



EUROPEAN COORDINATION COMMITTEE OF THE RADIOLOGICAL, ELECTROMEDICAL AND HEALTHCARE IT
INDUSTRY

DOs

DO ADHERE TO THE 4 BASIC PRINCIPLES OF COCIR'S CODE OF CONDUCT:

SEPARATION BETWEEN BENEFITS AND DECISION-MAKING
PROPORTIONALITY OF REMUNERATION FOR SERVICES PROVIDED
TRANSPARENCY IN THE MANAGEMENT OF HCPS
DOCUMENTATION OF BENEFITS PROVIDED

MEETINGS, HOSPITALITY & CONFERENCES

Ensure a legitimate reason for the meeting and appropriateness of location
Reimburse reasonable travel and lodging expenses only
Ensure hospitality related to a meeting is subordinate in time and focus
Limit meetings and related hospitality strictly to persons having a professional interest in the meeting
Contribute financial grants to conferences for scientific or educational activities only to conference organizer, be transparent with respect to the support provided

CONSULTANCY & RESEARCH AGREEMENTS

Ensure a legitimate need for the contracted services based on the HCP's qualifications and expertise
Specify services and deliverables in a signed contract
Document approval of HCP's institution
Compensate consultancy at fair market value

**DEMONSTRATION & EVALUATION
EQUIPMENT**

Offer equipment for demonstration/evaluation only for a reasonable period, usually less than 6 months
Get approval from the HCP's institution

GIFTS & CHARITABLE DONATIONS

Discourage gifts
Restrict yourself to occasional gifts of modest value
Donate only for a charitable purpose to a charitable organization
Ensure through your internal evaluation process that donations are not linked to past, present or future business transactions

PUBLIC PROCUREMENT

Allow Contracting Authorities to formulate open and objective technical specifications without interference
Recognize that Contracting Authorities have only limited possibilities to exempt themselves from public tendering procedures
Respect the principle of equal treatment of bidders when acting as an independent consultant for a Contracting Authority
Recognize that Contracting Authorities have limited possibilities to make changes to tender documents or scope of supply

INDEPENDENT THIRD PARTIES (ITPs)

Select ITPs that are committed to act with integrity and comply with the law
Conduct due diligence on proposed ITPs
Impose obligations in contracts with ITPs to comply with anti-bribery laws and the COCIR Code
Monitor and control ITPs

EDUCATIONAL GRANTS

Make grants only to advance genuine medical, clinical or technological education or to educate patients or the public about important healthcare topics
Allow grant recipient to independently control program content, faculty, educational methods, materials and scholarship awards
Ensure grants are not contingent upon past, present or future sales

Please refer to the relevant Q&As for interpretive guidance. Seek advice or report concerns to the COCIR Code of Conduct Committee.



DON'Ts

DO NOT NEGLECT THE 4 BASIC PRINCIPLES OF COCIR'S CODE OF CONDUCT

GIFTS & CHARITABLE DONATIONS

Treat HCPs with multiple or excessive gifts
Give cash or cash equivalents
Donate for non-charitable causes or to non-charitable organizations
Donate with the intent to influence a business transaction
Conceal your donation from the HCP's institution

DEMONSTRATION & EVALUATION EQUIPMENT

Loan equipment without a proper reason nor for a period exceeding 6 months
Conceal the loan from the HCP's institution

MEETINGS, HOSPITALITY & CONFERENCES

Invite to meetings in inappropriate locations
Contribute to conferences with no apparent scientific or educational content or value
Treat the HCP in a lavish way
Arrange for hospitality which is excessive in relation to the meeting
Extend invitations to others in addition to the HCP (e.g. spouses)
Conceal your contribution from the HCP's institution

INDEPENDENT THIRD PARTIES (ITPs)

Fail to conduct due diligence on proposed ITPs
Fail to monitor and train ITPs

CONSULTANCY & RESEARCH AGREEMENTS

Engage HCPs without a legitimate need, without consideration of their capabilities and without evaluating their scientific contribution
Link research funding with sales of members' products (unless product is specifically for use in research or linked by tender)
Keep deliverables and timelines unclear
Conceal the agreement from the HCP's institution
Fix compensation without consideration of the fair market value

EDUCATIONAL GRANTS

Make grants to individual HCPs
Use grants to directly fund endowments of professors, chairpersons of departments or other similar position, nor replace departmental budgets

PUBLIC PROCUREMENT

Unduly influence technical specifications
Offer, directly or indirectly, gifts or other benefits in order to improperly influence HCPs in the public tendering process
Encourage Contracting Authorities to unduly seek exemptions from public tendering procedures

Please refer to the relevant Q&As for interpretive guidance. Seek advice or report concerns to the COCIR Code of Conduct Committee.