Pharma Code and Pharma Cooperation Code in 2025
Annual report of the Code Secretariat

Introduction

For many years, the Swiss pharmaceutical industry has applied internationally coordinated (see IFPMA[1], EFPIA[2]) self-regulation that goes beyond the law with the Pharma Code (PC[3]) and the Pharma Cooperation Code (PCC[3]). Pharmaceutical companies can voluntarily agree to abide with these codes (see lists of signatories[4]). The supporting organisation for pharmaceutical self-regulation in Switzerland is scienceindustries, whereby its Code Secretariat is responsible for the implementation of the codes. It follows the principle of non-adversarial conflict resolution in the case settlement and thus primarily takes on a mediating role. In 2025 too, its neutral assessment was always accepted by the signatory companies involved and compliance with the Code was quickly restored in each case.

Implementation of the Pharma Code

The number of proceedings dealt with in connection with the PC decreased overall (2025: 79; 2024: 100), while the number of reports from competitors increased (2025: 31 / 39.2% cases; 2024: 29 cases / 29 %). In 2025, one company reported itself. Once again, no proceedings were classified as potentially hazardous to health and therefore as serious.

The average duration of proceedings decreased to 5.8 days in 2025 (2024: 6.7 days).

In 2025, a total of 79 proceedings were initiated. The lower number is partly due to Sharepoint, which made it possible to formulate formal errors in several documents in a single violation. The documents also contained fewer errors overall with regard to the mandatory information. Of the 79 proceedings, 74 (93.7%; 2024: 91 cases / 91%) were concluded after the advertising in question was corrected or the infringement was acknowledged and the required measures were implemented. In 5 cases (6.3% / 2024: 9%), no conduct in breach of the Code was identified. In four cases, there were delays due to the complexity of the issues (duration of proceedings > 30 days). As in the previous reporting year, no company had to be warned for not submitting the requested statement on time.

The Code Secretariat again did not carry out any mediation in 2025 (2024: 0), but was informed of 10 bilateral settlements (2024: 10), meaning the number remained unchanged compared to 2024.

In the reporting year, 74 pharmaceutical companies (2024: 79) sent a total of 15,056 specimen copies (2024: 13,460) of their promotional material and information; 99.9% of these were sent electronically (2024: 99.1%). The Code Secretariat reviews these on a random basis. Only 17 specimen copies reached the Code Secretariat by post. 67 companies now submit their specimen copies to the Code Secretariat via the Sharepoint, which was newly established in 2024.

Identified violations of the Code

In total, 22 (2024: 30) different PC sections were examined as part of the 79 (2024: 100) procedures mentioned above. In 21.5% of cases, only one section was in dispute (2024: 21%); 13% involved two sections (2024: 10%) and 64.6% of cases involved three to eight sections (2024: 69%). The PC sections that were frequently objected to are listed below:

- Fundamental correctness of professional promotion (PC 24.1): increase to 16 violations (2024: 12).
- Unsubstantiated advertising claims and incorrectly cited references (PC 24.2): decrease to 51 violations (2024: 79).
- Promotional materials that did not contain all the minimum information on the medicinal product required by the PC (PC 24.4, 24.5): halved to 4 violations (2024: 8).
- Incomplete or inadmissible literature references (PC 25, excluding PC 25.1, 25.4.3, and 25.7): decrease compared to the previous year with 16 infringements (2024: 19).

[1] IFPMA
[2] EFPIA
[3] The provisions of the two codes are referred to in the Annual Report by “PC” and “PCC” with the relevant section number.
[4] Signatories of the Pharma Code / Signatories of the Pharma Cooperation Code

- Missing indication that references can be requested from healthcare professionals (PC 24.2, 25.1, 25.4.3, and 25.7): 34 violations, down from 50 in 2024, these were systematically sanctioned for the first time in 2022.
- Reports of unqualified superlatives and comparatives (PC 25.8, 25.9): slight decrease to 14 violations (2024: 16).
- Ban on gifts (PC 15.1, 15.2 and PC 15.3): decrease to 1 violation (2024: 8).
- Promoting medicinal products or indications not yet authorized (PC 23.1, 23.2): decrease to 3 violations (2024: 5).
- Differences between the promotional claims and the medicinal product information as approved by Swissmedic at the time of authorisation (PC 23.3): slight increase to 8 violations compared with 6 in 2024.

As in previous years, it can be stated that the alleged violations of the PC in 2025 could not be classified as gross. Once again, it was not necessary to threaten to refer an arbitration matter to the competent state authority (PC 75.10) in 2025.

Support for further education and training events (section 3 PC)

In 2025, there have again been interventions by companies and the Code Secretariat in the implementation of the requirements for supporting continuing and further education events. In order to provide organisers and professional associations in particular with a simple guide, a "Checklist for pharmaceutical companies and organisers to check whether events for the purpose of postgraduate medical training or continual medical education may be supported" was published in 2023. Although this check list has well been taken into consideration, there are still repeated discussions, particularly with regard to the conference venue and the conference location.

At the beginning of 2025, the Code Secretariat therefore conducted a series of well-attended virtual training courses for professional associations and event organisers, during which it provided examples of how to use the checklist and apply it in individual cases. In 2025 also, the Code Secretariat again reviewed a large number of training and further education events on its own initiative and at the request of companies or event organisers to determine whether they meet the requirements of self-regulation and based its assessment on the long-established international benchmarks (in particular IPCAA[5] and e4ethics[6]).

The Code Secretariat has also compiled a list of cases to supplement the checklist and made it available to the signatory companies. This list summarises important individual case decisions made by the Code Secretariat and is intended to serve as a decision-making aid for PC signatories when assessing a specific request for support. In addition to the training courses, the Code Secretariat was and continues to be in regular contact with numerous organisers and professional associations, with the mutual aim of ensuring that events are organised in accordance with the Code.

Implementation of the Pharma Cooperation Code

Between 20 and 30 June 2025, the signatory companies of the PCC disclosed the pecuniary benefits granted in 2024 to healthcare professionals (HCP - primarily doctors and pharmacists), healthcare organisations (HCO - primarily hospitals and specialist organisations) and patient organisations (PO) on their websites for the tenth time. This involved compensation granted directly or indirectly for cooperation in connection with prescription-only medicinal products in human medicine. With the exception of one company, all companies submitted their data on time.

The Code Secretariat compiled the figures for the 65 PCC signatory companies and arrived at the following picture for Switzerland by the end of July 2025: a total of CHF 252.8 million in transfers of value (ToV) were disclosed for 2024. In 2023 the figure was CHF 242.3 million, which corresponds to an increase of CHF 10.5 million. At CHF 8.1 million, an identical amount of benefits were paid to HCP as in the previous year (CHF 8.1 million). ToV to HCO increased to CHF 140.6 million compared to CHF 128.3 million in the previous year. ToV for R&D services decreased slightly from CHF 106 million in 2023 to CHF 104.2 million in 2024.

[5] https://www.ipcaa.org/public/international-healthcare-congress-guidelines/
[6] https://www.ethicalmedtech.eu/e4ethics/about-e4ethics/

Once again, there was a certain shift in direct support towards HCO. Cooperation grants to HCO increased accordingly by more than CHF12 million to CHF 140.6 million. Grants for research and development decreased by just under CHF 2 million in 2024. In this area, the picture of grants from individual companies fluctuating sharply from year to year was once again confirmed, which can be explained, among other things, by the varying intensity of activities in the area of clinical research.

To ensure as much transparency as possible, disclosure should be made on an individual basis, i.e. by naming the person who received a benefit, which for reasons of data privacy requires the recipients to agree to the disclosure. Overall, the average consent rate for HCPs remained virtually unchanged in 2024 (from 94.9% in 2023 to 94.6% in 2024). The median rate was as high as 100%, which means that half of the PCC signatory companies were able to report HCP consent rates of 100%. The average consent rate for HCO increased slightly from 98% to 98.4%, with the median again at 100%. Overall, the consent rates were once again impressive, with a few companies able to achieve even better values. There are some significant discrepancies in the consent rates among the individual companies, which do not appear to be fully comprehensible. Three companies that achieved an HCP consent rate of less than 80% for the reporting year were therefore listed by name on the scienceindustries website (for reporting year 2023: 5 companies) and asked to identify measures to increase their consent rates. This shows a welcome development, as the number of companies that had achieved less than 80% was almost halved.

scienceindustries was again in contact with affected parties and interested media regarding the disclosure and explained the transparency initiative of the pharmaceutical industry.

Inquiries and training on the Pharma Codes

In 2025, the Code Secretariat responded to over 541 written or telephone inquiries in accordance with section 8 PC / section 6 PCC (previous year: around 330). Of these, 524 related to the PC and 17 to the PCC. The introduction of Sharepoint led to some additional correspondence (79 inquiries). The renewed significant increase in inquiries is partly due to the area of support for further education and training events. These inquiries required a great deal of additional consultation work. In 2025, the Code Secretariat again conducted two online training courses on promotional activities for healthcare professionals with a total of 110 participants and two on pharma compliance with a total of 78 participants. In addition, scienceindustries, in its capacity as the self-regulatory body of the Swiss pharmaceutical industry, gave presentations on various topics and answered media inquiries.

Code Secretariat

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