

American College of Neuropsychopharmacology (ACNP)
Code of Conduct for Supporting Corporations and Corporate Representatives
April 4, 2006

The American College of Neuropsychopharmacology (ACNP) Council endorses the following Code of Conduct for its supporting corporations and their designated representatives. The ACNP Council insists that supporting corporations and their designated representatives abide by the Principles of Professional Conduct as approved by Council in February 2000. In addition, Council believes that Supporting Corporations and their representatives to the ACNP should also maintain the highest ethical standards in relationship to the areas of conflict of interest, anti-trust, proprietary information, anti-kickback, compliance with public clinical registries, and participation in the ACNP Annual Meeting.

I. Conflict of Interest

The primary mission of the ACNP is to advance scientific knowledge and to permit exchange of this knowledge untainted by commercial motives. ACNP Supporting Corporations and their employees, whether they are ACNP members or Corporate Representatives, must commit to supporting the ACNP mission free of commercial bias. The ACNP expects that:

1. If an ACNP member employed by a Supporting Corporation or a Corporate Representative is in a position to participate in ACNP scientific discussions that have implications for the commercial interests of his or her employer, the ACNP member (or corporate representative) should either:
 - a. Not participate in those discussions if he or she cannot provide independent and unbiased scientific contributions to the issue; or
 - b. If the member believes that he or she can provide independent and unbiased scientific contributions to the issue, she or he should fully disclose the existence of the potential conflict of interest.
2. Disclosure of potential conflict of interest should be made not only to other ACNP collaborators, but also to the public as a part of any communication or publication of the collaboration.
3. Members or representatives from Supporting Corporations will at all times act to avoid the appearance of impropriety, even when the ACNP Supporting Corporation Representative (or member employed by the corporation) believes there is no potential for a conflict of interest. These situations must be taken seriously, and the above two options should be considered in each instance.
4. Disclosure of possible conflicts of interest for articles should be included in the transmittal letter at the time the article is submitted. For presentations, potential conflicts of interest should be specified by the presenter. All presentations given by ACNP members and Supporting Corporations must disclose any pharmaceutical grant support

and whether or not there has been any offer or acceptance of an honoraria or consulting fee.

5. Any and all relationships that may be perceived as a conflict of interest must be transparent to the public.

II. Anti-Trust Issues

Participation in ACNP Annual Meetings by employees of Supporting Corporations may involve interaction with individuals from competitor companies on scientific matters. Given that scientific discussions could impact commercial or marketing issues, these individuals should be familiar with applicable anti-trust regulations and should avoid discussions that could result in anti-trust violations.

III. Proprietary Information

ACNP fosters the exchange of scientific information among its members and meeting attendees. However, there are limitations on information that can be shared by employees of Supporting Corporations. Employees of a company with commercial interests (whether ACNP members or Corporate Representatives) are obligated to keep proprietary company information (e.g., undisclosed research data; development plans; trade secrets) confidential.

IV. Payments to ACNP and its Members

Supporting Corporations often provide grants to the ACNP, or may provide a grant to a scientist who is an ACNP member. It must be clear and documented that such grants are unencumbered of obligation to the sponsor, support legitimate scientific or educational purposes, are based on objective criteria, and do not represent payment for influence or favorable treatment of the Supporting Corporation or its products. Any and all payments, reimbursements and other financial arrangements between an ACNP Supporting Corporate Representative and ACNP must be documented and approved by the Representative's employer and the ACNP.

V. Clinical Registries and Disclosure of Data in a Timely Manner

ACNP expects its Supporting Corporations to remain in compliance with the highest ethical standards regarding the evolving issue of making clinical trial information publicly available. ACNP Supporting Corporations are expected to comply with ACNP guidelines on the registration and reporting of the results of clinical trials.

VI. Participation in the ACNP Annual Meeting

1. ACNP Supporting Corporations are encouraged to participate in the ACNP Annual Meeting by sending employee scientists to the meeting, who may propose and/or participate in panel sessions or plenary sessions approved by the ACNP Program Committee.
2. ACNP Supporting Corporations are expected to comply with the poster presentation guidelines as published annually in the ACNP registration materials.
3. Data presented at the Annual Meeting should reflect original research findings (both negative and positive) be reported or made available in a timely fashion, fully and honestly, both in the professional literature and in presentations at scientific meetings.
4. ACNP Supporting Corporations should recognize that the ACNP Annual Meeting is dedicated to furthering the exchange of scientific knowledge in the field of neuropsychopharmacology. Therefore, ACNP strongly discourages the presence of non-scientist employees of the Supporting Corporations at the annual meeting venue. Supporting Corporations and their representatives must refrain from organizing competing activities (e.g. satellite sessions or social functions) that take meeting attendees away from sessions or other College activities and detracts from the scientific interaction at the meeting.
5. The Representatives of ACNP Supporting Corporations should ensure that their participation in the ACNP furthers a legitimate scientific or professional purpose, and that it does not interfere or conflict with the Supporting Corporation's business.
6. The Representative of ACNP Supporting Corporations should ensure that their participation in ACNP has received all approvals that may be required by their employer.
7. If there are questions about whether or not a particular activity is unethical, the Supporting Corporation Representative should take the issue to the ACNP Ethics Committee and/or to his or her company for advice.

VII. Enforcement

This code of conduct now represents the standard for behavior that the ACNP expects of its Supporting Corporations and their representatives. Any ACNP member who believes that a Supporting Corporation or a Corporate Representative of a Supporting Corporation has violated this code of conduct may bring that matter to the attention of the ACNP Ethics Committee. The Ethics Committee is empowered to investigate the matter, and if upon investigation the Committee believes that the Supporting Corporation or Corporate Representative is in violation of this code of conduct the Committee will bring that matter to Council. Council will then have the responsibility to conduct any additional investigation it may deem appropriate and to determine any sanction it may deem appropriate, up to and including banning the participation of the corporation as a Supporting Corporation of the ACNP.