

## **Decision of the IPA Ethics Committee on Pharmaceutical Marketing Practices (ECPMP)**

### **Complaint No. UCPMP/IPA/2026/001 under UCPMP 2024**

The Indian Pharmaceutical Alliance (IPA) received a complaint under UCPMP 2024 against Mankind Pharma. The IPA Ethics Committee on Pharmaceutical Marketing Practices (ECPMP) examined it and have provided their decision. Following is the brief about the matter:

**Background to the Complaint** - A complaint bearing reference UCPMP/IPA/2026/001 was filed on 17 March 2026 by Mr Shobhit Goel, a former Area Business Manager of Mankind Pharma Limited, against his former employer. The Complainant alleged that Medical Representatives and field staff of Mankind Pharma Limited were systematically directed by senior management to photograph healthcare professional's prescriptions and share those photographs via WhatsApp groups for field performance monitoring purposes, and that this practice involved the circulation of unmasked patient-identifiable information on an unsecured platform without the consent of patients or treating physicians.

**Process followed under UCPMP 2024** - In accordance with Clause 11 of UCPMP 2024, an Independent Committee of five independent members comprising professionals from the pharmaceutical sector, academia, and law. It was constituted to examine the complaint objectively and make a recommendation to the ECPMP. The Independent Committee conducted a preliminary assessment on 28 April 2026 and thereafter heard both parties separately on 13 May 2026. It submitted its Recommendation to the ECPMP on 20 May 2026. The ECPMP considered the Recommendation and all materials on record and provided its Decision.

**Decision of the ECPMP** - **The ECPMP, accepting the unanimous recommendation of the Independent Committee, has dismissed the complaint.** The found that no provision of UCPMP 2024 has been violated on the evidence placed on record. The essential elements of a UCPMP violation, a gift, benefit, inducement or quid pro quo arrangement between a pharmaceutical company and a healthcare professional are entirely absent. The Complainant's own admissions before the Independent Committee established that Healthcare professionals were unaware of the prescription-monitoring activity and that no benefit of any kind flowed to any prescribing healthcare professional. The evidence tendered was unauthenticated and insufficient.

Further the ECPMP noted that the alleged practice of sharing unmasked patient prescription data on an unsecured platform without consent may engage the Digital Personal Data Protection Act, 2023. The ECPMP is not empowered to adjudicate on matters arising under any statute other than UCPMP 2024.