

Phone: 888-564-7737

Email: ejohnson@knipper.com

Contact: Eric Johnson | www.knipper.com



Conference Sponsor

25+ years

Knipper Health is a leading healthcare solutions company serving the pharmaceutical, biotechnology, and medical device industries for more than 35 years, with a focus on Sample Management and Marketing, Custom Pharmacy Solutions and 3PL services. Knipper has become the single source-provider of samples management services for many small to large pharmaceutical customers. KnippeRx is a highly nimble, independent specialty pharmacy that serves both commercial and non-commercial needs. KnippeRx helps overcome the complex barriers to patient access by providing the shortest path from initiation of a prescription to delivery of essential therapy. Knipper 3PL provides storage and distribution of CRT, Cold Chain, Frozen, and DEA III-V products along with full order to cash, chargebacks, and contract management services.

QPharma

22 South Street Morristown, NJ 07960 Phone: 973-656-0011 QPharma®

Conference Sponsor

Email: john.cunningham@qpharmacorp.com
Contact: John Cunningham | www.qpharmacorp.com

Booth 10 20+ years

QPharma, Inc., NJ-based since 1994, excels in regulatory compliance and brand support for pharmaceuticals, devices, and life sciences. Our tailored solutions amplify client sales and brand efforts. Built on compliance, our services span sample management, key opinion leader, HCP targeting, direct-to-practitioner solutions, quality and compliance management, and learning management. Our expertise, anchored in PDMA compliance and industry best practices, is powered by Titanium®, a cloud-based SaaS platform, ensuring seamless data integration. Partner with QPharma, Inc. for transformative compliance, modernization, and operational excellence.

RxS, LLC

195 Route 9 S Suite 208

Manalapan, NJ 07726 Phone: 732-851-1770 Email: sales@rxsinfo.com

Contact: Alex DiNolfi | www.rxsinfo.com



Booth 7 10+ years

RxS is a woman-owned service company enabled by technology and dedicated to empowering healthcare success. It was founded by industry leaders in sample management who recognized that existing market offerings did not provide an integrated multi-channel solution. Our team has worked on both the services and brand sides of the business, with hands-on experience providing patient care, developing innovative technologies, and managing projects in regulated industries with solutions rooted in technology and focused on compliance. We provide tools that help clients develop, launch, promote, and extend the life of their portfolios and products.

SymmetryRX



830 Montgomery Avenue #314

Bryn Mawr, PA 19010 Phone: 804-986-7791

Email: hal.walsh@symmetryrx.com

Contact: Hal Walsh | www.symmetryRX.com

Booth 9 3 years

SymmetryRX organizes its business around the drug sample experience and practice operations contributing to safe, effective, efficient and compliant healthcare. SymmetryRX continues its creation of breakthrough drug sampling technology, brand marketing, and direct-to-practice sample demand for brands. All built to ensure prescribers have the right sample for the right patient at the right time. SymmetryRX helps brands reach more prescribers, deliver samples more efficiently, and drive better compliance - while enabling prescribers to improve patient care.

Warehouse Anywhere



onference

Sponsor

8 Los Robles Street Williamsville, NY 14221 Phone: 716-380-0025

Fax: 716-929-9055
Email: aullrich@wasolutions.com

Contact: Alex Ullrich I www.wasolutions.com

Booth 1 10+ years

Warehouse Anywhere is the premier provider for self storage national account services. With over 10,000 available locations, Warehouse Anywhere is a single source provider to manage all storage assets throughout the United States. Additional services include inventory management, last mile delivery, warehousing and distribution.

Our Exhibiting Vendor
Partners generously
demonstrate their
products and services at
the Sharing Conference
to offer Alliance
Members a wide array of
compliance solutions.

We hope you will use the category listings that follow when searching for a vendor with a specific area of expertise both during the conference and throughout the year.

Address Verifications

Hibbert

IQVIA

Knipper Health

QPharma

Aggregate Spend Services

IQVIA

QPharma

Alternative Sampling Systems

Hibbert

Knipper Health

QPharma

RxS, LLC

SymmetryRX

Call Center Services

Hibbert

IQVIA

Knipper Health

QPharma

RxS, LLC

SymmetryRX

Card Programs

IQVIA

SymmetryRX

Cold Chain

dfYOUNG

Genesis Life Science Logistics

Hibbert

Knipper Health

QPharma

Compliance Auditing

G&M Health

Hibbert

IQVIA

Knipper Health

Compliance Certification/Education

G&M Health

AIVQI

Knipper Health

QPharma

RxS, LLC

Compliance Consulting

G&M Health

IQVIA

QPharma

RxS, LLC

Computer System Validation

G&M Health

IQVIA

QPharma

Corporate Integrity Agreement (CIA) Oversight

IQVIA

QPharma

Credentialing/Hospital Credentialing

G&M Health

QPharma

Customer Relationship Management

Hibbert

IQVIA

Database Products

Hibbert

Data Capture Services

Hibbert

RxS, LLC

SymmetryRX

Data Integration, Analysis, Reporting and Consulting

Hibbert

IQVIA

QPharma

RxS, LLC

SymmetryRX

Direct Mail

Hibbert

Knipper Health

SymmetryRX

Direct to Patient Sampling

Hibbert

Knipper Health

QPharma

RxS, LLC

Direct to Practitioner Sampling

Hibbert

Knipper Health

QPharma

RxS, LLC

SymmetryRX

eSignature & Faxback Order Capture Services

Hibbert

Knipper Health

QPharma

RxS, LLC

SymmetryRX

Expense Management & CRM HCP Data Integration

IQVIA

Federal Sample Transparency Reporting

G&M Health

IQVIA

Knipper Health

QPharma

RxS, LLC

Federal/State Compliance Library

G&M Health

IQVIA

Forms/Printing/Offset & Digital Print

Hibbert

Knipper Health

RxS, LLC

General Consulting

G&M Health

Genesis Life Science Logistics

Hibbert

IQVIA

RxS, LLC

HCP Targeting

Hibbert

Knipper Health

QPharma

RxS, LLC

SymmetryRX

Help Desk/Technical Support

IQVIA

Knipper Health

QPharma

RxS, LLC

SymmetryRX

Inspections (Closeouts, Initial, Random Inventory and For Cause Audit)

Hibbert

IQVIA

Knipper Health

QPharma

RxS, LLC

Inventory Services

Hibbert

AIVOI

Knipper Health

QPharma

RxS, LLC

Warehouse Anywhere

Key Opinion Leader Influence Mapping

QPharma

Kitting

dfYOUNG

Genesis Life Science Logistics

Hibbert

Knipper Health

QPharma

Literature Fulfillment

dfYOUNG

Genesis Life Science Logistics

Hibbert

Knipper Health

QPharma

RxS. LLC

Logistics & Fulfillment

dfYOUNG

Genesis Life Science Logistics

Hibbert

Knipper Health

QPharma

Warehouse Anywhere

Mail Order/Specialty Pharmacy

Knipper Health

QPharma

Marketing Solutions & Consulting

Hibbert

SymmetryRX

Patient Assistance Programs

Hibbert

Knipper Health

QPharma

Prescriber Validation

Hibbert

IQVIA

Knipper Health

QPharma

Product Launch Support

dfYOUNG

Genesis Life Science Logistics

Hibbert

IQVIA

Knipper Health

QPharma

RxS, LLC

SymmetryRX

Reimbursement Hub Services

Knipper Health

Returns Processing

dfYOUNG

Genesis Life Science Logistics

Hibbert

Knipper Health

QPharma

RxS, LLC

Sales Force Automation

Hibbert

IQVIA

RxS, LLC

Sales Rep Distribution

dfYOUNG

Genesis Life Science Logistics

Hibbert

Knipper Health

QPharma

RxS, LLC

Sample Access Portal (Coupon, Voucher, Co-pay Card)

Hibbert

IQVIA

Knipper Health

QPharma

RxS, LLC

SymmetryRX

Sample Accountability Services

Hibbert

IQVIA

Knipper Health

QPharma

RxS. LLC

Sample Accountability Systems

IQVIA

Knipper Health

QPharma

RxS, LLC

Samples IT Solutions

Hibbert

IQVIA

QPharma

RxS, LLC

Shipping & Transportation

dfYOUNG

Genesis Life Science Logistics

Hibbert

Knipper Health

QPharma

Software Development & Consulting

RxS, LLC

SymmetryRX

Software/Process Validation Services

G&M Health

IQVIA

State Law Reporting Services

G&M Health

IQVIA

Knipper Health

State License Data

IQVIA

Knipper Health

QPharma

Storage/Self Storage

dfYOUNG

Knipper Health

Warehouse Anywhere

Trade Show Services

Genesis Life Science Logistics

Hibbert

Knipper Health

QPharma

Training Development & Execution

G&M Health

IQVIA

QPharma

Website/Portal Services

Hibbert

IQVIA

QPharma

RxS, LLC

SymmetryRX

Web Services

Hibbert

RxS, LLC

SymmetryRX

Our vendor partners have an important role in helping us to achieve our Sharing Alliance Mission. Please use this Conference Directory as a resource when you are seeking services and solutions.





















Industry Attendees, we have GREAT PRIZES for you in our Exhibit Hall!

Here's an opportunity to win a quality gift while supporting our vendor partners in the process.

Their products and services were designed with you in mind, so stop by and see what they have to offer and maybe you'll win a prize, too.

Not sure how it works?

Need an entry form?

Stop by the Alliance Booth
or Conference Registration desk
for more information.

Names of raffle winners will be randomly drawn during the extended Lunch on Friday, 12:00-2:00pm.

Raffle is open to biotech, pharmaceutical, and medical device manufacturer industry registered attendees only, not their guests. Vendors are not eligible to win prizes. Booths must be visited and initialed in order to be eligible for the prize drawing.

Winners must be present to win. Some prizes may be shipped to the winner after the Conference has concluded. Only one entry form per person may be submitted.

Special thanks to all our vendors who have generously donated to participate in this raffle!

2025 Conference Sponsors





















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Sharing Alliance Board

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Lisa A. Butler, Alliance President Novartis Pharmaceuticals Corporation

Debbie Tay, Alliance Vice President and Secretary Teva Pharmaceuticals

Alan G. Minsk, Alliance Legal Counsel Partner Arnall Golden Gregory LLP

Mark Adams, Alliance Senior Advisor

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Yvette Gaines, GlaxoSmithKline

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Jennifer Kretsch, Gilead Sciences, Inc.

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Dave Wilson, Knipper Health

Alliance Vendor Consultant Board Member

Judy Fox, QPharma, Inc.

Alliance and Conference Support Board Members

Paul Delfino

Christine Delfino Seneca

Delfino Marketing Communications, Inc. Alliance and Conference Marketing and Communications



membership@sharingalliance.org

Acknowledgments

We are incredibly grateful for your support of our Sharing Alliance Mission. The invaluable insights you bring enrich our event and enable us to create a meaninaful and positive impact on compliance within our industry.

A special thank you to our remarkable Keynote Speaker **Chuck Gallagher**

> Our sincere thank you to our panelists for their exceptional contributions

> > **CMS Town Hall**

The CMS Open Payments Team Moderated by Judy Fox

Compliance Officer Town Hall

Steve Cohen **Emily Gunner** Rafael Gonzalez

Facilitated by Lisa Butler

Faiza Poshni

We deeply appreciate the time and effort dedicated by our workshop presenters.

Eric Ciaverelli John Gilbert

Crissy Corbin Brad King

Jennifer Kretsch **Alison Crawley**

Marc Lavin Jon Dellaquila

Don DeSmet Agron Michael Lehikoinen

Stacy Diefenbach **Bob Melillo**

Sarah diFrancesca Alan Minsk

Chris Dotta Bill Samuelson

Tracey Fama MaryLou Schoonover

Teresa Farmer **Debbie Tay**

Chuck Gallagher Jessica Youngs

Thank you for sharing your expertise with us!

And finally, I would personally like to extend a heartfelt thank you to all our industry attendees and vendor partners for joining us this year. Your participation and commitment to the greater good is inspiring!

> Deb Segura Alliance Executive Director

The Sharing Conference is Unique

We're thrilled to have you with us! As you experience all we have to offer, you'll notice a number of things that make the Sharing Conference a one-of-a-kind event.

By the Industry, For the Industry

The Sharing Conference is nothing like a traditional conference or trade show. The entire event is designed by your colleagues – pharma and med device industry compliance professionals – who understand what the important issues are and what information you need to know to succeed. The Sharing Conference is operated and managed by pharma industry Board Members of the Sharing Alliance, a not for profit organization, and every single dollar earned is reinvested into the Conference and Alliance Membership. Our mission is simple: to improve the industry's understanding of and compliance with government regulations.

A 30+ Year Legacy of Educational Excellence

We are the original pharmaceutical sample compliance event. Since its inception in response to the complexities of compliance with the PDMA, the Sharing Conference has been the premier event for industry people who are responsible for regulatory compliance. Over the years, our content has expanded into other compliance areas including Open Payments, OIG Guidance, DQSA, DEA Compliance, CIAs and more. Our only motivation is to help guide industry along the road to compliance.

You're Not Just an Attendee, You're an Alliance Member

When you come to the Sharing Conference you are automatically enrolled as Members in The Alliance for the following year. As a Member, you will receive ongoing communications on important regulatory news and "Industry Insights" from our Board. This valuable content is supplemented by the Members Only section of our website, which is a one-stop resource featuring Federal and State Compliance News, an aggregation of important news from around the internet, current and past conference presentations, an archive of all Industry Insights, and much more.

And Remember...THERE'S A ROLE FOR YOU!

While you're here to learn, you most likely have some expertise – or even just an opinion – that has value to other members. And we have a number of ways for you to contribute. We are always on the lookout for new Board Members, speakers, presenters, and anyone willing to volunteer their time or contribute content. We recognize that you also have a full time job so we've come up with a number of different participation options. Stop by the registration desk or ask a Board Member to learn more.

Industry Acronyms

4 EDC	
	Adverse Event Reporting System
	American Medical Association
	Abbreviated New Drug Application
	Acknowledgment of Content
	Acknowledgment of Delivery
	American Pharmaceutical Association
BIO	Biotech Industry Association
CAPA	Corrective and Preventative Action
CDC	Center for Disease Control
CBER	FDA Center for Biologics Evaluation and Research
CDER	FDA Center for Drug Evaluation & Research
CDRH	Center for Devices and Radiological Health
CIA	Corporate Integrity Agreement
CFR	Code of Federal Regulations
CLM	Closed Loop Marketing
CMS	Center for Medicare & Medicaid Services
CPGM	Compliance Program Guidance Manual
CRM	Customer Relationship Management
CSA	Controlled Substances Act
C\$O	Consumer Safety Officer
DEA CSA	Drug Enforcement Administration Controlled Substance Act
DPI	Drug Process Inspections
DSCSA	Drug Supply Chain Security Act
	Division of Small Manufacturers Association
DTP	Direct to Practitioner
DTPt	Direct to Patient
	Drug Quality & Security Act
	Establishment Inspection Report
	European Agency for the Evaluation of Medicinal Products
	Federal Drug Administration Modernization Act
	Food & Drug Administration Safety & Innovation Act
	Fair Packaging and Labeling Act
	Good Clinical Practices
	Good Laboratory Practices
	Current Good Manufacturing Practices
	Hazard Analysis and Critical Control Points
	Hazard Analysis and Risk-Based Preventative Controls
	Health Care Officer; Health Care Organization
	Health Care Provider; Health Care Practitioner
	U.S. Department of Health and Human Services
HIMA	Health Industry Manufacturers Association
	Health Insurance Portability & Accountability Act

Industry Acronyms

HLOGA	Honest Leadership and Open Government Act
IDB	Investigational Drug Branch; Investigator's Drug Brochure
IDE	Investigational Device Exemption
IND	Investigational New Drug
IREC	Independent Research Ethics Committee
LMS	Learning Management System
MDA92	Medical Devices Amendments of 1992
MDMA	Medical Device Manufacturer's Association
MDR	Medical Device Reporting
MHRA	Medicines and Healthcare Product Regulatory Agency
MREC	Medical Research and Ethics Committee
NAFL	Notice of Adverse Findings Letter
NAI	No Action Indicated (non support of regulatory action)
NCE	New Chemical Entity
NDA	New Drug Application
NPI	National Provider Identifier
NPPS	National Plan and Provider Enumeration System
OCI	FDA Office of Criminal Investigations
OECD	Organization for Economic Cooperation and Development
OIG	HHS Office of Inspector General
OMB	Office of Management and Budget
OOPD	FDA Office of Orphan Products Development
ORA	FDA Office of Regulatory Affairs
PCCR	Pharmaceutical Corporate Compliance Reporting
PCI DSS	Payment Card Industry Data Security Standard
PDA	Prescription Drug Amendment
PDMA	Prescription Drug Marketing Act
PhRMA	Pharmaceutical Research and Manufacturers Association
PTO	Patent and Trademark Office
PPACA	Patient Protection and Affordable Care Act
SAE	Serious Adverse Event
SAMHSA	Substance Abuse and Mental Health Services Administration
SAMM	Safety Assessment of Marketed Medicines
SCORM	Shareable Content Object Reference Model; Shareable Content Reusability Model
SFA	Sales Force Automation
SMDA	Safe Medical Devices Act
SLN	State License Number
SOM	System Object Model
SPNN	Specialty Pharmacy Nursing Network
USC	United States Code
VAWD	Verified Accredited Wholesale Distributor

Antitrust Policy

The Sharing Alliance™ has throughout its existence followed a rigorous program of compliance with the Sherman Act and other antitrust statutes. This Policy statement provides a reference for members of the Sharing Alliance and others who attend Sharing Alliance functions. All who attend Sharing Alliance meetings should read and understand this statement.

Adherence to the guidelines below will avoid potential violations by individuals, member firms, and the Sharing Alliance itself. Violations of the Sherman Act and other antitrust statutes can constitute a felony punishable by imprisonment and fines. In addition, private antitrust lawsuits (which may include class actions) are both expensive to defend and can subject defendants to treble damages. The Federal Trade Commission also has jurisdiction over anticompetitive practices of non-profit trade associations whose activities provide substantial economic benefit to their for-profit members.

Trade associations, which by their very nature involve a combination of, and interaction among, competitors are subject to close antitrust scrutiny and therefore must be careful to keep their activities within the prescribed bounds both in appearance and in actual fact. The Sharing Alliance is committed to full compliance with antitrust laws. The guidelines set forth below have been prepared to assist the Sharing Alliance and its members in assuring their conduct is permissible under the law.

THE POLICY

Any agreement as to price among competitors is a violation of the Sherman Act, regardless of the reasonableness of the price set or whether the agreement is to raise, lower, peg, or stabilize price levels. It follows that any discussion of price or price levels at Sharing Alliance meetings is not permitted. This includes any discussion of prices of products, supplies, or service. Similarly, there must be no discussion of any elements of company operations which might influence price such as: company costs of operations, supplies, or services; allowances or discounts; terms of sale; margins; plans of individual companies concerning production, distribution or marketing of particular products; or changes in industry production, capacity or inventories, except historical data. Any agreement not to compete among business firms also violates the antitrust laws. Accordingly, no discussion of division or territories or customers, or limitation on nature of business, may be held at any Sharing Alliance function. Joint refusals to deal (boycotts) are likewise unlawful, and no discussions related to this practice are permitted. Included within this prohibition are any discussions of black lists and any unfavorable reports involving particular suppliers.

CHECKLISTS

All members and other attendees of the Sharing Alliance must follow these checklists to ensure adherence to the Sharing Alliance Antitrust Policy and relevant antitrust laws:

DO NOT

At any meeting or social gathering incidental to such meeting, whether seriously or in jest, discuss or exchange information regarding the following subjects:

- 1. A member company's prices (present or future), pricing patterns or policies, price differentials, charges or other terms and conditions of sale (e.g., transportation rates or policies, discounts, allowances, mark-ups or credit terms), including any attempt to bring about any understanding or agreement with respect to any of those subjects.
- 2. A member company's costs, production, markets, capacity, inventory, sales or plans regarding the design, production, distribution, promotion or marketing of specific products (including possible customers or sales territories) or other competitively sensitive information.

Antitrust Policy

- 3. Except to the extent necessary to further legitimate objectives and pursuant to a program approved by counsel, general industry pricing policies or patterns, price levels, price differentials or similar matters, or industry production, capacity of inventories (including planned or anticipated changes therein); or other market data.
- 4. Bids or contracts for particular products and customers, bidding procedures, or other company-specific sales or marketing activities.
- 5. Territorial restrictions, allocations of customers, restrictions on types of products or any other kind of market division.
- 6. Matters relating to actual or potential customers or supplies that might have the effect of excluding them from any market or influencing the business conduct of any company towards such customers or suppliers, including the use of the association to bring market dissidents into line or to penalize non-participants in the group.
- 7. Any other competitive business decisions or actions of individual member companies.

DO

- 1. Make membership in the association readily available to all eligible firms.
- Prepare a specific agenda for each meeting and distribute it to all members prior to each meeting.
- 3. To the extent possible, limit discussion at meetings to the agenda items.
- 4. Open each meeting with an antitrust reminder.
- 5. Have minutes taken at each meeting, which accurately reflect what transpired including the fact that the antitrust reminder was given and promptly distribute the minutes to all members.
- Have outside counsel present at all meetings at which matters bearing on competitive relations between or among members or other sensitive information may be discussed.
- 7. Confine all discussion or business affairs to the formal meetings, rather than engaging in "rump" or splinter sessions before or after scheduled meetings.
- 8. Consult with outside counsel on all antitrust questions relating to the association's activities, regardless of whether company counsel is consulted.
- Keep strictly confidential all individual member information regarding production, sales, or product uses, which are utilized in computing dues or compiling statistical data.
- 10. Protest and disassociate yourself from any discussions or activities, which appear to violate the checklist and leave the meeting if they continue.
- 11. Report any questionable conduct involving potential antitrust violations or violations of these guidelines to counsel for further investigation.
- 12. Keep a copy of these guidelines as a reference and bring it to all meetings. Also make copies available to anyone who becomes involved in the association's activities and urge them to read and follow it.

The Sharing Alliance™ is dedicated to educating its members on the regulations and best practices that help ensure a safe and secure supply chain for pharmaceuticals and medical devices.



membership@sharingalliance.org sharingalliance.org