

COMPLAINANT v ASTRAZENECA

Allegations about a post on LinkedIn

CASE SUMMARY

This case was in relation to a LinkedIn post from a senior leader at AstraZeneca. The post linked to an article in the Financial Times which discussed how the UK pharmaceutical market conditions were impacting AstraZeneca and referred to an AstraZeneca medicine, Enhertu (trastuzumab deruxtecan), by name. The complainant alleged that the LinkedIn post was in breach of the ABPI Code and AstraZeneca's social media policy which the Panel interpreted as an allegation that a prescription only medicine had been promoted to the public and that AstraZeneca had not maintained high standards.

The outcome under the 2024 Code was:

Breach of Clause 26.1	Advertising a prescription only medicine to the public
Breach of Clause 5.1	Failing to maintain high standards
No Breach of Clause 2	Requirement that activities or materials must not bring discredit upon, or reduce confidence in, the pharmaceutical industry

**This summary is not intended to be read in isolation.
For full details, please see the full case report below.**

FULL CASE REPORT

A complaint about AstraZeneca was received from an anonymous, non-contactable complainant.

COMPLAINT

The complaint wording is reproduced below:

“[A] UK [senior leader] of AstraZeneca has just re-posted a commentary piece by the FT. This link clearly mentions one of their promoted products Enhertu. This is in breach of AZ's social media guidance and the PMCPA guidance.”

When writing to AstraZeneca, the PMCPA asked it to consider the requirements of Clauses 26.1, 5.1 and 2 of the 2024 Code.

ASTRAZENECA'S RESPONSE

The response from AstraZeneca is reproduced below:

"We are writing to you in response to your letter dated 12 August 2025 regarding the above, concerning an anonymous complainant who described themselves as "Media".

The complainant's allegations can be broken down as follows:

1. An AstraZeneca (AZ) employee re-posted an article by the Financial Times (FT), which mentions an AZ promoted product.
2. This is in breach of AZ's social media guidance and PMCPA guidance.

Firstly, AZ would like to establish that there were no specific allegations made by the complainant regarding promotion to members of the public. The complainant stated that the article mentions one of AZ's promoted products; mentioning a product does not necessarily mean that the requirements of Clause 26.1 have been breached. We will however, address each of the complainant's allegations with regards to clauses 26.1, 5.1 and 2 of the ABPI Code of Practice as raised by the Case Preparation Manager.

Background

The re-posted article subject to the complaint, is titled "*Britain is squeezing AstraZeneca too tight. NHS curbs on drug prices have alienated UK Pharma companies and become self-defeating*". The article was written and published by the Financial Times (FT) with readership predominantly focused on topics related to businesses and the economy. The FT journalist retrieved information about AZ and the NICE outcome for Enhertu from publicly available minutes for the Business and Trade Committee meeting in March 2025.

The news article was re-posted by a UK-based senior AZ employee, alongside the text "*This FT article is urgent and critically important for the future of UK life sciences. AstraZeneca recently announced a \$50bn investment in the USA, just one of many similar announcements across the industry. I can't help wondering how much of that investment would have come to Britain if we had a medicines agenda focussed on being the best in the world in value creation vs best in the world at rationing and reduction.*"

Noting the full content of the article, it is clearly focussed on a broader discussion about the current challenges faced by the life sciences industry in the UK, and not specifically about AZ medicines. AZ had no editorial control of this article and therefore, there was no requirement for AZ to approve the content as is usual practice for articles published by media outlets.

The AZ senior employee who re-posted the FT article had 3,364 followers at the time of investigation.

AstraZeneca Response to the allegations

1. *An AstraZeneca (AZ) employee re-posted an article by the Financial Times (FT), which mentions AZ promoted products.*

As mentioned above, the aim of the article is to highlight current challenges in the UK life sciences industry as whole. It describes some of the impact these challenges have had on AZ, as one of the leading pharmaceutical companies in the UK.

The article discusses several factors that are impacting the life sciences industry, including the Voluntary Scheme for Branded Medicines Pricing and Access (VPAG), drug prices, drug budgets and specifically for AZ the collapsed plan to expand a UK based manufacturing site and the NICE approval process (using a recent example, Enhertu). These AZ specific examples are only briefly mentioned, and the article is largely focused on drug prices, drug budgets and government policy in the UK. The article is relatively long, and the user must scroll several times before they reach the end of it for the broader content compared with the brief mention of Enhertu.

There are only two sentences in the article that mention Enhertu:

1. The first mention addresses how Enhertu was rejected for NHS use in England: *"...rejection of the company's promising breast cancer drug Enhertu for NHS use in England"*.
2. The second mention states how: *"NICE decided that Enhertu, which has a list price of £118,000 per course was not good value for money"*.

As shown in the quotes above, overall, the article is not positive for Enhertu. The takeaway message is that Enhertu was not considered cost-effective by NICE.

In summary, Enhertu was mentioned in the context of the following details in the article:

- Enhertu was mentioned briefly as part of the ongoing discussion regarding NICE severity modifier which classifies advanced breast cancer as only a "moderately" severe disease, so drugs such as Enhertu do not qualify.
- NHS curbs on drugs prices and this effect on pharmaceutical companies.
- Voluntary Scheme for Branded Medicines Pricing and Access (VPAG) to cap growth in the NHS England budget.
- Overall challenges with pharmaceutical industry and considerations of moving their investment outside of the UK.

The overall discussion of the article is not about AZ's medicines and does not include product claims or language that would be seen to encourage members of

the public to seek prescription of this medicine (as it is clearly not available on the NHS in the UK).

Based on the details above, the brief mention of Enhertu in the article does not constitute as promotion. We, therefore, regard the article to be non-promotional and strongly refute breach of 26.1.

2. *This is in breach of AZ's social media guidance and PMCPA guidance.*

As described above, we consider the article to be non-promotional and therefore we do not deem it in breach of the PMCPA social media guidance.

Although The AstraZeneca Standard for Employee Use of Personal Social Media does state that "Employees must not post, share, or engage with content related to products,including news articles". This guidance is in relation to activities or materials with mention of a medicine that would be deemed promotional. As detailed above the mention of a product is in line with exception to promotion; this is exactly the case with regards to this Financial Times article which is about drug prices and pharmaceutical industry investment as a whole.

As for the training of this SOP, we can confirm that this was last assigned to all UK based employees in July 2025.

We therefore strongly refute the alleged breaches of clauses 26.1, 5.1 and 2 of the ABPI Code of Practice.

Summary of AstraZeneca's position

It is AstraZeneca's position that:

1. The FT article re-posted by an AZ employee is non-promotional.
2. Reference to Enhertu is minimal and overall, there are no positive claims in the article. It is about a much broader discussion on UK life sciences investment, NICE appraisal methodology and government schemes related to prices or discounts as detailed above.
3. Although the AZ Standard for Employee Use of Personal Social Media guidance is for employees not to post or link to content related to products, this article is non-promotional in nature as detailed above.

AstraZeneca is fully committed to the ABPI Code of Practice and takes its responsibilities under the Code very seriously; we strive to maintain high standards at all times."

FURTHER INFORMATION FROM ASTRAZENECA

AstraZeneca's response to a request from the Panel for further information is reproduced below:

"Thank you for your email on 6 March 2026, requesting the information below following AZ's response letter on the above case.

1. A copy of the full Financial Times article at issue
2. Details of the accessibility of the article (i.e was the article free to access?)

Please find screenshots of the full article at issue attached to this email correspondence.

The Financial Times targets a global audience of business leaders, policy makers, media and investors. Access to the Financial Times is restricted to subscribers, which are intended to within this target group. It is important to note that the complainant disclosed they were from the media. In addition, the article under the business section was written by [named journalist and job role], who writes on UK companies, entrepreneurs and business policy.

Regarding accessibility, there is a restriction for FT articles as part of ensuring focus on financial journalism. If the reader has not subscribed to the Financial Times, the following appears when they click through to the article:

[Screenshot provided of a webpage showing the title of the article at issue and informing the reader that they must register to read this article for free]

Therefore, a member of the public would not generally have been able to access the article at issue unless they were subscribed to the Financial Times."

PANEL RULING

This case was about a LinkedIn post made by an AstraZeneca UK senior leader which linked to a Financial Times article titled "*Britain is squeezing AstraZeneca too tight*".

The complainant alleged that the linked article mentioned an AstraZeneca medicine, Enhertu (trastuzumab deruxtecan), which was a breach of both AstraZeneca's social media guidance and the PMCPA guidance. The Panel interpreted the complaint to allege breaches of the ABPI Code of Practice that a prescription only medicine had been promoted to the public and that AstraZeneca had failed to maintain high standards.

The body of the LinkedIn post read:

"This FT article is urgent and critically important for the future of UK lifesciences.

Astrazeneca recently announced a \$50bn investment in the USA, just one of many similar announcements across the industry.

I can't help wondering how much of that investment would have come to Britain if we had a medicines agenda focussed on being best in the world at value creation vs best in the world at rationing and reduction."

In the Panel's view, the body text of the LinkedIn post did not directly or indirectly promote a prescription only medicine. However, it was an accepted principle that any material associated with a post, such as link, would normally be regarded as being part of that post and therefore the Panel had to determine if the content of the linked Financial Times article promoted Enhertu.

AstraZeneca submitted that the article was hosted on the Financial Times website and access was restricted to subscribers. The Panel accepted that the Financial Times was primarily focused on business and economic news and directed towards investor and analysts. In this case, however, the senior leader had, by sharing the link on social media, disseminated the content to the general public and the audience could therefore no longer be judged to be limited to investors and analysts. The Panel noted that there was nothing to prevent a member of the public registering to the Financial Times and being able to read the article. The Panel also noted that the LinkedIn post did not signpost the intended audience of either the post or the article and that, as an 'Opinion' article, the article might be of broad interest.

The Financial Times article was titled "*Britain is squeezing AstraZeneca too tight*". In the Panel's view, the article mainly focused on how the current UK pharmaceutical market conditions were affecting AstraZeneca, as submitted by the company in its response. Enhertu was mentioned by name twice in the article:

- *"[Named AstraZeneca senior global leader] has several beefs with AstraZeneca's home country, including the collapse of its plan to expand a vaccine plant in Speke, near Liverpool, and the rejection of the company's promising breast cancer drug Enhertu for NHS use in England."*
- *"Nice decided that Enhertu, which has a list price of £118,000 per course was not "good value for money" in England (in practice, the NHS negotiates discounts on list prices)".*

AstraZeneca submitted that, overall, the article was not positive about Enhertu and that the takeaway message was that the medicine was not considered cost effective by NICE.

The Panel noted the broad definition of promotion and observed that the article included the product name, that the product was indicated for breast cancer, the list price, and was described as "*promising*". The Panel considered the overall tone and content of the article as well as the intended audience.

The Panel considered that Enhertu was not the focus of the article and that the majority of the article's content related to UK market conditions. The Panel accepted that the article made clear that NICE had not recommended Enhertu based on financial considerations; however, in the Panel's view, the overall tone of the article was critical of the UK market, rather than specifically critical of Enhertu.

The Panel considered that the description of Enhertu as a 'promising' medicine, which implied that the outcomes from Enhertu treatment would be positive, in combination with the general tone of the article as set out above, meant that, on balance, the article promoted Enhertu. The

Panel concluded, therefore, that the AstraZeneca UK senior leader had promoted a prescription only medicine to the public. The Panel ruled a **breach of Clause 26.1**.

The Panel noted that AstraZeneca's social media policy instructed employees not to post, share or engage with "content related to products", including news articles and press releases, and that all UK staff were trained on the social media policy in July 2025. The Panel noted that the actions of the senior leader were contrary to the social media policy. The Panel considered that it was particularly important that senior employees complied with relevant rules and regulations, and set an example for company employees. The Panel considered that promotion of a prescription only medicine to the public was a serious matter and, particularly given the nature of the senior leader's role and that their public statements could reasonably be viewed as being made on behalf of the company, that AstraZeneca had failed to maintain high standards. The Panel ruled a **breach of Clause 5.1**.

The Panel noted that Clause 2 was a sign of particular censure and reserved for such use. Taking into account the overall message and focus of the LinkedIn post and linked article, which appeared to be a commentary on current market forces impacting AstraZeneca and the wider pharmaceutical industry, the Panel did not consider that the particular circumstances of this case warranted a breach of Clause 2. **No breach of Clause 2** was ruled.

Complaint received **8 August 2025**

Case completed **9 April 2026**