

## The Pharmaceutical Supply Chain Initiative

# Competition and Anti-trust statement

Date: 01 July 2025

### English version

While some activities among competitors are both legal and beneficial to the industry, group activities of competitors are inherently suspect under the antitrust & competition laws of the US, UK and other countries in which our companies do business. Agreements between or among competitors need not be formal to raise questions under antitrust laws, but may include any kind of understanding – formal or informal, secretive or public – under which each of the participants can reasonably expect that another will follow a particular course of action or conduct. Each of the participants in this meeting is responsible for seeing that topics which may give rise to an appearance of an agreement that would violate the antitrust laws are not discussed. It is the responsibility of each participant in the first instance to avoid raising improper subjects for discussion, such as those identified below.

Topics of discussion that should be specifically avoided are:

- price fixing.
- discounts; rebates, pricing policies or terms, levels of production or sales, supply or demand data, and marketing terms customer and territorial allocation.
- standards setting (when its purpose or effect is to limit the availability and selection of products, limit competition, restrict entry into an industry, inhibit innovation or inhibit the ability of competitors to compete).
- codes of ethics administered in a way that could inhibit or restrict competition.
- group boycotts or other exclusionary practices.
- validity of patents.
- on-going litigation.
- specific R&D, sales or marketing activities or plans, or confidential product, product development, production or testing strategies or other proprietary knowledge or information.

It is the sole purpose of PSCI meetings to provide a forum for expression of various points of view on topics described in the agenda and participants should adhere to that agenda. Under no circumstances shall any PSCI meeting be used as a means for competing companies to reach any understanding, expressed or implied, which tends to restrict competition, or in any way to impair the ability of members to exercise independent business judgment regarding matters affecting competition.

## Chinese version

尽管竞争对手之间的部分合作活动在法律允许的范围内，且对行业发展具有积极意义，但根据美国、英国及本公司业务所在其他国家/地区的反垄断与竞争法律，竞争对手之间的集体行为天然带有法律风险。根据相关法律规定，竞争对手之间的协议不必具备正式书面形式，只要存在某种默契或共识——无论是正式还是非正式、公开还是私下的——只要参与方可以合理预期其他方将会采取某一特定行为或做法，即可能引发反垄断法律问题。

与会的每一位代表都有责任确保不会在会议中讨论可能被视为违反反垄断法律、或形成违法合意的议题。首先，每位参与者应主动避免引入不当话题，比如下文提及的话题。

以下内容特别应当避免讨论：

- 固定价格。
- 折扣、返利、价格政策或条款、产销量水平、供需数据、营销条款、客户或地区划分。
- 标准制定（若其目的或效果为限制产品供应或选择、限制竞争、限制行业准入、抑制创新或妨碍其他竞争者竞争能力）。
- 以限制竞争为目的或具有排他性效果的行业道德规范。
- 集体抵制或其他排他性做法。
- 专利有效性问题。
- 正在进行中的诉讼。
- 具体的研发、销售或市场计划，或涉及产品、产品开发、生产、测试等方面的机密策略或专有信息。

PSCI 会议的唯一目的是就议程所列事项提供一个多元观点的交流平台，所有与会人员均应严格遵循会议议程。在任何情况下，PSCI 会议不得被用于使竞争企业达成任何形式的共识或默契——无论是明示的还是暗示的——以限制市场竞争，或在任何方面削弱成员在涉及竞争事务上的独立商业判断能力。