



## COLORECTAL CANCER RESOURCE & ACTION NETWORK (CCRAN) CODE OF CONDUCT GOVERNING INTERACTIONS WITH INDUSTRY

The **Colorectal Cancer Resource & Action Network (herein CCRAN)** Code of Conduct Governing Interactions with Industry (the Code) is a policy adopted by CCRAN – (the Association) - regarding financial and other contractual relationships with commercial entities. This Code, which is intended to minimize the impact of real, potential, or perceived conflicts of interest that may arise when the Association, and/or its members accept financial or other in-kind support from a company. The Code is based on the understanding that we are all responsible for conducting ourselves ethically and in compliance with the law.

### DEFINITIONS

The following definitions apply to terms used:

- **Association:** Association refers to CCRAN. It includes its Board members and Committee Chairs when acting on behalf of CCRAN, and its authorized agents.
- **Company:** refers to a commercial entity providing, or seeking to provide funding or other services to CCRAN. This definition includes agents of the company.
- **Funding:** refers to any of the five categories of financial support outlined under the Policies section.

### GUIDING PRINCIPLES

CCRAN's Code of Conduct Governing Interactions with Industry is based on the following guiding principles:

- **Patient Interests:** All activities of the Association are conducted in accordance with the best interests of patients.
- **Integrity and Scrutiny:** The Association shall perform its duties in a manner that withstands public scrutiny.
- **Respect:** The Association respects the stakeholder relations policies of a company with which it is involved.
- **Impartiality and Transparency:** The Association ensures it is impartial and objective and

that corporate funding decisions are made based on merit. The Association is as open as possible about all actions that it takes and advice that it provides.

- **Accountability:** The Association accepts accountability for its compliance with the Code and ensures that any company with which it is involved is familiar with the Code.

## Policies

Conflicts of interest may arise in a mutual relationship where one party has the capacity to exert undue influence over another. The following policies have been developed to ensure that relationships of the Association and its corporate funders are ethical, transparent and reflect positively on both the Association and funders.

## 1. FUNDING: CATEGORIES

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Five funding categories are included in the Code:

**1.1 Project funding** – where the Association establishes a collaboration with a company to undertake a project relating to an issue of mutual interest, the following will apply:

- The Association maintains editorial control over all materials produced in connection with the project.
- The sponsor will be acknowledged, in accordance with their policies and governed by the Association's policies.
- The Association will not endorse or promote individual products or services.
- The Association and the company may both benefit from the relationship.

**1.2 Sponsorship** – where a company funds a single activity such as an external meeting or newsletter, the following will apply:

- The company is not involved in the design and planning for the activity for which the sponsorship is granted.
- The Association maintains editorial control over all materials or meeting programs and has sole discretion on the meeting attendees.
- The Association will not endorse or promote the company's products or services.
- The sponsor will be acknowledged, in accordance with the Association's transparency principles.
- The Association and the company may both benefit from the relationship.

**1.3 Unrestricted grants** are defined where all the following apply:

- The company is not involved in the project for which the grant is used.
- The grant will be acknowledged; however, the company's logo is not used.
- The Association controls the wording and position of the acknowledgment.

**1.4 Financial donations and in-kind support** may be offered to the Association.

- In this case the Association will acknowledge the name of the corporate donor on its website and/or annual report if the amount of support is greater than 10 percent of the Association's total annual revenues. The monetary value of in-kind support over \$1,000 should be included in the total amount of the support.

**1.5 Support of research activities**

- Financial support for research projects may be provided by a company for administration by the Association. This may take the form of an unrestricted grant or project funding and the respective policies apply to each form of support.
- The company may not have representation on the project steering committee, and the Association maintains control over the choice of research Association, study design and publication of results.
- The sponsor(s) of any research activities will be acknowledged at the presentation and publication of results.

## **2. POLICIES FOR THE ASSOCIATION**

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The Association adheres to the following policies when accepting project funding, sponsorship, grants or donations from companies:

**2.1** Before accepting funding from a company, the Association's board or executive must conduct due diligence to satisfy itself that:

- There is strong reason to believe that the donation, grant or sponsorship will result in benefit to the Association and to the patients and caregivers it serves.
- The company's type of business, its corporate governance policies and its reputation in working with the Association and do not present any cause for concern.

- The Association will not knowingly accept any type of funding from a company that primarily produces or primarily sells commercial tobacco products or primarily receives funding from their sales.

## **2.2 The Association will maintain its independence of action**

- *The content of communications originating from the Association, such as patient submissions for drug reviews, policy submissions, information for patients, caregivers and the public, newsletters and presentations must be developed entirely by the Association.*
- Submissions for drug reviews or policy recommendations will not be shared or reviewed with sponsors in advance.
- The Association will not endorse or promote individual products or services by brand name. Advocacy activities, such as making patient submissions for drug reviews or petitioning governments to fund a therapy, are not considered promotion because these activities are intended to improve access to the therapy, rather than recommend that it be prescribed. Similarly, providing educational information on available therapy options is not considered promotion.

## **2.3 The Association will maintain mutually respectful and transparent relations.**

- The Association will sign a written agreement with all companies outlining each partner's contribution and responsibilities. The company and the Association must agree to abide by each other's codes of conduct.
- A company's support will be acknowledged transparently and appropriately.

## **2.4 The Association will proactively limit influence.**

- The Association where possible should seek a diversity of funding sources and should not allow any one corporate sponsor to contribute more than 50 per cent of the Association's or the company's total revenues for the year, including the value of in-kind services.

## **3. POLICIES FOR COMPANIES**

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The Association will not embark upon or continue with any sponsorship, grant making or collaborative venture that might damage its reputation or result in the dissemination of biased and inaccurate information. Therefore, when working with the Association, companies are expected to adhere to the following guidelines:



**3.1** The Association must be consulted whenever and wherever its name is used. Approval must be sought, in writing, for any copy produced which refers to an initiative of the Association that is supported by the company.

**3.2** At no time can the Association's logo be used without express written permission.

**3.3** At no time can press releases be issued which refer to the Association without the Association's prior written approval. Likewise, suggested quotes can be prepared but must always be agreed to, in writing, by the Association.

**3.4** The Association retains a veto over all materials produced in connection with an initiative.