



## Rx-360 Audit Sharing Redaction Policy

### Audit Programs

#### 1. Right to Redact Information

Both the supplier who is the subject of an audit report and the company who sponsored the audit will be provided the opportunity to redact information from the audit report and related materials prior to sharing with third parties. The supplier and sponsoring company may redact any information that they feel is competitively sensitive. While any information may be redacted, it should be done so as to not materially alter the findings of the audit. If a sponsoring company finds that the redacted information materially alters the conclusions that one may draw from the remaining text, the sponsoring company should decline to share the redacted audit report with the Rx-360 Consortium.

#### 2. Information That Must Be Redacted

The following information should be redacted from all audit reports, supplier responses to audit reports, and any other materials prior to sharing with other members of the Rx-360 Consortium:

- ◆ Any information that identifies the company that sponsored the audit, such as the sponsoring company's name or address.
- ◆ Any information that identifies individuals employed by the sponsoring company, such as their names.
- ◆ Brand names of any of the sponsoring company's products.

#### 3. Responsibility for Redaction

Responsibility for redaction of the above information lies with the audited supplier and audit sponsoring company.<sup>1</sup>

#### 4. Redaction Method

Redaction may be performed on paper (i.e., by obscuring or covering the information) or electronically. If redaction is conducted electronically, care should be taken to prevent accidental disclosure in the form of hidden metadata.

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<sup>1</sup> For purposes of antitrust compliance, the Secretariat of the Rx-360 Consortium will review all audit reports and related materials prior to sharing them with other Rx-360 members to provide a second check against accidental disclosure. The Consortium disclaims any assumption of liability to the sponsor or audited supplier for the failure to redact information that the sponsor or audited supplier later deems commercially sensitive.