Background

ABIMED, ABRAIDI, CBDL and the Advanced Medical Technology Association (AdvaMed) are medical technology industry associations representing manufactures and distributors of medical technology in Brazil. ABIMED, ABRAIDI, CBDL and AdvaMed understand their unique position and obligation to make compliance and ethical business practices a priority and are committed to facilitating ethical interactions between companies, third party distributors, and health care providers in Brazil. This document outlines parties’ shared vision and commitment to ethics, compliance, best practices, implementation, and compliance training & education in Brazil.

Ethical Business Practices

As healthcare and medical technology innovation extends beyond national and cultural boundaries, there is a growing need to promote internationally a harmonized environment of ethical business conduct among manufacturers, distributors, and healthcare professionals. ABIMED, ABRAIDI, CBDL and AdvaMed share common goals to encourage adherence to an agreed set of ethical business practices.

To that end, ABIMED, ABRAIDI, CBDL recognizes the AdvaMed Code of Ethics on Interactions with Health Care Professionals as one of multiple AdvaMed best practices tools and documents available to guide their compliance efforts and initiatives. Furthermore, AdvaMed and ABIMED, ABRAIDI, CBDL acknowledge the particular risk that Third Party Sales and Marketing Intermediary ("SMI") relationships pose to compliance with anti-corruption laws.

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1 The term “medical technology” refers to the full range of medical devices and diagnostic products used to diagnose and treat patients in hospitals and outpatient settings.
3 The Foreign Corrupt Practices Act ("FCPA"), the UK Bribery Act, and a multitude of other global regulations have increased the importance of Companies’ establishing an effective Third Party SMI compliance program to combat the increased risk of violations of legal and ethical principles within the distributor chain. To address these ongoing issues and to help provide training materials on effective Third Party SMI compliance programs, AdvaMed and Eucomed have collectively issued (1) Joint Guidance for Medical Device and Diagnostics Companies on Ethical Third Party Sales and Marketing Intermediary ("SMI") Relationships, (2) Distributor Training Slides, and (3) a Distributor Compliance Due Diligence
With this context in mind, both parties express their commitment to the following:

- Joint Compliance Training Initiatives
- Joint Educational Workshops & Programs
- Sharing of Best Practices
- Regular Exchange
- Open Dialogue
- Ethical Behavior & Business Practices
- Information Dissemination
- Implementation & Compliance

AdvaMed and ABIMED, ABRAIDI, CBDL plan to jointly assist their members to implement ethical business practices and serve as models for the Brazilian medical technology community.  

Through this document, ABIMED, ABRAIDI, CBDL and AdvaMed memorialize their shared understanding of the importance of ethical business practices and compliance training & education in Brazil. Both parties acknowledge and express their commitment to making ethical business practices a priority and upholding the principles outlined in this text.

Signatures

For AdvaMed: For ABIMED:

Christopher White Carlos Alberto P. Goulart
Senior Executive Vice President Executive President
General Counsel

Resource. All can be found at, https://sites.google.com/a/legal.advamed.org/advamedlegal/home/key-issues/distributor-relations.

AdvaMed would like to direct [Name of Brazilian Group]’s attention to the compliance training materials that have already been prepared by and approved by AdvaMed and AdvaMed’s 380+ member companies. These training materials, along with other key AdvaMed Ethics Compliance documents can be found at the link in footnote 3 of this document.
For ABRAIDI:

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Gilceu Serrato
President of the Board

Sergio Madeira
Executive Director

For CBDL:

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Fabio Arcuri
President of the Board

Carlos Eduardo Gouvea
Executive Director