

PepsiCo Position on Conduct of Scientific Research

Recently there has been public attention concerning the susceptibility of research to biases of various kinds with most attention to potential bias from industry funding of bio-medical and nutrition research. Adherence to ethical principles is essential in all branches of research. Only ethically sound research can achieve public acceptance and trust and demonstrate the integrity required of PepsiCo researchers in alignment with the PepsiCo Code of Conduct. To help ensure that PepsiCo research will continue to be of the highest ethical quality, we are implementing following guiding principles and best practices based on recognized standards of other prominent research institutions. PepsiCo will share this policy with all prospective external researcher partners and require their agreement with these guidelines prior to initiating any research.

Guiding Principles on Transparency, Conflicts of Interest & Minimizing Bias

PepsiCo assumes all sponsored research where external researchers are part of an academic institution will be published in a peer-reviewed publication where the role of all authors (whether internal or external to PepsiCo) will be explicitly stated.

If the research includes or generates intellectual property or proprietary information, PepsiCo's research agreements state that PepsiCo has the right to review and edit all publications prior to publication for the following reasons:

1. to ensure PepsiCo confidential information is not disclosed (we have the right to require deletion of our confidential information)
2. to delay publication or other public disclosure if we determine that a patent application related to the research. This delay is typically 60-90 days to permit filing.

However, PepsiCo will not edit, delay or prevent publication because of the nature or favorability of experimental outcomes.

The role of PepsiCo will at all times be made public through disclosure of the source of funding.

For all research conducted by PepsiCo associates with external partners, the following guiding principles will apply:

- Conduct a request-for-proposal (RFP) process (minimum 2 organizations)
- Require that sponsored researchers agree to follow the ethical conduct rules applicable to the research being conducted
- Require that sponsored researchers agree to rules applicable to the protection of research subjectsⁱ
- Not offer payment tied to the outcome of any PepsiCo-sponsored research project.
- After protocol development, PepsiCo-supported clinical research shall be listed in a public registry or applicable databases. In the U.S. this would be the National Institutes of Health's ClinicalTrials.gov. In other countries, a local registry. If such registries do not exist, they will be listed at ClinicalTrials.gov
- Ensure approval of all clinical trials by an Ethics Committee.
- For secondary or *in vitro* research: after protocol development a charter internal review should take place.
- Ensure, in writing, prior to the onset of research that the sponsored researchers have the freedom and obligation to attempt to present and publish the findings within an appropriate timeframe;ⁱⁱ
- Require, in manuscripts, publications, conference presentations, and press releases a full signed disclosure of all financial interests and sponsorships by PepsiCo;
- Where PepsiCo associates are authors on any manuscripts and/or public presentations, these materials shall be submitted to the PepsiCo Scientific Publication/Presentation review process prior to publication.
- Disclose PepsiCo paid authorship arrangements related to either PepsiCo-sponsored publications or presentations, press releases or any other venues;
- Require that academic researchers, when they work with contract research organizations (CRO) or act as contract researchers, make clear statements of their affiliation; and require that such researchers publish only under the auspices of the academic institution and/or CRO with full disclosure of PepsiCo funding where relevant.

Where applicable these principles will be included in its contracts with external researchers so that the contractual terms obligate the researcher to abide by these principles

Best Practices for Research

PepsiCo intends to fund only research based on clearly stated hypotheses and an objective analysis. PepsiCo will require sponsored researchers to follow accepted principles of scientific rigor – in order to adequately test the stated hypotheses and assure accuracy of data produced.^{1,2} When performing research, PepsiCo expects funded researchers to utilize the appropriate validated gold standard research methods which will be monitored appropriately by PepsiCo. At a minimum, the guiding principles underlying the stringent Good Epidemiological Practices (GEP) and Good Clinical Practices (GCP) standards should be followed.

Best Practices for Communications

1. PepsiCo will make available on its website citations for, and hyperlinks to, PepsiCo-funded research at the time of publication in a peer-reviewed journal.
2. When promoting the findings of sponsored research, PepsiCo will be fully transparent about its role in the design, implementation and analysis of the research as well as in the research funding.

ⁱ This guideline, separating the science from the funding of it, will be fulfilled in a variety of ways, depending on the specific funding mechanism used in a given research project. For descriptions of the significant variety of research arrangements currently used, see guidance offered by the NIH. An excellent analysis of conflict of interest management with respect to the varied research funding mechanisms is also offered by FASEB.

- National Institutes of Health, Office of Extramural Research - http://grants.nih.gov/grants/funding/funding_program.htm
- Federation of American Societies for Experimental Biology. COI Toolkit: recommendations, tools, and resources for the conduct and management of financial relationships between academia and industry in biomedical research. <http://opa.faseb.org/pages/Advocacy/coi/Toolkit.htm>.
- Federation of American Societies for Experimental Biology. Points for consideration in academic-industry relationship agreements. http://opa.faseb.org/pages/Advocacy/coi/PointsForConsideration_Agreements.pdf
- Federation of American Societies for Experimental Biology. Conducting research. http://opa.faseb.org/pages/Advocacy/coi/investigators_conducting_research.html

ⁱⁱ For the purposes of these guidelines, the investigative team may include employees of the sponsoring entity. The contributions of the sponsoring organization – and employees – will be noted in the acknowledgement section of any publications and presentations, as appropriate.